



SH0003
28 March 2024

Development Management
South Holland District Council
Council Offices
Priory Road
Spalding
PE11 2XE

Dear Sir or Madam,

Re: 11 Delph Road, Long Sutton – Outline planning with all matters reserved for erection of single new home

On behalf of my clients, Sequence (UK) Ltd are pleased to submit an outline planning application for the erection of a single new home. The application comprises the following plans and documentation:

- Existing Site Location Plan and Block Plan (drawing no. 2020611-2020611-01);
- Indicative Proposed Block Plan and Site Location Plan (drawing no. 2020611-2020611-02); and
- Flood Risk Assessment (FRA).

The planning application fee of £578 has been paid directly by my client via the planning portal.

Site Context

Number 9 Delph Road is a detached chalet bungalow with dormers and a flat roof attached garage to the south-west. It effectively sits within a double width plot, with the south-western part comprising the application site and containing a pitched roof workshop building ancillary to number 9. This site, as shown on the submitted drawings comprises approximately 0.08ha and is referenced as 11 Delph Road.

There is an existing access off Delph Road and boundary treatments are predominantly formed from soft landscaping. There is a former glasshouse style building that sits to the rear of number 9 and across the boundary of the application site.

Neighbouring properties to the south-west include number 13 which is a bungalow and this section of Delph Road is more characterised by bungalows or chalet bungalows. To the north-east there are examples of 2 storey houses and there are further residential properties to the rear and opposite with the site within the built up area of Long Sutton.

Development Proposals

The application has been submitted in outline form only with all matters reserved and an indicative drawing only. The application is intended to agree the principle of residential development in the broad form set out within this application with full details to be provided at the reserved matters stage.

However, the indicative proposals demonstrate how the site can be brought forward to develop a high quality design response with the new home stepped between numbers 9 and 13 to continue the form of development, with parking to the front and a generous south-facing rear garden.

It is suggested that with a bungalow and chalet bungalow on either side of the plot, the new home should be a chalet bungalow of no more than 1.5 storeys to retain the character of the surrounds and prevent any loss of residential amenity. The applicants would be happy to accept a condition to this effect.

Site History and Pre-Application Advice

There is no relevant planning history in relation to the site. A pre-application enquiry was submitted to South Holland District Council in October 2023 and a response provided under reference PE-00325-33 comprising a written response received December 2023 and a follow up in January 2024.

The pre-application response was quite broad and referenced a number of design considerations which would not be addressed at an outline planning application stage. However there was no objection raised to the principle of residential development at the pre-application stage. It was considered that the sequential and exception tests would need to be addressed through a FRA, which has been included with this application and is considered further below.

Planning Policy Assessment

Section 38 (6) of the Planning & Compulsory Purchase Act 2004 , as amended by the Levelling Up and Regeneration Act 2023 requires that the determination of planning applications and appeals is undertaken in accordance with the development plan and any national development management policies, taken together, unless material considerations strongly indicate otherwise.

A revised version of the National Planning Policy Framework (The Framework) was published on 19 December 2023, with minor updates on 20 December 2023 and established that its policies are a material consideration which should be taken into account in dealing with applications from the day of its publication (paragraph 224).

Paragraph 11 of the Framework, advises that for decision taking this means “*approving development proposals that accord with an up-to-date development plan without delay.*”

The development plan comprises the joint South East Lincolnshire Local Plan 2019. There are currently no national development management policies and there is no Neighbourhood Plan covering this site

The site lies within the settlement boundary for Long Sutton, defined as a Main Service Centre, in the second tier of the settlement hierarchy within the Local Plan. Therefore the principle of residential development is acceptable in accordance with **Policy 1: Settlement Boundary** and **Policy 11: Distribution of Housing** with Long Sutton comprising a sustainable location with good access to services and facilities.

The plot is essentially double width in relation to the others fronting Delph Road, and therefore demolition of the detached garage to the south-west of the current property would provide sufficient space for a single new home, with plot sizes for the current and proposed new home in keeping with the prevailing character

of the surrounds. The position of the new home to the side (south-west) of the existing property would comprise a natural infill between numbers 9 and 13, and continue the current arrangement with parking to the front and generous south facing rear gardens for the current and proposed new homes. Therefore both the proposed new home and the existing and neighbouring properties would have/retain a good level of private amenity space with no concerns in terms of loss of light, privacy or development generally being oppressive.

Given the relationship with 13 Delph Road, which is further forward in its plot, the indicative proposals demonstrate the potential for the new home to be brought forward slightly from the existing property with a stepped or staggered arrangement, for an appropriate design response in relation to both numbers 9 and 13 and the prevailing character of the surrounding area. This will be considered further at the reserved matters / detailed design stage.

As set out above, the intention is to restrict the design of any new property at the detailed design stage to a chalet bungalow construction as opposed to a full 2 storey property to minimise any impact upon the host property and neighbours and to ensure it is in keeping with the surrounds. The applicants are happy to accept a condition to this effect. The chalet bungalow with rooms in the roof will also meet the requirement to demonstrate flood resilience and meet the exception test.

The proposals would therefore meet **Policy 2: Development Management**, **Policy 3: Design of New Development** and **Policy 36: Vehicle and Cycle Parking**, whilst the provision of a new family home would also be in accordance with **Policy 17: Providing a Mix of Housing**.

In accordance with **Policy 4: Approach to Flood Risk** and the South East Lincolnshire Strategic Flood Risk Assessment (SFRA) 2017, as well as consistent with the relevant sections of the Framework, the position of the site within Flood Zone 3 requires consideration of the sequential and exception tests and the submission of a FRA.

With regard to the sequential test, the FRA identifies that the majority of the District falls within the flood zone and the site has a low probability of flooding. Therefore the sequential test is met as there are not opportunities to locate development within lower areas of flooding.

With particular regard to the sequential test, we have reviewed other examples of the approach taken on comparable windfall sites within the District. The first of these was a 2022 planning permission HO2-0234-22 for 4 dwellings at Hereward Way, Crowland. The officer's delegated report here set out the following:

'However, the South East Lincolnshire Strategic Flood Risk Assessment (March 2017) shows that the site falls within a combination of "Low Hazard", "Danger for Some" and "Danger for Most" hazard zones, with potential flood depths of up to 0.5m (based on the 1% Fluvial/0.5% Tidal scenario). The Local Plan has allocated sequentially preferable sites in terms of flood risk that are capable of meeting the identified housing targets for individual settlements. Although the application site is not a housing allocation within the Local Plan (only suitable sites capable of accommodating 10+ dwellings have been allocated), the site does lie within the settlement boundary for Crowland.'

In general, there is a presumption in favour of sustainable development within settlement boundaries and windfall sites are expected to have a contribution towards housing supply (and maintaining the 5-year supply

of deliverable sites) in the district. As such, one could argue that, should the site be acceptable in all regards, and if the Exceptions Test is successfully passed, that the site is acceptable in flood risk terms, notwithstanding the fact that there are sequentially preferable allocated sites in the adopted Local Plan.'

There was a 2019 permission H11-0677-19 for the former haulage yard, Station Road, Long Sutton for 40 new homes. Here no sequential test is referenced in the officer's report, whilst the submitted FRA focusses only on Long Sutton but essentially advocates a flexible approach, recognising the sequential test not being met.

Furthermore application H11-0069-20, rear of 29 Station Road, which was granted in 2020 permits a new home with the officer's report considering the sequential test to have been met.

There are strong parallels with the above examples and the proposals here for 11 Delph Road, which will comprise a windfall scheme within the built-up area, helping to meet the Council's housing requirements, and therefore we would suggest a similarly approach should be taken to meeting the sequential test.

With regard to the exception test, the FRA sets out how the scheme has been designed to be flood resilient in the unlikely event of a breach in terms of finished floor levels and first floor accommodation and this can be secured by condition. With regard to the other aspect of the exception test to provide wider sustainability benefits, this is also met by the proposals. The new home is within a highly sustainable location in the Main Service Centre of Long Sutton. It will help to meet the Local Plan's housing targets of 11,681 new homes set out in **Policy 10: Meeting Assessed Housing Requirements**, including windfall requirements. Therefore this part of the exception test is also met.

Summary

This outline planning application looks to secure planning permission for a single new home on a sustainable site within the Main Service Centre of Long Sutton with access to a range of services and facilities. The proposals have been demonstrated to be in accordance with the development plan when relevant policies are taken as a whole and in accordance with paragraph 11 of the Framework, Sequence therefore respectfully suggest that the planning application is approved without delay.

I look forward to progressing this application with South Holland District Council in due course and please do not hesitate to contact me should you wish to discuss any aspect of the submitted application or require any additional information.

Yours sincerely,



Graham Bloomfield BA (Hons), MA, MRTPI
Land and Planning Partner