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30TH JULY 2019

LUCY BUTTERY
PLANNING OFFICER
SOUTH HOLLAND DISTRICT COUNCIL
PRIORY ROAD
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DEAR LUCY

RE PROPOSED STATIC CARAVANS FOR USE BY MIGRANT WORKER AT SMALL DROVE LANE, WEST PINCHBECK FOR E.M COLE (FARMS) LTD
YOUR REF H14-0029-19

FURTHER TO TELEPHONE CONVERSATIONS WITH YOURSELF I ENCLOSE ADDITIONAL INFORMATION IN SUPPORT OF THE PLANNING APPLICATION.

1.0 PLEASE ALSO REFER TO CORRESPONDANCE FOWARDED TO SHARON NOLAN AT THE ENVIRONMENT AGENCY DATED 23RD JULY 2019 AND COPY ALSO TO YOURSELF ON SAME DATE.

2.0 IN THE NPPF AND ITS GUIDELINES THERE IS AN ALLOWANCE / POSSIBILITY OF DEVELOPMENT IN AREAS OF FLOOD RISK

2.1 PARAGRAPH 160 FROM THE NPPF

160. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. For the exception test to be passed it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

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2.2 PARAGRAPH 24 FROM NPPF GUIDANCE

How can wider sustainability benefits to the community that outweigh flood risk be demonstrated?

Evidence of wider sustainability benefits to the community should be provided, for instance, through the sustainability appraisal. If a potential site allocation fails to score positively against the aims and objectives of the sustainability appraisal, or is not otherwise capable of demonstrating sustainability benefits, the local planning authority should consider whether the use of planning conditions and/or planning obligations could make it do so. Where this is not possible the Exception Test has not been satisfied and the allocation should not be made.

2.3 WITH REFERENCE TO NPPF PARAGRAPH 160 ITEM A SUSTAINABLE DEVELOPMENT IS DEFINED IN THE NPPF AS

2. Achieving sustainable development

7. The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs[4].

8. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

   a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

   b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

   c) **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

9. These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development** (paragraph 11).

2.4 ECONOMY

2.41 AT PRESENT AGENCY STAFF ARE EMPLOYED DUE TO LACK OF LOCAL WORKERS AND DIRECTLY EMPLOYED MIGRANT LABOUR. THIS AGENCY STAFF IS PRESENTLY BEING TRANSPORTED FROM KINGS LYNN AND WISBECH IE FROM OUTSIDE THE AREA.
IF THE INSTALLATION OF THE CARAVANS IS PERMITTED THE OCCUPANTS WILL BE USING LOCAL SHOPS AND FACILITIES EG FOR FOOD, CLOTHING, PUBLIC TRANSPORT, SOCIAL VENUES ETC.

2.42 THE APPLICANTS BUSINESS ITSELF - IF THE APPLICANT CANNOT PROVIDE ACCOMODATION THEY CANNOT OBTAIN THE MIGRANT LABOUR THEY NEED, AND THE APPLICANT HAS STATED THAT THIS WILL DEFINATELY SEPARAISE FUTURE GROWTH/EXPANSION AND THAT THERE IS THE POSSIBILITY OF THE EXISTING BUSINESS GOING INTO RECESSION

2.5 SOCIAL

2.51 ITEM 4 IN THE DESIGN AND ACCESS STATEMENT

> 4 THE APPLICANTS HAVE NO BUILDINGS ON THE SITE THAT ARE SUITABLE OR SUITABLE FOR CONVERSION TO RESIDENTIAL USE. THE APPLICANTS HAVE LOOKED INTO PURCHASING BRICK AND MORTAR DWELLINGS FOR USE BY THEIR MIGRANT LABOUR BUT ARE AWARE OF THE PROBLEMS THAT THIS CAN INCUR
> EG - COMMENTS FROM LOCAL POPULATION THAT BUYING PROPERTIES FOR MIGRANT WORKERS MEANS THERE IS LESS HOUSING FOR LOCALS AND THE RESENTMENT THIS CAN CAUSE
> - PROBLEMS IN OBTAINING USE AS H.M.O
> - COMPLAINTS FROM NEIGHBOURS - AS HIGHLIGHTED IN THE LOCAL NEWSPAPERS
> - SECURITY OF PROPERTY WHEN NOT IN USE

HAVING ACCOMODATION ON SITE AGAINST USING LOCAL HOUSING STOCK REMOVES THIS SOCIAL PROBLEM

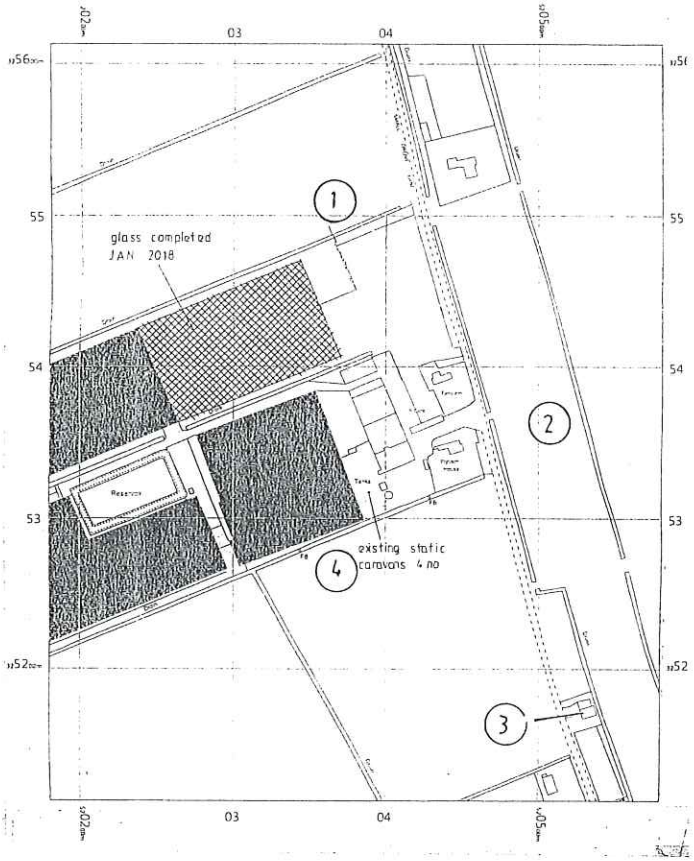
2.6 ENVIRONMENTAL

2.61 THE PLANNING APPLICATION HAS LOCATED THE CARAVANS WITHIN THE FARMYARD CURTILAGE TO MINIMISE ITS IMPACT ON THE WIDER LANDSCAPE. SEE ALSO ITEMS 10 AND 11 IN THE DESIGN AND ACCESS STATEMENT.

2.62 WHEN THE APPLICANT CARRIED OUT THE LATEST GLASSHOUSE DEVELOPMENT THEY ANTICIPATED EXTRA STAFF AND ITS REQUIREMENTS FOR ACCOMODATION. SPACE WAS ALLOCATED IN THE DEVELOPMENT ALONG WITH ACCESS BY EMERGENCY VEHICLES. ELECTRIC AND WATER SERVICES ALLOWED FOR, ALL MAKING EFFECTIVE USE OF THE LAND

CONT

2.63 THE QUESTION HAS BEEN ASKED CAN THE CARAVANS BE SITED ELSEWHERE AND WITH A LESSER RISK AT FLOODWATER DEPTHS.
ALL OF THE LAND WITHIN THE FARMYARD CURTILAGE AND THE SURROUNDING AREA IS AT RISK FROM FLOODING, THE FOLLOWING ARE SITES DISCUSSED WITH THE APPLICANT.



NORTH

SITE PLAN 1-5000

ALTERNATE SITE (1) FIELD TO NORTH OF FARMYARD
- FLOODWATER DEPTH IN ZONE 0.5 TO 1.0 METRE
- MORE EXPOSED / VISIBLE IN WIDER LANDSCAPE
- AT PRESENT THIS FIELD IS FARMED AND TO TAKE A CHUNK OUT WILL CAUSE PROBLEMS FARMING THIS FIELD USING MODERN FARMING METHODS
- NO SERVICES TO THIS SITE
- AREA NEEDS TO BE KEPT CLEAR FOR POSSIBLE FUTURE GLASSHOUSE EXPANSION.

ALTERNATE SITE (2) FIELD TO EAST SIDE OF SMALL DROVE LANE. DUE TO BEING A LONG NARROW FIELD CARAVANS WOULD NEED TO BE SITED AT NORTH OR SOUTHERN END, NOT IN BETWEEN

NORTHERN END
- ADJACENT TO DWELLING
- NO SERVICES TO THIS SITE
- FLOOD WATER DEPTHS 0.25 TO 0.5 METRES
- OPEN TO VIEW FROM EAST, SOUTH, WEST INCLUDING FROM SMALL DROVE LANE

SOUTHERN END
- PROXIMITY TO NUMEROUS RESIDENTIAL PROPERTIES
- POSSIBLE FLOOD WATER DEPTHS 0.5 TO 1.0 METRE
- EXPOSED TO VIEWS FROM EAST, WEST AND NORTH

ALTERNATE SITE (3) EXISTING PROFILED METAL AND ASBESTOS CEMENT CLAD SHEDS
- ELECTRIC AND WATER SERVICES EXISTING
- POSSIBLE FLOOD WATER DEPTHS 0.5 TO 1.0 METRE
- PROXIMITY TO NUMEROUS RESIDENTIAL PROPERTIES
- SUITABILITY OF BUILDINGS RE CONVERSION. ?

ALTERNATE SITE (4) FIELD TO SOUTH OF FARMYARD
- NO SERVICES TO SITE
- POSSIBLE FLOOD WATER DEPTHS 0.25 TO 0.5 METRES
- EXISTING LANDSCAPING ON ROADSIDE BUT VISIBLE FROM SOUTH AND WEST
- AT PRESENT THIS FIELD IS FARMED AND TO TAKE CHUNK OUT WILL CAUSE PROBLEMS FARMING THIS FIELD USING MODERN FARMING METHODS
- AREA NEEDS TO BE KEPT CLEAR FOR POSSIBLE FUTURE GLASSHOUSE EXPANSION

ALTERNATE SITES 1, 2 AND 4 WOULD TAKE UP LAND THAT IS CURRENTLY FARMED AND TO VARYING DEGREES ARE MORE VISIBLE IN THE WIDER LANDSCAPE THAN THAT IN THE APPLICATION AND AS SUCH NOT CONSIDERED TO BE MAKING BEST USE OF THE LAND PLUS WILL INTERFERE WITH POSSIBLE EXPANSION.

2.7 PARAGRAPH 160 FROM THE NPPF ITEM B

> b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

2.71 THIS HAS BEEN COVERED IN - FLOOD RISK ASSESMENT BY GEOFF BEEL CONSULTANCY AND HIS E MAIL DATED 3-5-2019

3.0 SOUTH HOLLAND DISTRICT COUNCIL FLOOD MAPS
DUE TO THE SCALE OF THE MAPS THE FLOOD DEPTH ZONES HAVE BEEN SUPERIMPOSED UPON IT IS NOT AS CLEAR AS THE ENVIRONMENT AGENCY MAPS OF WHERE CHANGES IN ZONES OCCUR. TO THIS END I HAVE HAD THE SHDC MAP ENLARGED AS MUCH AS POSSIBLE AND THEN USING THE ONE KILOMETRE GRID LINES AS A SCALE BAR WITH THE CENTRELINE OF SMALL DROVE LANE AS A FIXED POINT, ALONG WITH SOUTHERN BOUNDARY OF THE RESIDENTIAL PROPERTY TO THE EAST SIDE OF SMALL DROVE LANE SUPERIMPOSED THE ZONE CHANGE IN FLOOD DEPTHS ONTO THE SITE PLANS.

3.0 CON'T

AS CAN BE SEEN 3 OF THE 4 CARAVANS ARE IN FLOOD DEPTH ZONE 0.25 TO 0.5 METRES IN DEPTH AND THE PROPOSED FINISHED FLOOR LEVELS PROPOSED IN MY CORRESPONDANCE DATED 23RD JULY 2019 WILL ENSURE FLOORS WILL BE ABOVE POSSIBLE LEVELS OF FLOOD WATERS

I TRUST THAT THIS LATEST INFORMATION ALONG WITH PREVIOUS CORRESPONDANCE FROM G DEEL CONSULTANCY AND MYSELF HAS RESOLVED THE ISSUES RAISED BY THE ENVIRONMENT AGENCY AND YOURSELF AND THAT PERMISSION CAN NOW BE GRANTED; BUT SHOULD YOU HAVE ANY QUERIES PLEASE DO NOT HESITATE TO PHONE MYSELF

REGARDS

Robert

ENCLOSE DRAWING 3493-1 REV D
CC SHARON NOLAN AT ENVIRONMENT AGENCY
CC GEOFF DEEL CONSULTANCY