



**Planning Statement
submitted on behalf of
Pure Leisure Group**

Proposed residential
development of land at
Silverhill, Luton Gowts

March 2016
Our Ref: EJWP-217PS

1. Introduction

- 1.1 This planning statement has been prepared by EJW Planning Ltd on behalf of Pure Leisure Group in support of a planning application for 5 residential dwellings on land to the east of the Silverhill Holiday Park at Lutton Gowts.
- 1.2 This statement describes the site and its surrounding area, considers the history of the site plus the relevant planning policies and other material considerations relevant to the determination of the application. It concludes that the proposed development accords with the Development Plan and the National Planning Policy Framework (NPPF), and should be granted planning permission. This statement is to be read in conjunction with the following documents that form a part of the application submissions:
- Design and Access Statement
 - Phase 1 Habitats Study and Arboricultural Assessment
 - Flood Risk Assessment and Drainage Strategy
 - Contamination Study
 - Plans and drawings

2. Land at Silverhill, Lutton Gowts

- 2.1 Lutton Gowts, and its close neighbour Lutton, are small settlements to the north of the town of Long Sutton.
- 2.2 Long Sutton town centre is located a short distance (1.7 km) to the south of Silverhill and provides a full range of shops and services. The primary shopping area is located on either side of the Market Place and includes a supermarket, High Street banks and a wide range of independent retailers. Long Sutton is an attractive town, with the majority of the town centre being designated as a Conservation Area and as a result is well maintained. The town contains a number of parks and green spaces for community use.
- 2.3 The residential area of Lutton Gowts extends north from the settlement boundary of Long Sutton and comprises several distinct groups of properties in a linear form extending as far as the village of Lutton. There are local facilities including a general

store, post office and public house located within the village of Lutton as well as a primary school and pre-school (1.4 km north west of the site).

2.4 The Peele Community College and Leisure Centre are located between Long Sutton and Lutton Gowts and are within walking distance (640 metres to the south) of the Silverhill site.

2.5 The application site extends to 0.39 hectares and comprises a parcel of land with road frontage to Lutton Gowts. The site currently provides a parking area and reception centre for the Silverhill Holiday Park, an established holiday park development. The site is well-landscaped with trees and ornamental shrubs and provides an attractive mature setting for the proposed residential development. The dwellings will be accessed from the existing driveway to the holiday park.

2.6 The site is previously developed and offers an opportunity to provide a sustainable infill development within the established residential area of Lutton Gowts.

3. The application proposals

3.1 The application seeks full planning permission for five detached dwellings and garages on land to the east of the Silverhill Holiday Park.

3.2 The proposed houses will follow the established building line and be set back from the road with deep landscaped frontages. The site layout has been designed to respond to the surrounding context and setting by taking full advantage of the existing mature trees and ornamental shrubs within the site.

3.3 The dwellings will be accessed from the existing driveway from Lutton Gowts to the holiday park. The individual plot entrances will lead onto a gravel drive that will adjoin the private driveway to the remainder of the site.

3.4 The attractive entrance to the site and the layout of the proposed housing responds well to the existing physical context and surrounding land uses in this part of Lutton Gowts. The proposed development strikes an appropriate balance between safeguarding the semi-rural nature of the site and the appropriateness of the land for a

residential infill development within Lutton Gowts. The site adjoins existing residential development to the north and south and is well related to Long Sutton town centre. It is therefore in an inherently sustainable proposal.

4. Planning Policy Context

The National Planning Policy Framework

- 4.1 The National Planning Policy Framework (NPPF) which was published in March 2012 now forms a key part of the Government's reforms of the Planning System and provides a single policy framework, replacing almost all of the Planning Policy Guidance Notes, Planning Policy Statements together with related circulars and letters, which were immediately superseded.
- 4.2 At the heart of the NPPF is a presumption in favour of 'sustainable development'. This is seen as the 'golden thread' running through both plan making and decision-making. The overarching intention of the NPPF is to promote development and introduce a more positive approach to planning decisions.
- 4.3 The NPPF retains the longstanding principle that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The NPPF doesn't change this, but requires that proposed development that accords with an up-to-date Local Plan should be approved, and that which conflicts with it refused, unless material considerations indicate otherwise.
- 4.4 Paragraph 7 of the NPPF sets out three dimensions to sustainable development which relate to economic, social and environmental considerations. The identified economic consideration relate to ensuring sufficient land of the right type is available to support housing growth. Social considerations include the provision of a supply of housing required to meet the needs of present and future generations, whilst environmental considerations relate to the protection of the natural, built and historic environment.

- 4.5 The NPPF is structured under a number of section headings and those pertinent to this application are identified below.

Housing delivery

- 4.6 With regard to applications for housing, the NPPF states that these should be considered in the context of the presumption in favour of sustainable development.
- 4.7 The NPPF sets out to ensure the delivery of a wide choice of high quality homes. In so doing it considers (at paragraph 47) that where there has been a record of persistent under-delivery of housing, local planning authorities should, in addition to identifying a 5-year supply of housing, include a buffer of 20% to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.
- 4.8 The footnote to this section provides the definition of deliverable sites (as previously defined in PPS3). To be considered deliverable, sites should be available now, offer a suitable location for development now, be achievable with a realistic prospect that housing will be delivered on site within five years and, in particular, that development of the site is viable.
- 4.9 The starting point for the consideration of this application should be that the Local Planning Authority cannot demonstrate a 5-year supply of deliverable land for housing and therefore little weight can be attached to the housing policies of the development plan.
- 4.10 The application site is immediately available; it provides a suitable location and would contribute to the maintenance and enhancement of a sustainable mixed community. Furthermore, there is a genuine and realistic prospect of the development commencing within 12 months of the grant of planning permission, bringing forward much needed housing without delay.

The rural economy

- 4.11 With regard to the need to support a prosperous rural economy, the NPPF promotes the retention and development of local services and community facilities in villages, such as local shops, meeting places, public houses and places of worship (paragraph 28).
- 4.12 Continuing the theme of the promotion of sustainable development in rural areas, the framework states that housing should be located where it will enhance or maintain the vitality of rural communities (paragraph 55).
- 4.13 The 'direction of travel' of Government policy is clear. It expects Local Planning Authorities to take a holistic approach to the management of development in rural areas, grounded in the three dimensions of sustainable development.
- 4.14 This proposal is capable of contributing to all three. The development contributes economically through delivering land for housing to support growth and boost the Council's housing supply and increases demand for local shops and service; it contributes socially by supplying a group of family homes to meet identified housing needs; and finally the development contributes environmentally, by providing a sensitively designed, settled development in a sustainable location which will enhance the appearance and setting of the village.
- 4.15 The application site is well located in relation to existing community facilities including the local primary school and other community facilities.
- 4.16 The site is available and in the absence of any significant constraints could be developed in the near future.
- 4.17 Therefore the positive attributes of the development, in terms of the economic, social and environmental gains, means that the scheme would constitute sustainable development in the context of the framework.

Good design

- 4.18 The framework considers that good design is a key aspect of sustainable development, that is indivisible from good planning, which should contribute positively to making places better for people. Paragraph 58 advises that planning decisions should aim to ensure that new developments optimise the potential of a site to accommodate development whilst responding to local character. Paragraph 59 confirms that local planning authorities should avoid being overly prescriptive but should concentrate on guiding the overall scale, density, massing height, materials and access of new development in relation to neighbouring buildings.
- 4.19 Careful consideration has been given to the design of the development, which will comprise a small development of detached dwellings of a traditional character and style in keeping with the group of detached dwellings to the south. Consequently, the application proposals will achieve a high quality development appropriate to its setting.
- 4.20 In summary, in relation to the NPPF, the development plan should be regarded as out of date and the presumption in favour of sustainable development at paragraph 14 of the NPPF should be applied. Furthermore, paragraph 215 of the Framework makes it clear that where policies in the development plan were published prior to the Framework, they can only be accorded weight in the decision making in accordance with their consistency with the Framework

The Development Plan

- 4.21 In respect of decision making in considering planning applications there is a presumption in favour of the development plan unless material consideration indicates otherwise as stated in s.38 of the Planning and Compulsory purchase Act 2004.

'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.'

- 4.22 For the purposes of this application, the development plan comprises:
- The saved policies of the South Holland Local Plan 2006
 - The emerging South East Lincolnshire Local Plan 2016
- 4.23 The Core Strategy provides the strategy and over-arching policies for the provision of new development within the towns and villages of the District with the aim of increasing accessibility to services and facilities, maximising the use of previously developed land and protecting the countryside from unnecessary development.
- 4.24 The Strategy proposed that most new housing development within the District should be concentrated in the towns of Spalding, Holbeach, Crowland, Sutton Bridge and Long Sutton. Limited housing is anticipated within the remaining villages and settlements.
- 4.25 The following policies of the Core Strategy are considered of relevance to this application
- 4.26 Policy SG1 sets out the Council's objectives for achieving sustainable development and states that planning permission will be granted where the Council is satisfied that the proposal is consistent with the principles of sustainable development, and where:
- i. the quality of life for residents is unimpaired or enhanced;
 - ii. reasonable measures have been taken to conserve energy and natural resources; and
 - iii. South Holland's essential character and main environmental assets are not damaged.
- 4.27 Policy SG2 sets out the Council's strategy for the distribution of new development. This includes giving priority to the use of previously developed land, making efficient use of land, ensuring that development is linked directly to the highway network and ensuring that development is acceptable in terms of traffic generation and road safety within the surrounding area.

- 4.28 Policy SG3 provides the settlement hierarchy for the district starting with the Main Town of Spalding and then the Area Centres of Holbeach, Long Sutton, Sutton Bridge and Crowland followed by the Group Centres which are the villages of Cowbit, Deeping St Nicholas, Fleet Hargate and other which act as local service centres for the surrounding villages. Finally at the lower end of the hierarchy are the Rural Settlements where a limited amount of new development will be permitted where it meets local needs and where the location of the development is well-related to the built up area of the settlement.
- 4.29 The Policy acknowledges that rural settlements such as Lutton Gowts are often well located to a defined Area Centres (Long Sutton in this case) and will therefore have access to a range of services.
- 4.30 With regard to the rural areas Policy SG4, states that planning permission for development outside of settlement boundaries will only be permitted where the need for the development outweighs its impact and development would not have an unacceptable impact upon the landscape character of the area.
- 4.31 Policy SG7, Energy Efficiency, requires new developments to achieve maximum efficiency through site design and orientation. However, 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 Plan Policies. It is only necessary therefore for the build specification to comply with Part L 2013 of the Building Regulations to meet the level of energy efficiency expected by the policy.
- 4.32 Policies SG8, SG9, SG11 and SG12 when taken together cover the issues of water efficiency, flood risk, sustainable urban drainage together with surface water and foul water drainage requirements for new developments. The application is accompanied by a Flood Risk Assessment and Drainage Strategy to address these issues.
- 4.33 Policy SG14 sets out the principles for achieving good design and requires that all new developments are of a high standard of design and layout to reflect local distinctiveness; the historic pattern of development in the locality, the character, form and style of existing buildings nearby and their architectural detailing.

- 4.34 Policy SG16, requires new development to provide appropriate parking and servicing arrangements.
- 4.35 Policy SG17, aims to protect the residential amenity of existing neighbouring properties and states that permission will be granted for development which would not cause harm to residential amenity taking into account issues of overlooking, overshadowing and loss of privacy.
- 4.36 Policy SG18, 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. In this case landscaping is considered to be key for the design of the development and as such existing landscape features will be retained where possible. This includes the established trees and ornamental shrubs on the site frontage that serve to provide an attractive and natural edge to the development.
- 4.37 Policy HS7, states that outside the defined settlement limits of Spalding, the Area Centres and Group Centres, new housing will only be permitted for small scale, rural exception affordable housing. This acts as a restrictive policy to housing growth and is not therefore in accordance with the Government's objective for 'significantly boosting the supply of housing' (paragraph 47).
- 4.38 Policy HS8, requires, residential developments of three or more dwellings, to make provision of a minimum of one third of the residential dwellings as affordable housing.

Emerging South East Lincolnshire Local Plan

- 4.39 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.
- 4.40 The Council's consulted upon the Draft Local Plan between 8th January 2016 and 19th February 2016. A submission draft will be published later in the year and be subject to a further period of public consultation prior to its submission to the Secretary of State towards the end of the year. The Plan will then be subject to a Public Examination,

which is likely to take place within the first quarter of 2017 with the Plan being adopted later that year.

- 4.41 In accordance with Government Policy the draft plan reiterates in Policy 1, the Framework's presumption in favour of sustainable development.
- 4.42 Policy 2 sets out the Council's general approach to where new development should be directed, the proposed development hierarchy, follows that of the adopted Local Plan. Lutton and Lutton Gowts are categorised within Group C, 'Other Service Centres and Settlements where development will be supported' where it supports the role of the service centre or helps to sustain existing facilities, or meets the service needs of other local communities.
- 4.43 With regard to affordable housing, the emerging Policy 15 provides a more realistic and flexible approach than the adopted Local Plan. The Policy sets a threshold of 10 units or more, before any affordable housing is required to be provided. It further accepts that it is sometimes more appropriate, depending on the size and location of the site for the affordable requirement to be provided off-site, or an equivalent financial contribution to be provided, to enable the need to be met elsewhere.

5. Planning considerations

- 5.1 The key considerations in the determination of this planning application are:
- i. the principle of residential development in this location
 - ii. housing land supply and deliverability
 - iii. the effect of the development on the character of the surrounding area

The principle of residential development in this location

- 5.2 The application site is located adjacent to existing residential development and a short distance from services and facilities within the village of Lutton, these include a post office, primary school and public house all of which would be expected to be found within a local service centre. The site is within walking distance of a Community College and a range of leisure facilities within Lutton Gowts and is accessible to a full range of shops services and facilities in the market town of Long Sutton. The scheme has the same level of accessibility to

local services as existing properties within Luton Gowts and, therefore, the location must be considered sustainable.

- 5.3 Paragraph 55 of the NPPF seeks to promote sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities including, where development in one village may support services in a village nearby. The location of the site in proximity to local community facilities within Luton Gowts and other services and facilities in the nearby village of Luton would constitute sustainable development that would help maintain the vitality of both the local and wider rural community. The proposal therefore accords with paragraphs 14, 49 and 55 of the NPPF.

Housing Supply and deliverability

- 5.4 The need to plan for, and provide adequate land for, housing is underpinned by the Government's strategic housing policy objectives. It is, therefore, a policy requirement and an important material consideration in the determination of this application.
- 5.5 Paragraph 7 of the NPPF identifies the supply of housing as the key component of the social role of sustainable development as follows:

'A social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations.....'

- 5.6 Paragraph 47 of the NPPF states that 'to boost significantly the supply of housing local planning authorities should' (in summary)
- Ensure that their local plan meets the full, objectively assessed needs for market and affordable housing
 - Identify key sites which are critical to the delivery of the housing strategy over the plan period
 - Identify and update annually a supply of specific deliverable sites sufficient to provide five-years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to

ensure choice and competition in the market for land,

- Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period)
- Illustrate the expected rate of housing delivery through a housing trajectory for the plan period and a housing implementation strategy describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.

- 5.7 NPPF paragraph 49 states '*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*'.

South Holland District Housing Land Supply

- 5.8 The Council's published housing land supply at December 2015 sets out the following conclusions:

A	Housing target for the plan period (2011-2036)	10,750
B	Annual housing target across plan period (A /25 years)	430
C	Five year supply – no adjustment	2,150
D	Shortfall in housing from earlier in plan period (requirement less completions)	973
E	Five year supply target incorporating shortfall (C + D)	3,123
F	Buffer 20%	625
G	Five year supply incorporating buffer (E + F)	3,748
H	Annual target for next five years (G / 5)	750
I	Current expected deliverable supply 31.12.2015 - 31.12.2020	2,261
J	Gap (G – I)	1,487
	Council's housing land supply equivalent to (I / H)	3 years

- 5.9 The Council's Five Year Supply of Housing Assessment of 2015 confirms that, based on their current estimations, the Council cannot demonstrate a 5-year supply of deliverable housing sites. The NPPF advises that where a LPA cannot

demonstrate an up-to-date five-year supply of deliverable sites, they should favourably consider applications for housing.

- 5.10 Furthermore, the Core Strategy was adopted in 2006. The Development Plan therefore pre-dates the National Planning Policy Framework by six years. The NPPF states that where the development plan is absent, silent or relevant policies are out-of date (in this case little weight can be attached to the Council's housing policies including Policies SG4, HS4 and HS7 of the adopted Local Plan as these are inconsistent with the NPPF) the focus should be on the test in paragraph 14 which states that, *'planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole'*.
- 5.11 The starting point for the consideration of this application should be that the LPA cannot demonstrate a 5-year supply of deliverable land for housing and therefore little weight can be attached to the policies of the development plan.
- 5.12 The application site is in accordance with national and local plan policies when taken as a whole, is available for development, offers a suitable location for the re-use of a previously developed site, and will contribute to the enhancement of a sustainable rural community. In addition, the housing could be delivered at an early stage, which will help to remedy the Council's current shortfall in housing.

The effect of the development on the character of the surrounding area

- 5.13 One of the guiding principles of this development proposal has been to ensure that the landscape quality of the site is not eroded, but enhanced by the close integration of the development and the existing attractive landscaped frontage to the site. The proposed dwellings will be set back from the road consistent with the existing building line. Each dwelling will sit within an appropriately sized garden. Boundary treatments to rear gardens will comprise close board fencing and native hedging to ensure the privacy of existing and future residents and to meet the Council's amenity guidelines set out in Policy SG17.
- 5.14 The relationship of the proposed dwellings with the existing dwellings to the north and south has been carefully considered and the proposed dwellings respect the character,

scale, density and massing of development within the immediate locality. The proposal makes efficient use of previously developed land ensuring that residential densities are maximized without compromising residential amenity, the character and appearance of the settlement, or the wider rural landscape.

- 5.15 Furthermore, the design of the five individual dwellings reflect the feature, fenestrations and materials of nearby properties and others within the local area to ensure that the development successfully integrates within its context and makes a positive contribution to the character of the surrounding area.
- 5.16 The overall result is a planning application that will provide positive benefits through the delivering a high quality residential scheme on a sustainably located site within the existing settlement of Lutton Gowts and accessible to the Centre of Long Sutton.

6. Conclusions

- 6.1 The site is in a sustainable location within the existing settlement of Lutton Gowts, adjoining existing residential development. The site is well related to the main town centre of Long Sutton and has access to a range of facilities and services.
- 6.2 Although this is outside of the settlement boundary of Long Sutton, it is important to recognise that priority should be given to the redevelopment of previously developed sites particularly in an area where there is limited brownfield land available to meet the housing requirements that have been forecast for the District.
- 6.3 The proposed scheme will provide a low-density housing development of a design that is sympathetic to the character of the area and the surrounding landscape. The impact of the development on the amenity of adjoining occupiers has been appropriately addressed.
- 6.4 The proposed development of land at Silverhill accords with many elements of the statutory development plan and, given the advice of paragraph 14 of the NPPF, planning permission should be granted. The benefits arising from the implementation of the proposals described in the planning application are not significantly or demonstrably outweighed by any adverse policy impacts deemed to arise from the provision of new housing in this location. In this case the proposals offer significant environmental gains and improved residential amenity to adjoining properties.
- 6.5 Taking all of the above into consideration, together, with the significant shortfall of housing within the district as a whole, it is considered that the balance of arguments fall in favour of this development.

In summary the application scheme will:

- Deliver much needed housing, to assist the Council in meeting its housing land supply targets
- Deliver high quality architecture and urban design
- Enhance and protect local services and facilities.