

STUDIO11
architecture

waller
planning

town and country
planning consultants

Supporting Planning Statement

Residential Development Proposals
Further Old Gate, Holbeach

August 2015

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1 Introduction

1.1 This Supporting Planning Statement has been prepared in support of a planning application for the conversion and extension of an existing barn at Further Old Gate, close to Holbeach. The application is submitted on behalf of the land's owners, JH and AJ King.

1.2 The application proposals are to re-use the existing structures of a single-storey brick-built barn and attached extensions towards the rear of the application site. The barn's existing walls would generally be retained, and added to where necessary, whilst a new roof and further modest extensions would be added, to enhance the property and provide a better standard of accommodation.

1.3 The proposed works would be largely similar to that which could be carried out in relation to the change of use of the barn to residential, under the provisions of Schedule 2 (Part3) (Class Q) the Town and Country Planning (General Permitted Development) (England) Order 2015 (the GPDO). This allows for the change of use to take place, and also for further alterations to the building, in order to create suitable and habitable residential accommodation.

1.4 The proposed development goes beyond the provisions of the GPDO in that it would extend the new dwelling a little way beyond the envelope of the existing barn, and that it also proposes further ancillary development, such as a detached garage. Following pre-application discussions with the Council, it has been decided to apply directly for the whole of the development required by the applicant, rather than following the more convoluted approach of applying for the change of use through the prior approval process allowed by the GPDO, and then making a subsequent planning application for the further alterations. This approach is considered preferable, as it will save time and expense for both the Applicant and the Council.

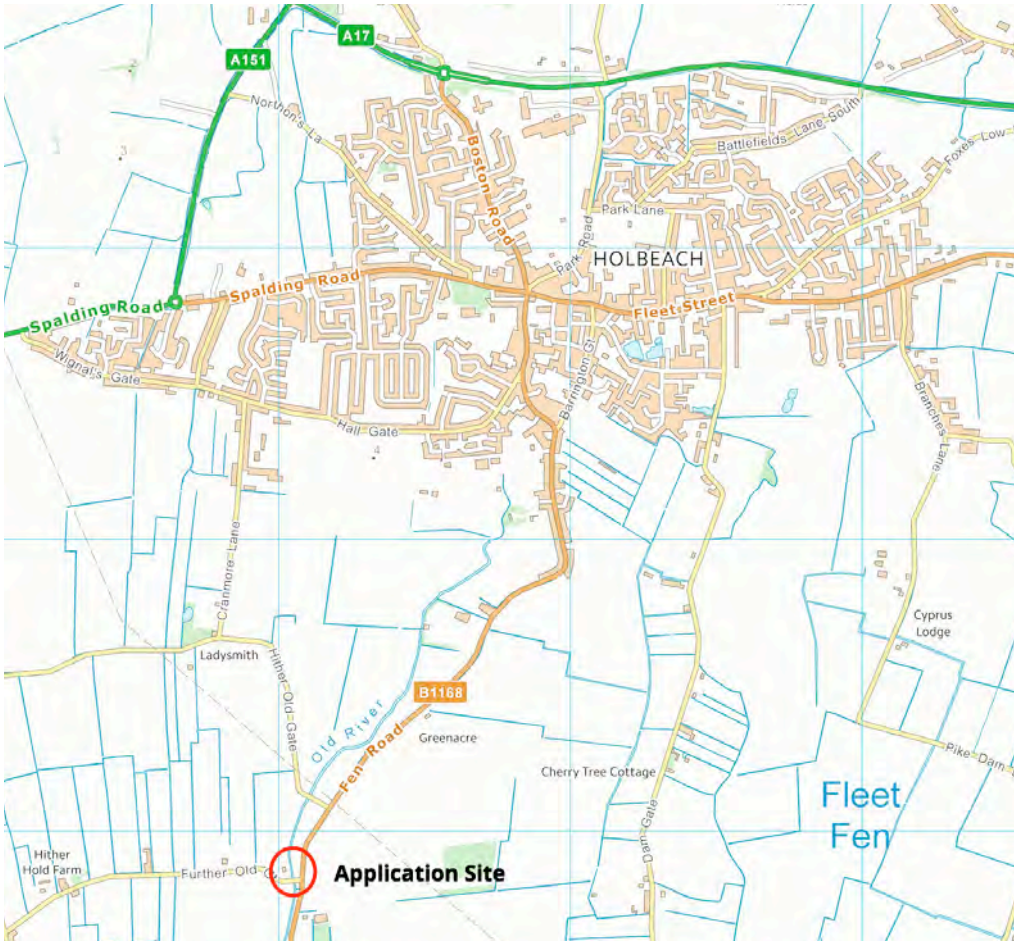
1.5 One of the matters to which the local planning authority are required to have regard is flood risk. This application is accompanied by a Flood Risk Assessment, which concludes that the proposed development is acceptable, and that any risk of flooding can be adequately mitigated. We have also considered planning matters in relation to flood risk within this statement, and we conclude that the proposed development would be acceptable with regard to national policy considerations relating to planning and flood risk.

1.6 We believe that the proposed development is entirely acceptable in planning terms. It would provide valuable housing, helping to meet a substantial local need. It would also benefit from the presumption in favour of sustainable development, and as such it should be granted permission would delay, in accordance with the requirements of the National Planning Policy Framework.

2 Contextual Appraisal

Site Location

2.1 The application site is located around 2.5km by road from Holbeach town centre. Holbeach is one of the most sustainable settlements within the district, and is identified by the South Holland local Plan as an **'Area Centre'**, which is intended to provide services for a wider rural community. Being close to Holbeach, the application site benefits from the services it provides.



The Application site is located a short distance to the south of Holbeach

The Application Site

2.2 The application site itself has previously been used for agricultural purposes. This is its established use, which has not been superseded by any other use, or abandoned. However, in recent years it has been surplus to requirements, and it has been left vacant.



Aerial photograph of the application site, in the context of surrounding fields

2.3 This land and the buildings within it are therefore no longer required for agricultural purposes. This is because the site forms an awkward corner of a field, whilst the buildings within are no longer required for modern agricultural purposes.

2.4 Close to the site's eastern boundary is a residential property, including a two-storey house of relatively modern construction. There are further houses and businesses located sporadically along the length of Further Old Gate road, to the west of the site.

2.5 The application site also contains sufficient land to enable the provision of an adequate visibility splay, to enable safe access and egress from the highway, when looking to the west.

3 Proposed Development

3.1 The proposed development involves the change of use of the existing barns within the site and their conversion and extension to form a new dwelling. The proposed house would re-use the existing structure of the brock-built barn within the site, which remains substantial and capable of conversion.

3.2 The new house would be partly single-storey and partly two-storey. The Design and Access Statement which accompanies this application explains that it has been designed in a vernacular form of architecture, intended to reflect both the site's agricultural setting and past, and also the modern residential development that it would now be. An illustration of the proposed development is shown below.

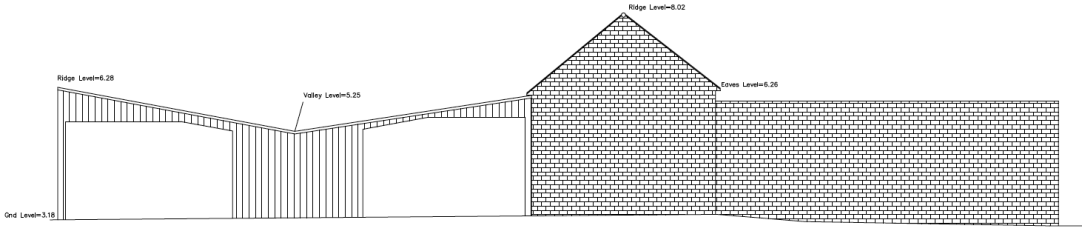


A site plan illustrating the proposed development

3.3 The existing brick barn would be retained and remodelled. The existing structure of the barn would be retained, as it is essentially sound. A new roof would be added to the building, and this is a form of development allowed by the provisions of the GPDO in relation to the conversion of agricultural buildings to residential use.

3.4 To the immediate north of this, the existing single-story extension to the barn would be replaced with a new structure on a similar footprint. The new structure would have two stories.

3.5 This is best illustrated by a comparison of the proposed western elevation, and a survey drawing of the western elevation of the existing building, shown below. A comparison of these drawings shows that the central barn would be retained, whilst the adjacent buildings would be replaced. This also illustrates that the general extent of built development would not be significantly altered by the application proposals, which are modest in scale.



Survey drawing of the western elevation of the existing buildings



Illustration of the proposed development, western elevation

3.6 To the south of the house, an existing metal agricultural building would be replaced with a new garage building.

3.7 The proposals also incorporate an area of land adjacent to the public highway, which would provide a new visibility splay to ensure sufficient visibility of oncoming traffic from the site's entrance. The hedges to be removed would be replaced, along with new hedges around the site's perimeter.

4 Planning Policy Review

4.1 Planning law requires that applications for planning permission must be determined 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, and the Lincolnshire Minerals and Waste Local Plans. In addition, the policies of the National Planning Policy Framework (NPPF) constitute important material considerations.

4.2 However, paragraph 215 of the NPPF states that where Local Plans are out of date, as the South Holland Local Plan now is, **'due weight should be given to relevant policies… according to their degree of consistency with this framework'**. As such, the weight to be accorded to the Local Plan's policies varies depending on their degree of consistency with the more up to date policies of the NPPF. This effectively means that the material considerations formed by the NPPF can be of greater importance in decision-making, and can be accorded more weight than the Local Plan's policies, where these policies are both out of date and inconsistent with the NPPF.

National Planning Policy Framework

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

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

[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.

4.4 Footnote 9 then clarifies that the policies in the NPPF which may indicate that developments should be restricted relate to a number of issues, such as the protection of designated wildlife sites, landscapes or Green Belt, none of which relate to this application. We do not believe that any of the policies in the NPPF indicate that development should be restricted on the application site, and we certainly do not believe that there would be any adverse impacts which would meet the high test of **'significantly and demonstrably outweighing the benefits'** that the application would bring. As such, we believe that this application benefits from the presumption in favour of sustainable development.

4.5 Paragraph 47 requires local planning authorities to **'boost significantly the supply of housing'**. In this context, it requires local planning authorities to identify a supply of specific, deliverable sites to provide five years' worth of housing against their requirements with an additional buffer of 5%, or 20% where there has been a record of persistent under delivery of housing.

4.6 This is a matter which is given great importance within the NPPF, and paragraph 49 notes that **'housing applications should be considered in the context of the presumption in favour of sustainable development'**. This paragraph also states that **'Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites.'**

4.7 With regard to residential development in rural areas, paragraph 54 states that **'local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs'**.

4.8 Paragraph 17 states that:

> **'Every effort should be made to meet the housing and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability...'**

4.9 Paragraph 19 states that planning **'should operate to encourage and not act as an impediment to sustainable growth'**.

4.10 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.'** (Our emphasis)

4.11 The NPPG sets out the procedure for directing suitable locations for development, in accordance with sequential and exceptions tests. Further details are set out in Section 6 below.

South Holland Local Plan

4.12 The saved policies of the South Holland Local Plan comprise the development plan for the area. The saved policies which are considered particularly relevant to the application proposal are considered below.

4.13 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.'**

4.14 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.'**

4.15 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'**. Holbeach is one of only 5 Area Centres in the District, and it is the second largest settlement in the District.

4.16 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.**

4.17 These policies are considered further in Section 5 below.

Emerging South Lincolnshire Local Plan

4.18 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. Work on the new Local Plan is currently underway, and the Councils' Local Development Scheme indicates that a draft Local Plan document may be subject to a public consultation later in 2015, with its eventual adoption envisaged for 2017.

4.19 At this stage, the emerging Local Plan is at a very early point, and it cannot be given any substantial weight in planning decisions. However, it is useful as an indicator of the Councils' latest evidence, for instance with regard to the need for housing.

4.20 The two Councils carried out a Preferred Options stage consultation in May 2013, which recommended a housing target of 470 dwellings per annum for the District, on the basis that this was considered achievable when compared against previous housing delivery rates. However, the

Councils' evidence has since indicated that higher migration-led dwelling forecasts will need to be accommodated. 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. We believe that this housing target is likely to represent a minimum assessment of housing need, and for a number of reasons which we do not go into here, the eventual target may well be somewhat higher.

4.21 The Council have used this most recent emerging housing target as the basis for the calculation of their housing land supply, and the implications of this are discussed further below.

4.22 One of the most recent pieces of evidence produced to support the emerging Local Plan is an assessment of Settlements and their Sustainability Credentials (June 2015). This considers the sustainability of all settlements within both South Holland and Boston Districts, with the exception of the two largest settlements of Spalding and Boston. It concluded that Holbeach is the most sustainable of the settlements considered, scoring 223 points, with the next highest score being 171 points for Long Sutton. As such, it can be seen as a highly sustainable location for development.

5 Material Planning Considerations

Permitted Development

5.1 The use of the building and wider application site could be changed from agricultural to residential use through the provisions of Class Q of Schedule 2 (Part 3) of the Town and Country Planning (General Permitted Development) (England) Order 2015 (the GPDO). This procedure would also allow for the change of use and alterations to the existing barn, for instance to provide a replacement roof, windows and doors.

5.2 Whilst this procedure could be used to obtain planning permission for residential development on the site, the Applicant wishes to go beyond the strict limits which the process would allow. We demonstrate below that it would be possible to comply with the GPDO's requirements. Following this, it would be possible to seek a further planning permission which sought additional development, in order to create a more satisfactory form of development, with a larger house, which would be both more functional and attractive, and also a separate garage. Such a process would be both time consuming and costly, and Studio 11 Architecture have therefore agreed in pre-application discussions with the Council that a single planning application would be sufficient.

5.3 With the above points in mind, we demonstrate in the table below that it would be possible to comply with the various criteria set out by the GPDO in relation to a change of use from agricultural to residential under Part 1 of Class Q.

	Class Q Requirement	**Application Response**
Q.1(a)	The site should have an established agricultural use, which pre-dates 20 March 2013.	The site does have a long established agricultural use, which precedes the relevant date.
Q.1(b)	The cumulative floor space of the new dwelling should not exceed 450 sq m.	The existing barn has a floor area of around 170 sq m, and so this figure would not be exceeded.
Q1(c)	Not more than 3 dwellings should be established on site.	Only one dwelling would be proposed.
Q1(d)	The site should not be occupied	The site is not currently occupied by

	by an agricultural tenancy, unless the express consent of both landlord and tenant has been secured.	an agricultural tenancy, but has more recently been farmed by the Applicant's own business.
Q1(e)	Any agricultural tenancy should not have been terminated within a year of development taking place and the termination must not be for development under Class Q.	The previous agricultural tenancy expired in 2007.
Q1(f)	No permitted development extensions have been carried out to the buildings since 20th March 2013.	No such extensions have been carried out in recent years.
Q1(g)	The new house should not exceed the building's current external dimensions.	It would be possible to create a new house within the external dimensions of the existing building.
Q1(h)	The development under Class Q would result in more than 450 sq m of residential floor space.	As with Q1(b), this would not be the case.
Q1(i)	The building operations required would not exceed permitted alterations to the windows, doors, roofs or exterior walls, the provision of services, or necessary partial demolition.	The proposals would not exceed these permitted operations. The existing barn is structurally sound, and with these alterations it could be made habitable.
Q1(j)	The site should not be on article 2(3) land.	The site is not on article 2(3) land.
Q1(k)	The site should not be, or form part of, a SSSI, safety hazard area, or military explosives storage area.	The site does not fall into any of these categories.
Q1(l)	The site should not be, or contain, a scheduled monument.	The site is not, and does not contain, a scheduled monument.
Q1(m)	The building should not be a listed building.	The building is not listed.

5.4 As such, it can be seen that it would be possible to comply with the GPDO's criteria in relation to Part 1 of Class Q. Part 2 contains further

conditions relating to the application of a prior approval process, which are considered below.

Transport and Highway Impacts of the Development

5.5 The creation of a single dwelling would not generate an unacceptable intensification of traffic on the local highway network. The level of traffic which would be generated must also be seen in the context of the traffic which could be generated by the site's use for agricultural purposes, which would include trips from tractors with heavy machinery.

5.6 A suitable highway access can be created, which would ensure the preservation of highway safety. This would be in the position of an existing access point. The proposed development would also create a new driveway, which would allow cars to turn within the site and exit in forward gear, which would be a further highway safety benefit.

Noise Impacts of the Development

5.7 The proposed development would be for a residential use, which would be entirely suitable in its context, next to an existing residential dwelling. This use would arguably be more suitable than an agricultural use, which might generate relatively higher levels of noise.

Contamination Risks on the Site

5.8 We are not aware of any likely sources of contamination within the site. As it has contained buildings for some time, it is less likely to have been intensively farmed than other farmland. However, should it be considered necessary, the Council would have the power to issue conditions in this regard, requiring the investigation and if necessary also the remediation of any contamination.

Flooding Risks on the Site

5.9 This matter is not considered likely to restrict the proposed development. It is considered in further detail in Section 6 below.

Whether the Building's Location or Siting Makes it Otherwise Impractical or Undesirable to Change from Agricultural to Residential Use

5.10 The National Planning Practice guidance has recently been amended to provide more detailed guidance with regard to this criterion. It states the following:

Is there a sustainability prior approval for the change to residential use?

The permitted development right does not apply a test in relation to sustainability of location. This is deliberate as the right recognises that many agricultural buildings will not be in village settlements and may not be able to rely on public transport for their daily needs. Instead, the local planning authority can consider whether the location and siting of the building would make it impractical or undesirable to change use to a house.[2]

What is meant by impractical or undesirable for the change to residential use?

Impractical or undesirable are not defined in the regulations, and the local planning authority should apply a reasonable ordinary dictionary meaning in making any judgment. Impractical reflects that the location and siting would "not be sensible or realistic", and undesirable reflects that it would be "harmful or objectionable".

When considering whether it is appropriate for the change of use to take place in a particular location, a local planning authority should start from the premise that the permitted development right grants planning permission, subject to the prior approval requirements. That an agricultural building is in a location where the local planning authority would not normally grant planning permission for a new dwelling is not a sufficient reason for refusing prior approval.

There may, however, be circumstances where the impact cannot be mitigated. Therefore, when looking at location, local planning authorities may, for example, consider that because an agricultural building on the top of a hill with no road access, power source or other services its conversion is impractical. Additionally the location of the building whose use would change may be undesirable if it is adjacent to other uses such as intensive poultry farming buildings, silage storage or buildings with dangerous machines or chemicals.

When a local authority considers location and siting it should not therefore be applying tests from the National Planning Policy Framework except to the extent these are relevant to the subject matter of the prior approval. So, for example, factors such as

[2] National Planning Practice Guidance, Reference ID: 13-108-20150305.

whether the property is for a rural worker, or whether the design is of exceptional quality or innovative, are unlikely to be relevant.[3]

5.11 In this context, it is clear that the site's location is suitable for a change of use from agricultural to residential development. It is in the rural area, but the NPPG notes that this is expected due to the nature of most agricultural buildings. It is not in an impractical or undesirable location for residential development, as it is close to Holbeach, which is a very sustainable settlement. It is also close to existing services such as potable water and electricity, being adjacent an existing residential property, and close to several more.

The Design or External Appearance of the Building

5.12 The existing barn could be converted to form a simple dwelling, which would not be unattractive in appearance. It would be likely to retain the essential characteristics of a rural building, as would be the case with the application proposals. In addition, any residential appearance to the building would be acceptable, given the site's context, next to an existing residential property.

5.13 With the above points in mind, we are confident that it would be possible to convert the existing barn from agricultural to residential use, under the provisions of Class Q. We believe that this is a very substantial material consideration in favour of the proposed development.

Housing Need and Supply

5.14 It is a need for housing in rural areas across the country which has led the Government to introduce the procedure allowed by the GPDO, for agricultural buildings to change to a residential use. This is consistent with the requirement of the NPPF to **'boost significantly the supply of housing'** (NPPF, paragraph 47).

5.15 South Holland is no exception to this overall shortage of housing, and there is currently a very high level of need for housing within the District. The Council have calculated that they are currently able to demonstrate only a 2.3 year housing land supply, rather than the 5 years + 20% buffer (effectively 6 years) supply that they are required to provide by the NPPF. The Council's own calculations are set out in the table below.[4]

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[3] National Planning Practice Guidance, Reference ID: 13-109-20150305.

[4] Table taken from the *NPPF 6 Year Housing Land Supply Assessment for South Holland District as at 31st December 2014*, produced by the South East Lincolnshire Joint Strategic Planning Unit.

A	Housing target for plan period (2011-2036)	13,950
B	Annual housing target across plan period (A / 25 years)	558
C	Five year supply target, no adjustment (B x 5)	2,790
D	Shortfall of housing provision from earlier in plan period (requirement less completions)	1,285
E	Five year supply target incorporating shortfall (C + D)	4,075
F	Buffer (20%)	815
G	Five year supply incorporating buffer (E + F)	4,890
H	Annual target for next five years (G /5)	978
I	Current expected deliverable supply 31st Dec 2014 - 31st Dec 2019	2,257
J	Gap (G-I)	2,633
K	**Council's housing land supply equivalent to (I / H)**	**2.3**

5.16 Thus there is a shortfall of housing in the immediate 5 year period of 2,633 dwellings. This has in fact increased from a shortfall of 1,938 dwellings, or a 2.9 year supply, calculated by the Council a year earlier. So, not only is the shortfall in the provision of housing very substantial, but it has also been increasing.

5.17 In this context, it is clear that any source of new housing must be considered positively. Where there is a shortfall in the 5 year housing land supply, paragraph 49 of the NPPF directs that **'Relevant policies for the supply of housing should not be considered up-to-date'**. It also directs that **'housing applications should be considered in the context of the presumption in favour of sustainable development'**.

5.18 Policies for the supply of housing include those which restrict development in the rural area, such as Local Plan Policies SG2 and SG4. These policies are consequently out of date, and can be given only limited weight in the determination of this planning application. In contrast, the need for housing is a factor which should be given substantial weight.

Sustainable Development

5.19 The proposed development would be sustainable because it would re-use an existing building, benefitting from the carbon emissions and energy embodied within it.

5.20 The site's location close to Holbeach also implies that residents would not need to travel far to reach services and facilities. In this regard, the application site is better placed than many in other more remote parts of the District, due to the relatively broad range of facilities available within Holbeach, which is the second largest and most sustainable settlement in the District. This is particularly pertinent when the high level of need for housing, and shortfall in supply is considered. There are insufficient housing sites, and so it is not possible to meet the need for housing in more sustainable locations.

5.21 In addition, a number of measures are outlined in the Design and Access Statement which accompanies this application. These include the provision of:

- A high level of thermal insulation;
- Low-energy lighting;
- Measures to reduce water consumption;
- Allowance for the future installation of solar water heating and / or photovoltaic panels.

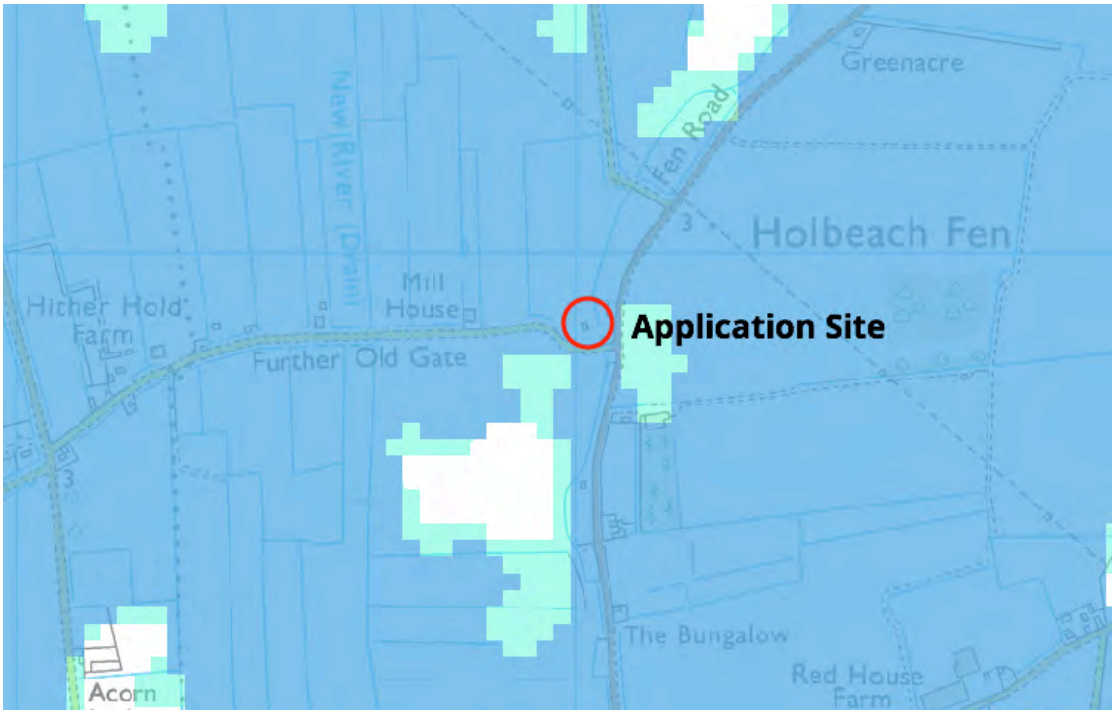
5.22 Through these measures, the proposed house would be one of the most environmentally sustainable within the District.

5.23 Finally, with regard to Local Plan Policy SG1, we note the following:

1. The proposed development would not adversely affect the quality of life of any residents. The new house would be well separated from the house to the east of the site.
2. The proposed development would be energy efficient, as noted above.
3. The proposed development would not compromise the District's character or environmental assets.

6 Flood Risk

6.1 The application site lies within Flood Zone 3a (high risk, dark blue on the drawing below), and close to areas of slightly higher ground, which are in Flood Zones 2 (medium risk, light blue) and 1 (low risk, white), as indicated on the Environment Agency's flood map for planning.

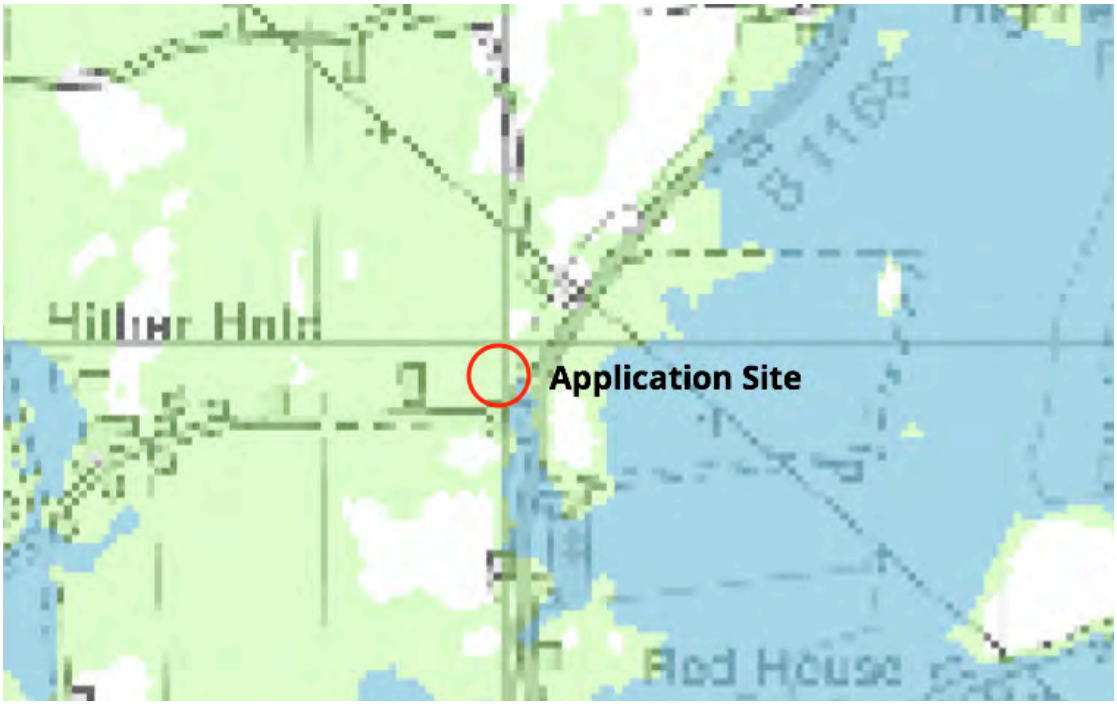


Annotated Extract from the Environment Agency's Flood Map for Planning

6.2 The Council have undertaken a Strategic Flood Risk Assessment (SFRA) for the District, which provides a greater level of detail than the Environment agency's standard flood map. This shows that the site is in fact within Flood Zone 2. As such, it is only considered to be at a medium risk of flooding, which is defined as between a 1 in 100 and 1 in 1,000 year storm event. An extract from the SFRA's flood map for planning is shown overleaf.

6.3 The National Planning Policy Framework (NPPF) generally requires that proposals for new residential development within Flood Zone 2 should be subject to a sequential test, to determine that the need for development cannot be met on sites which have a lower risk of flooding. However, paragraph 104 of the NPPF states that **'applications for minor development and changes of use should not be subject to the**

Sequential of Exception Tests, but should still meet the requirements for site-specific flood risk assessments.'



Annotated Extract from the SFRA's Flood Map for Planning

6.4 We have explained in Section 5 above that it would be possible to convert the existing barn into a residential dwelling. Such an application would not need to be subject to a sequential test, as it would comprise a change of use of an existing building. Beyond this, the definition of **'minor development'** given by the National Planning Practice Guidance (NPPG)[5] includes householder development, such as extensions to an existing dwelling.

6.5 We have established that it would be possible to achieve the development proposed by this application in this two-stage approach, and this would not necessitate the undertaking of the Sequential Test. The fact that the proposed development is proposed in a single application, for the pragmatic purpose of saving time and expense (both for the Applicant and the Council), should not lead to a different approach to the proposed development.

6.6 However, we believe that it may be helpful to the Council if we were to set out the broader situation in relation to flood risk. We believe that if the sequential test were to be undertaken in relation to this site, it would be passed, and this simply helps to demonstrate that this is a sustainable form of development.

[5] National Planning Practice Guidance, Reference ID: 7-046-20140306

Guidance on the Sequential Test

6.7 The NPPG contains guidance on the purpose and implementation of the Sequential Test. 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 flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible.'**[6] (Our emphasis)

6.8 The sequential test is ideally intended to be applied to development through the preparation of a new Local Plan, as this should be the means by which sufficient land for new development is identified. With regard to the preparation of Local Plans, the NPPG further explains that the sequential test is one of a range of planning considerations:

> **'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.'**[7]

6.9 The NPPG acknowledges that in the preparation of a Local Plan, there will be occasions when **'other sustainability criteria'** outweigh flood risk issues. These issues are resolved in the preparation of a Local Plan through the preparation of a sustainability appraisal, which considers all matters in the round, and concludes which course will represent the most sustainable form of development[8]. The NPPG notes that other sustainability criteria may outweigh flood risk issues.

6.10 For the preparation of a Local Plan, the NPPG requires consideration of every option for meeting the need for development, in Flood Zones 1, 2

[6] National Planning Practice Guidance, Reference ID 7-018-20140306
[7] National Planning Practice Guidance, Reference ID 7-020-20140306
[8] National Planning Practice Guidance, Reference ID 7-022-20140306

and 3, before it can be concluded that the need for development cannot be satisfied. Thus, where there is a suitable site within Flood Zone 2 (or 3), this should be allocated for development which is necessary, rather than failing to provide that development.

6.11 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.

6.12 Where the proposed development has not been allocated in a Local Plan, the NPPG provides 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.'**[9]
> (Our emphasis)

Application of the Sequential Test

6.13 The application of the sequential test, as outlined above, requires an exploration of whether there are available sites which could provide housing to satisfy the identified need. If there are sufficient new sites, their relative location with regard to flood risk should be considered.

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

6.14 We have established in Section 5 that there is a very high level of need for housing, and a worsening shortfall in its supply. As such it is clear that the proposed housing is **'necessary'**[10].

6.15 It is also clear that the sum total of **'deliverable'**[11] housing sites which the Council have been able to identify within their 5 year housing land supply, that these would fail to meet the immediate need for housing.

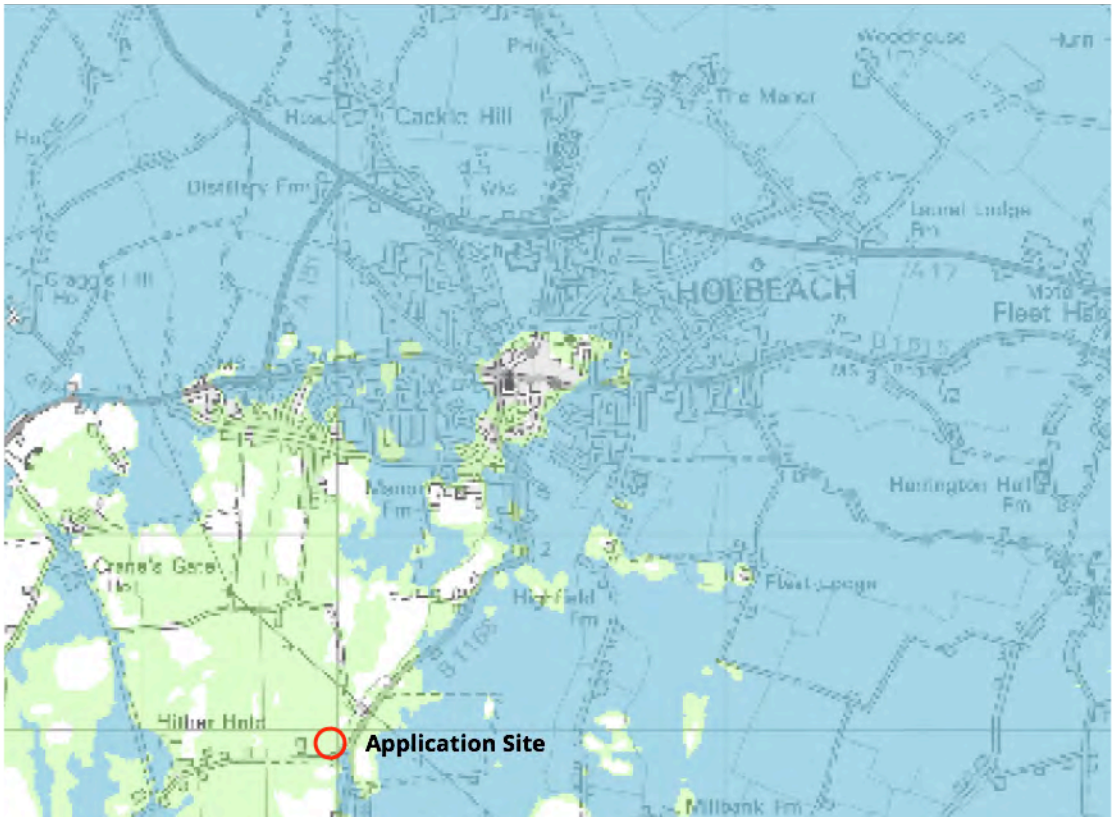
6.16 It is therefore clear that there are insufficient housing sites across the District which available within Flood Zone 1 (or any other Flood Zone) to meet the need for housing. Therefore, a suitable site within Flood Zone 2 should be considered to pass the sequential test.

6.17 An exploration of the availability of housing sites on a more local basis shows the same situation. The map below, taken from the SFRA, indicates the flood risk of land in and around Holbeach. This demonstrates that whilst part of the town falls within Flood Zone 1, much of the area is within Flood Zones 2 and 3. It is only land in the centre of the town, and then in the rural area to the south-west of the town, which falls within Flood Zone 1.

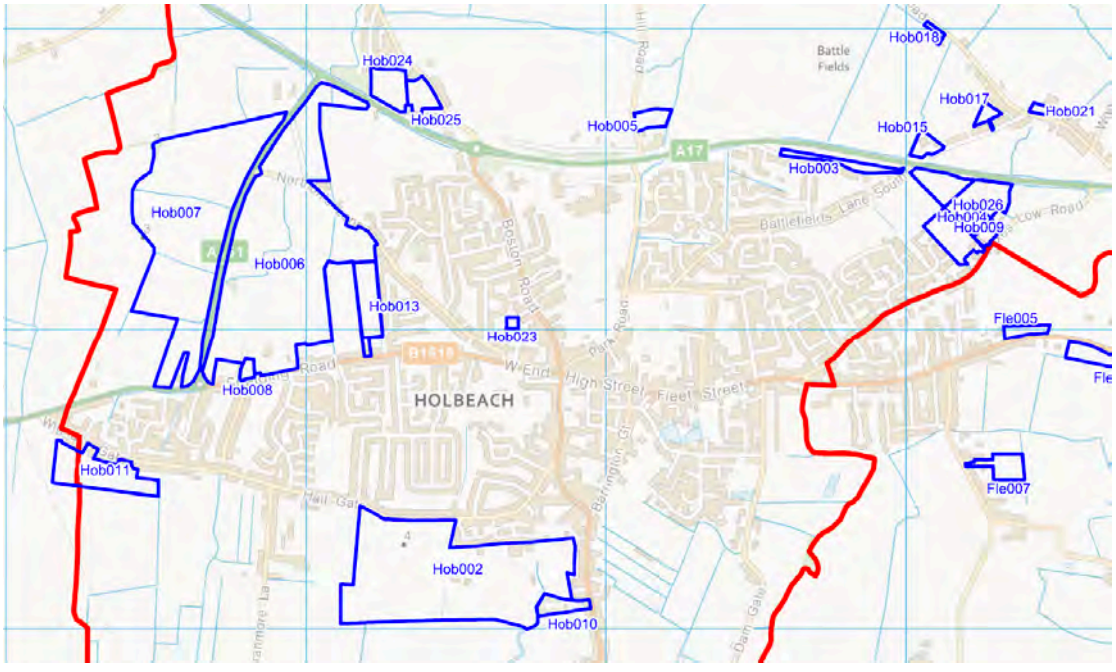
6.18 Below this is an extract from the Council's Strategic Housing Land Availability Assessment (SHLAA)[12], which shows the land which the Council have identified as being available for residential development. This represents all of the sites which have been put forward for the Council's consideration of potential locations for development, irrespective of whether the Council considers it to be suitable for development. Nevertheless, it can clearly be seen that there are no sites within the part of the town centre which is within Flood Zone 1.

6.19 The emerging Local Plan sought to allocate 1,000 dwellings to be built in Holbeach over the period 2011-31. This was based on the old housing target (see Section 5), and if this figure is increased pro-rata with the new housing target, it would increase to 1,480 dwellings.

[10] National Planning Policy Framework, paragraph 100.
[11] National Planning Policy Framework, paragraph 47.
[12] Strategic Housing Land Availability Assessment (2012), South East Lincolnshire Joint Strategic Planning Committee.



Extract from the SFRA, showing Holbeach and the surrounding area



Extract from the Council's SHLAA, showing sites in and around Holbeach

6.20 The Council's housing land supply identifies only 256 dwellings which are either allocated, or have planning permission, in Holbeach.

6.21 The SHLAA indicates that there may be capacity for a small amount of additional development in Holbeach on land within Flood Zone 1, on part

of site Hob002, but there is little further scope for development on SHLAA sites within Flood Zone 1. The SHLAA does not show any sites in the areas of Flood Zone 1 to the south-west of the town, beyond those shown on the map below.

6.22 We note that site Hob002 has recently been granted planning permission for up to 900 dwellings (this land is spans Flood Zones 1, 2 and 3). Whilst this is a substantial contribution towards meeting the need for housing, only part of the development can be expected to be delivered within the immediate 5 year period, and as we have explained in Section 5, this level of development is insufficient to make up the very large shortfall in housing provision, or to meet the high level of housing required in the town in the period to 2031.

6.23 In light of these considerations, it is clear that there is insufficient land available for residential development in the local area, which might meet the need for housing on land within Flood Zone 1.

6.24 We therefore conclude that the application site could pass the flood risk Sequential Test. We believe that this demonstrates that the proposals represent an entirely sustainable form of development.

7 Conclusions

7.1 This application proposes new residential development, through the conversion and extension of an existing barn. We have demonstrated that it would be possible to convert the barn to residential use, and carry out various alterations to it, by means of permitted development. However, the Applicant wishes to carry out some further minor alterations and extensions to the proposed house, beyond those that would be permitted by this process, as well as creating a detached garage in place of a further barn.

7.2 It would therefore be possible to seek planning permission for all of this work in two stages, first with an application for prior approval in relation to the change of use and works under permitted development, and then for the further works required. Such a process would be time consuming and expensive, both for the Applicant and the Council. With this in mind, Studio 11 Architecture have therefore agreed in pre-application discussions with the Council that they should prepare a single application, for the final form of development required by the Applicant.

7.3 The Government have introduced the permitted development route by which a barn can be converted to a home in response to the need for housing in rural areas. We have shown in this Statement that there is a very considerable shortfall in the provision of housing in the area local to the application site. This is a factor which weighs heavily in favour of the application proposals.

7.4 The application site lies within Flood Zone 2, as defined on the Council's Strategic Flood Risk Assessment. The National Planning Policy Framework (NPPF) clarifies that it is not necessary to undertake a flood risk Sequential Test for proposals for the change of use of existing buildings. Nevertheless, in order to demonstrate that the proposals are entirely acceptable and for a sustainable form of development, we have outlined the relevant evidence to demonstrate that even if it were to be applied, the application proposals would pass this Test.

7.5 The application proposals benefit from the presumption in favour of sustainable development. As such, they should be approved without delay, in accordance with Paragraph 14 of the NPPF.

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