Land Adjacent 47 Bridge Road, Long Sutton

Mixed Residential and Commercial Development

Applicant: SEArch Ltd

Local Planning Authority reference: H11-1253-08

Job reference: 1253/2/JJ: 2/12/10

Sequential Site Assessment

PJPlanning
Graham Parker John Jowitt Town Planning

5 St Paul's Terrace
82 Northwood Street
Birmingham B3 1TH
tel • 07974 239016
john.jowitt@pjplanning.com

1. Introduction

1.1. On the 27th July 2010, an application to redevelop the above site for 49 dwellings, a proposed office and 9 commercial units including wind turbines, as identified on Plan 1, was presented to South Holland's Development Control Committee for consideration. The application was recommended for refusal by officers, the second reason stating:

> ***..it is the opinion of the Local Planning Authority that sequentially preferable sites capable of accommodating the proposed development are available elsewhere in Long Sutton, as identified in the Council's Strategic Housing Land Availability Assessment, 2008-2009. In the absence of a rigorous and comprehensive sequential site selection report demonstrating that no preferable alternative sites are available, the submitted report having been compiled after the site was purchased and the application submitted, it is considered premature to approve this application."***

1.2. The Committee deferred the application, and resolved that prior to reconsideration of the application, a report was required providing:

> (i) a robust sequential approach to site selection which made a realistic assessment of alternative sites;
>
> (ii) that there were no other sites that would be financially viable and;
>
> (iii) that there were no reasonably available sites at a lower risk of flooding.

This report responds to these requirements.

2. Description of the Application Site

2.1. The application site is described thus in the report to Committee dated 27th July 2010:

> ***"The site is located to the east of Long Sutton on Bridge Road, some 100m outside the closest point of the Defined Settlement Limit. The site extends to 4.23ha and was formerly used as a horticultural nursery. Approximately three-quarters of the site comprise open agricultural land, whilst the remaining quarter is given over to concrete hard standing, glass houses and other storage buildings.***
>
> ***The site sits to the rear of development fronting onto Bridge Road, which in the immediate vicinity comprises a mix of detached and semi-detached dwellings of varying ages, styles and plot depths, as well as a small haulage yard and workshop. The recently constructed Unity Gardens rural exceptions affordable eco-housing development lies adjacent to the application site to the east*** (sic – that site lies to the west), ***whilst the wider locality is characterized by intermittent frontage residential development and a number of commercial sites, including the Premier Foods major employment area."***

2.2. The site actually measures 41,864 sq m of the site. Of this area:

- 2,229 sq m is garden land not in a built up area, and is therefore defined as brownfield land. (5%)

- In addition, the total area for hardstanding and buildings is 9,613 sq m; whilst this counts as agriculture, being horticulture, it is now derelict, unused land. (23%)

2.3. Over 28% of the application site is therefore specifically brownfield, or is otherwise built on.

Plan 1: Site Location



3. Previous Sequential Assessment

3.1. The Robert Doughty Consultancy report submitted with the planning application dated November 2009 and entitled "Sequential Site Selection Report Including Scheme Justification" gave evidence to support the need for a greenfield location beyond the Defined Settlement Limit to Long Sutton for this development

3.2. Para 1.4 states the main principles of the proposal as:

- An exemplar development in zero carbon development and sustainable living.

- Land within settlement limits as defined in the Local Plan is not available and too expensive rendering the scheme unviable.

- The scheme relies on the careful association of affordable housing, allotments, open space and employment opportunities.

- The site is within walking distance of all the amenities Long Sutton has to offer including the significant employment opportunities along Bridge Road.

- Further opportunities exist around the site to develop initiatives embracing recreation and education.

3.3. In particular, that report gives detailed costing information to support the need to support the Application Site outside the Defined Settlement Limit, on the basis of the additional cost to provide a Code 6 development incorporating 50% affordable housing. At para 3.17, the report confirms:

"The cost of the project is such that land with the benefit of planning permission (allocated land values are much the same) inside any development boundary would render the scheme unviable."

3.4. With regard to the suitability of the proposed site, paras 5.4 and 5.5 state:

"The town centre is easily accessible on foot from the site, being approximately 1km to the east along Bridge Road. By comparison, the existing housing allocation on Lime Walk is 0.75km from the town centre. There is also a good bus service into the town and beyond and Long Sutton now falls within the extended Call Connect service. The site lies adjacent to the recently completed affordable housing scheme and it would, therefore, be reasonable to suggest that the council, in approving that relatively recent scheme, considers that site and by close association the current site, is a sustainable one.

In addition, although the site is a Greenfield one, there are a number of buildings already in existence and, as a consequence, the visual impact on the rural character of this edge of settlement location will be no greater than that which exists at present."

3.5. The description continues in section 7 of the report:

"Although the application site lies outside the defined limits of the settlement, in visual terms, that part of Bridge Road in the vicinity of the site is evidently part of the built up character of the town.

The recently completed affordable housing scheme to the west, coupled with the existing historic grain of development effectively creates an otherwise built up frontage.

This general character is further emphasised by the existing mixed-use development (industrial and commercial) to the south of Bridge Road that extends east, well beyond the application site frontage.

Development in the immediate vicinity of the site is not, however, limited to frontage only; the recently completed affordable housing scheme to the west represents development in depth as does much of the existing development to the south of Bridge Road.

The application site is currently occupied by a number of buildings which although agricultural in use, will assist in reducing the impact of the proposal and it should be remembered that the scale of the proposed buildings is less than that which exists at present."

4. Methodology

4.1. The approach to site selection utilised in this study has been based upon the guidance set out in the Department of Communities and Local Government publication "Strategic Housing Land Availability Assessments (SHLAA) Practice Guidance".

4.2. Para 6 of the DCLG guidance states:

> ***"The primary role of the Strategic Housing Land Availability Assessment (hereafter referred to as the Assessment) is to:***
>
> - ***identify sites with potential for housing;***
> - ***assess their housing potential; and***
> - ***assess when they are likely to be developed."***

4.3. Paragraph 33 requires that

> ***"the methods, assumptions, judgments and findings should be discussed and agreed upon throughout the process in an open and transparent way, and explained in the Assessment report. The report should include an explanation as to why particular sites or areas have been excluded from the Assessment."***

4.4. Accordingly, the Guidance sets a number of stages for the consideration of sites in a SHLAA. Para 14 sets core outputs that the study should provide:

1. A list of sites, cross-referenced to maps showing locations and boundaries of specific sites (and showing broad locations, where necessary)

2. Assessment of the deliverability/developability of each identified site (i.e. in terms of its suitability, availability and achievability) to *determine when an identified site is realistically expected to be developed*

3. Potential quantity of housing that could be delivered on each identified site or within each identified broad location (where necessary) or on windfall sites (where justified)

4. Constraints on the delivery of identified sites

5. Recommendations on how these constraints could be overcome and when

4.5. In this case, in respect of (1), the locations for development are indicated on a plan of Long Sutton, indicated by circles of approximately the correct area as the Application Site, rather than individual sites. This enables the study to be much more rigorous and inclusive in assessing every possible development opportunity.

4.6. For (2), Para 33 of the guidance requires sites to be considered as to whether they are deliverable and developable. Para 35 states:

> ***"In practice the considerations to be taken into account when deciding whether a site is deliverable, developable or not currently developable, will be the same. It will be the degree of availability and achievability, and, in particular, when any known constraints can realistically be overcome."***

4.7. Critical to the issue of viability is the need for third party land, either for access, or to provide the amount of land required to provide sufficient area to match the Application Site.

4.8. For (3) the size of site is the important factor, as this assessment considers alternative locations for development of the same size as the application proposal.

4.9. Para 39 continues:

> ***"A site is considered available for development, when, on the best information available, there is confidence that there are no legal or ownership problems, such as multiple ownerships, ransom strips, tenancies or operational requirements of landowners."***

4.10. In respect of (4), the sites are assessed against other applicable policies of the development plan. Para 38 explains that for sites other than those with an existing consent or which have been previously allocated:

> ***"the following factors should be considered to assess a site's suitability for housing, now or in the future:***
>
> - ***policy restrictions – such as designations, protected areas, existing planning policy and corporate, or community strategy policy (see paragraph 21 above);***
> - ***physical problems or limitations – such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;***
> - ***potential impacts – including effect upon landscape features and conservation; and***
> - ***the environmental conditions – which would be experienced by prospective residents."***

4.11. Recommendations as required by (5) on overcoming constraints are not appropriate to this study, as the cost and time involved in overcoming such constraints would mean that the site could not be judged to be sequentially favourable to the Application Site.

5. Development Plan Policy and Material Considerations

5.1. Section 38 (6) of the Planning and Compensation Act 2004 Act states:

> ***"If regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".***

5.2. Two specific development plan policies relating to the sequential location of development sites are relevant to this assessment.

5.3. Policy SG2 deals with the distribution of development, stating that:

> ***"All proposals for development must be located having regard to sustainable development principles"***

5.4. The policy goes on to set four principles. The first two of these are relevant to any relative assessment of sites. Subs 1 requires that development should:

> ***"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"***

5.5. With regard to this assessment, sites adjacent to the defined settlement limit must sequentially be considered more favourably to those such as the application site which are not.

5.6. Subs 2 of Policy SG2 requires that new development should ***"make efficient use of land"***. With regard to this sequential assessment, density the redevelopment of previously developed or derelict land will be sequentially preferable to the development of greenfield land.

5.7. SG4 deals with effect on character, and states:

> ***"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."***

5.8. Policy SG5 previously set a sequential approach to the development of agricultural land, permitting development of the best and most versatile agricultural land (Grades 1, 2 and 3a) where land of a lower agricultural grade is not available to accommodate the proposed development and the development is proposed on land of the lowest possible grade.

5.9. Natural England state:

> ***"The ALC system is used by Defra and others to give advice to local planning authorities, developers and the public if development is proposed on agricultural land or other greenfield sites that could grow crops."*** (Technical Information Note TIN049 "Agricultural Land Classification: protecting the best and most versatile agricultural land")

5.10. Whilst Policy SG5 is no longer a part of the Development Plan, government guidance as set out in PPS7 is a material consideration in this application, and sets similar requirements. Para 28 states:

> **"The presence of best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations (e.g. biodiversity; the quality and character of the landscape; its amenity value or heritage interest; accessibility to infrastructure, workforce and markets; maintaining viable communities; and the protection of natural resources, including soil quality) when determining planning applications... If any undeveloped agricultural land needs to be developed, any adverse effects on the environment should be minimised."**

6. Sites

6.1. Discussions have been held with Chris Crew (Senior Planning Officer) and Paul Jackson (Planning Manager) from South Holland District Council regarding the form of this assessment, and the following guiding principles have been agreed:

i) The site must be of at least the same size as the application site, being 4.23ha

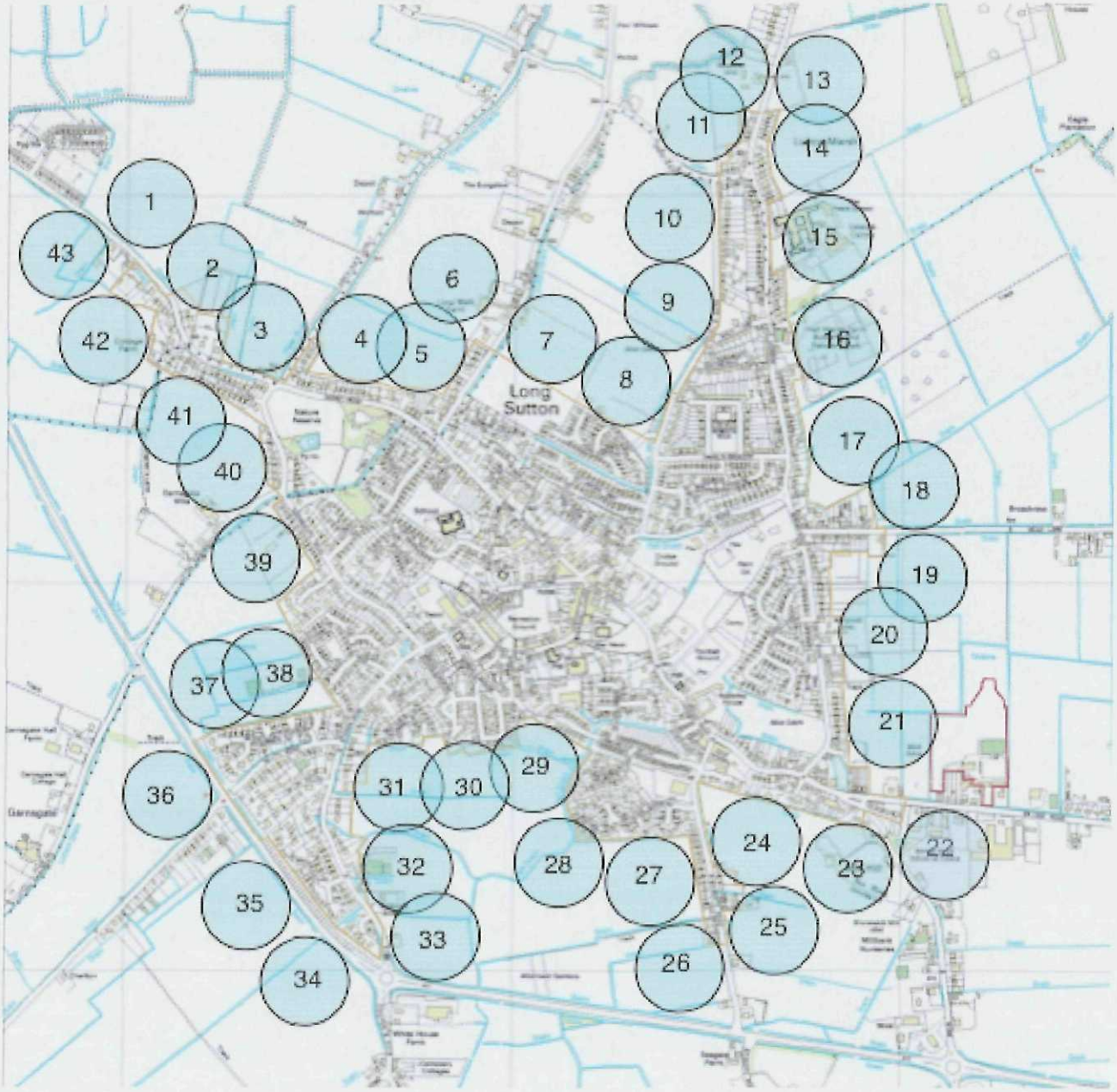
ii) The site must be beyond the Long Sutton Defined Settlement Limit but be no more than the same distance from the Defined Settlement Limit as the application site, being 100m.

6.2. The 43 sites considered and shown on Plan 2 comprise all locations, which meet these potential requirements, in order to ensure that the assessment is comprehensive. The size of the circle shown matches the area of the Application Site. The location of the sites has been agreed with Officers, and I can confirm that we are grateful for their assistance in the preparation of this report.

6.3. Discussions regarding methodology have continued during preparation of this report and the outcome of these discussions is recorded as part of the assessment that follows.

6.4. Plan 2 shows the location of all sites reviewed in this assessment

Plan 2: Site locations considered in this assessment



7. Assessment

7.1. This assessment deals with each of the three issues raised by Planning Committee in turn.

(i) A robust sequential approach to site selection which made a realistic assessment of alternative sites;

7.2. All sites, including those excluded by the 2008-2009 SHLAA were visited. The sites were then included in a matrix, to assess the sites against the requirements of para 14 of the "Strategic Housing Land Availability Assessments (SHLAA) Practice Guidance" as follows:

- Site number relating the site to the area identified on Plan 2
- Location
- Evidence collected in the preparation of South Holland's existing SHLAA (the 2008-2009 Annual Review) has been reviewed and this assessment is measured against the findings of the SHLAA for information and comparison.
- Accessibility; whether direct access is possible, or whether access will give rise to additional costs
- Viability is used in this matrix on the basis of whether the development set out in the Application is likely to be viable on that site. If access can only be secured over third party land, or through the loss of and existing house, or the site consists of multiple ownerships, or the site has been identified for potential development in the Council's SHLAA, it is unlikely to be viable

- The sites are assessed relative to the application site in respect of two specific development plan policy issues: Policy SG2 regarding the comparative efficiency of land use; SG4; comparative effect on character;

- Whilst the comparative loss of best and most versatile land is an important factor, the key to this issue is considered to be that set out in PPS7 para 28, that "If any undeveloped agricultural land needs to be developed, any adverse effects on the environment should be minimized". Given that all land around Long Sutton can be classed as best and most versatile, the issue is therefore one of the 'comparative efficiency of land use' in accordance with Local Plan Policy SG2, in other words, whether another site uses more brownfield or derelict land.

7.3. These criteria have been changed from the initial draft assessment following response from Officers. In particular, the original assessment considered the proposal more definitively against the Council's SHLAA. This approach was criticized, in particular the Council's assessment of timescale for development, which was used in the original matrix to help assess availability. These criteria have now been deleted, and SHLAA comments have been included solely for comparison.

7.4. The matrix, based on these principles is set out over the following pages. Those sites having a fundamental criterion preventing development for the development proposed, or which would have a greater detrimental effect than development on the proposed application site in the manner proposed are shown with that specific issue highlighted.

Site	Location	SHLAA Reference/ Assessment Suitability (Physical and environmental constraints)	Access	Viability	SG2; Adjacent boundary	SG2; Comparative Efficiency of Use of Land	SG4; Comparative Effect on Character
1	North of Gedney Road	N/A		Yes; direct access from road, appears to be single ownership.	No	Less	Greater
2	North of Gedney Road	27. Yes, but only .35ha P.CH P.BHE		No; access across 3rd party land		Less	Greater
3	West corner of Gedney Road and Dockings Holt	18. No S.CH ACC	Mitigation required to allow access across drainage ditch/to Docking's Holt	Some additional cost to provide access		Less	Greater
4	East corner of Gedney Road and Dockings Holt	06. No S.CH OSC	Mitigation required to Docking's Holt	Some additional cost to provide access		Less	Greater
5	West corner of Gedney Road and Limewalk	06. No S.CH OSC		Yes		Less	Same
6	West of Lime Walk Farm	03. No S.CH	No direct access.	No; requires removal of property for access	No	Less	Greater
7	East of Limewalk	13. No P.CH PF M.ACC	Access mitigation required	Line of mature trees require removal to provide access		Less	Greater; loss of mature trees
8	West of Daniels Gate	N/A		No; Multiple land interests. Allotments.		Less	Same
9	West of Daniels Gate	16. No S.CH M.ACC	Access mitigation required; drain	No	No	Less	Greater

10	Corner of Daniel's Gate	N/A		Yes; direct access from road, appears to be single ownership.		Less	Greater
11	Corner of Daniel's Gate and Little London	N/A	Access Mitigation required	No; multiple ownerships		Less	Greater
12	West of Little London	N/A		No; multiple ownerships		Less	Greater
13	East of Little London	21. No P.CH NS.ACC	No suitable access	No		Less	Greater
14	East of Little London	N/A	No suitable access	No; access required across third party land and/or removal of a house		Less	Greater
15	Peele School	N/A		No; school and leisure centre still in operation; cost of replacement		Better	Better
16	Hall Marsh Farm	N/A		No; site still in operation, future plans for sustainability centre, cost of replacement		Better	Better
17	East of Little London	15. N P.CH S.CH OSC M.ACC	No direct road access	No; access required across third party land and/or removal of a house		Less	Same
18	North of Woad Lane	N/A		Yes; direct access from road, appears to be single ownership.		Less	Same
19	South of Woad Lane	N/A		Yes; direct access from road, appears to be single ownership.		Less	Same
20	East of Roman Bank	12. Yes, but only in respect of 0.75ha M.ACC	No direct road access	No; multiple ownerships		Less	Greater
21	Corner of Roman Bank and Bridge Road	N/A	No access point	No; multiple ownerships		Less	Same

22	Bridge Road Industrial Estate	N/A		No; multiple ownerships		Less	Greater
23	Corner of Roman Bank and Bridge Road	05. No S.CH OSC	No access point	No; Access; levels difference or requires third party land		Less	Same
24	Mill Hill	05. S.CH OSC		Yes		Less	Greater
25	East of Seagate Road	N/A		Yes; direct access from road, appears to be single ownership.		Less	Greater
26	West of Seagate Road	N/A		Yes; direct access from road, appears to be single ownership.		Less	Same
27	West of Seagate Road	N/A		No; access required across third party land and/or removal of a house		Less	Greater
28	SW of Belton Drive	N/A	No access point	No; access required across third party land and/or removal of a house		Less	Same
29	South of Lancaster Drive	N/A		No; access required across third party land and/or removal of a house		Less	Greater
30	South of Lancaster Drive	07 & 11. No S.CH OSC M.ACC	No access point	No; access required across third party land		Less	Same
31	South of Spring Gardens	07 & 11. No S.CH OSC M.ACC		Yes		Less	Greater
32	East of Station Road	07 & 08. No S.CH OSC M.ACC	Some access mitigation required; drains	No		Less	Greater

33	East of Station Road	N/A		Yes; direct access from road, appears to be single ownership.		Less	Greater
34	Corner of A17 and Cowper's Gate	N/A		Yes; direct access from road, appears to be single ownership.	No	Less	Greater
35	South-west of A17	N/A		Yes; direct access from road, appears to be single ownership.	No	Less	Greater
36	Corner of A17 and Delph Road	N/A		Yes; direct access from road, appears to be single ownership.	No	Less	Greater
37	NE of A17	20 & 21. No P.CH NS.ACC	No suitable access	No		Less	Same
38	North of Midsummer Gardens	20 & 21. No P.CH NS.ACC	No access point	No		Less	Greater
39	South-west of Garnsgate Road	01, 09 & 17. No S.CH P.NCH OSC NS.ACC	No access point	No; multiple ownerships		Less	Greater
40	North of Lutton Garnsgate	N/A	Access point very limited, can't get visibility splays, fourth arm onto narrow junction.	Yes; appears to be single ownership.		Less	Greater; loss of trees to create access
41	South West of Villa Close	N/A	No suitable access	No; access requires third party land and/or removal of a house		Less	Greater
42	South of Gedney Road	N/A	No suitable access	No; access requires third party land and/or removal of a house		Less	Greater
43	South of Gedney Road	N/A		No; multiple ownerships		Less	Greater

Analysis

7.5. It will be seen from the matrix that 17 of the sites have no suitable access (6, 9, 13, 14, 17, 20, 21, 23, 28, 30, 32, 37, 38, 39, 40, 41, 42). Twenty-six of the sites are less financially viable to develop than the application site, being in multiple ownerships, or requiring mitigation to provide access (2, 6, 8, 9, 11, 12, 13, 14, 15, 16, 17, 20, 21, 22, 23, 27, 28, 29, 30, 32, 37, 38, 39, 41, 42, 43).

7.6. This initial sieving therefore removes 27 sites from further consideration. 15 Sites, numbered 1, 3, 4, 5, 7, 10, 18, 19, 24, 25, 26, 31, 33, 34, 35, 36 are left to be considered against local plan policies to see if they perform better or worse than the application site.

7.7. Sites 1, 34, 35 and 36 do not meet the requirement of Policy SG2(1) in that they do not adjoin the development boundary. They are therefore sequentially no better than the application site in respect of that policy requirement.

7.8. In respect of Policy SG2(2), over 28% of the application site is specifically designated brownfield land, or is otherwise built on. None of the remaining sites are either more efficient or even as efficient than the Application Site in terms of using derelict and/or brownfield land. All other sites remaining for consideration comprise land which producing crops.

7.9. In terms of Policy SG4 and effect on character, the application site is open to views on three sides; any other site developed in the same manner, which is open to views on two or more sides, therefore would not have less effect upon the character of the area, and would not be sequentially preferable in this respect.

7.10. The assessment shows that whilst several sites would have the same

effect as the application site, none would be less visible and therefore sequentially preferable in terms of effect on character.

(ii) That there were no other sites that would be financially viable

7.11. *The above analysis identifies 26 of the 43 sites as not financially viable* on the basis that development would require third party land for access, or the site would comprise multiple land uses, or the value of buildings already on the site.

7.12. In discussion regarding methodology, the view of officers has been that the owners of these remaining sites should be contacted to assess whether they would be prepared to sell the site for the same type of development as proposed on the application site and for the same purchase price. My view in preparing this report is that this is not an appropriate comparison for the following reasons:

i) Even the acceptance of an offer at this point is no guarantee that such a sale will actually take place.

ii) There is no guarantee that even if owners decided not to sell land at the price proposed now, that they might not do so in future, or that they might not develop the land in this manner themselves. Viability is therefore not a robust assessment of developability

ii) Since these remaining sites are farmland, development costs will be cheaper; however, this approach is contrary to local plan policy restrictions on the development of best and most versatile land and the efficient use of land.

7.13. No direct approach has therefore been made to individual landowners; on the basis of the analysis to (i), no other site would be sequentially preferable. An assessment against the development plan is a much more robust approach, in accordance with the SHLAA Practice Guidance, than viability assessed on the basis of any expressed existing willingness to sell.

(iii) That there were no reasonably available sites at a lower risk of flooding.

7.14. In respect of flooding, Para D5 of PPS25 states

"The overall aim of decision-makers should be to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, decision-makers identifying broad locations for development and infrastructure, allocating land in spatial plans or determining applications for development at any particular location should take into account the flood risk vulnerability of land uses and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required. Only where there are no reasonably available sites in Flood Zones 1 or 2 should decision-makers consider the suitability of sites in Flood Zone 3, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required."

7.15. The Local Planning Authority's consideration of flood risk is up to date. The Royal Haskoning plan "Update of Strategic Flood Risk Assessment" Map 3 is dated January 2010, and shows all of Little Sutton as located within Flood Zone 3 apart from a small element of land between Woad Lane and Bridge Road to the east of Roman Bank (sites 20 and 21), and a small area at Mill Hill (site 23) which is shown as Flood Zone 2.

7.16. These areas are not large enough in themselves to contain the amount of development required by this assessment. In addition, they do not affect the conclusions of this assessment, none of these sites passing the sequential assessment in (i) above.

8. Conclusions

8.1. This Assessment provides a rigorous and comprehensive sequential site review of all possible alternative locations that could provide for a development of the same character and size as that proposed at the Application Site, in the form required by the Local Authority's Planning Committee. It is directly referenced to the requirements of Government guidance and legislation.

8.2. The results of the assessment show that there are no sequentially preferable sites to the application site suitable for this form of development; indeed, it shows that the Application Site is the only possible location for the proposed development.

8.3.. Of the forty-three sites surveyed, 26 are shown not to be developable on the grounds of viability or access. A further five sites are discounted on the basis that they are no closer to the development boundary of Long Sutton than the Application Site.

8.4. The remaining twelve sites are shown to be worse than, or at best, no better than the Application Site when measured against other applicable policies of the Local Plan.

8.5. Given the size and nature of Long Sutton, all sites have good access to facilities and public transport; however, the Application Site is particularly well located in terms of access to employment, given the location of businesses along Bridge Road (former A17 Trunk Road). The proposed business units also benefit from these potential linkages.

8.6. With respect to financial viability, 26 of the sites are shown to be less viable for development of the character proposed than the Application Site. None of the remainder pass the sequential test set out in the matrix, and cannot be said to be sequentially preferable to the Application Site.

8.7. In addition, there are no other sites at a lower risk of flooding in or around Long Sutton, which are appropriate for the development proposed. The proposal, therefore, meets the Sequential and Exceptions Tests as set out in PPS25 Development and Flood Risk.

8.8. The Local Planning Authority can therefore support this proposal since this assessment is robust, and shows there is no sequentially preferable location which is viable or at a lower flood risk.

8.9. The principle of the scheme is supported and it will provide benefits in terms of affordable housing, new business accommodation and sustainability, which this sequential assessment shows cannot be provided elsewhere in the village.