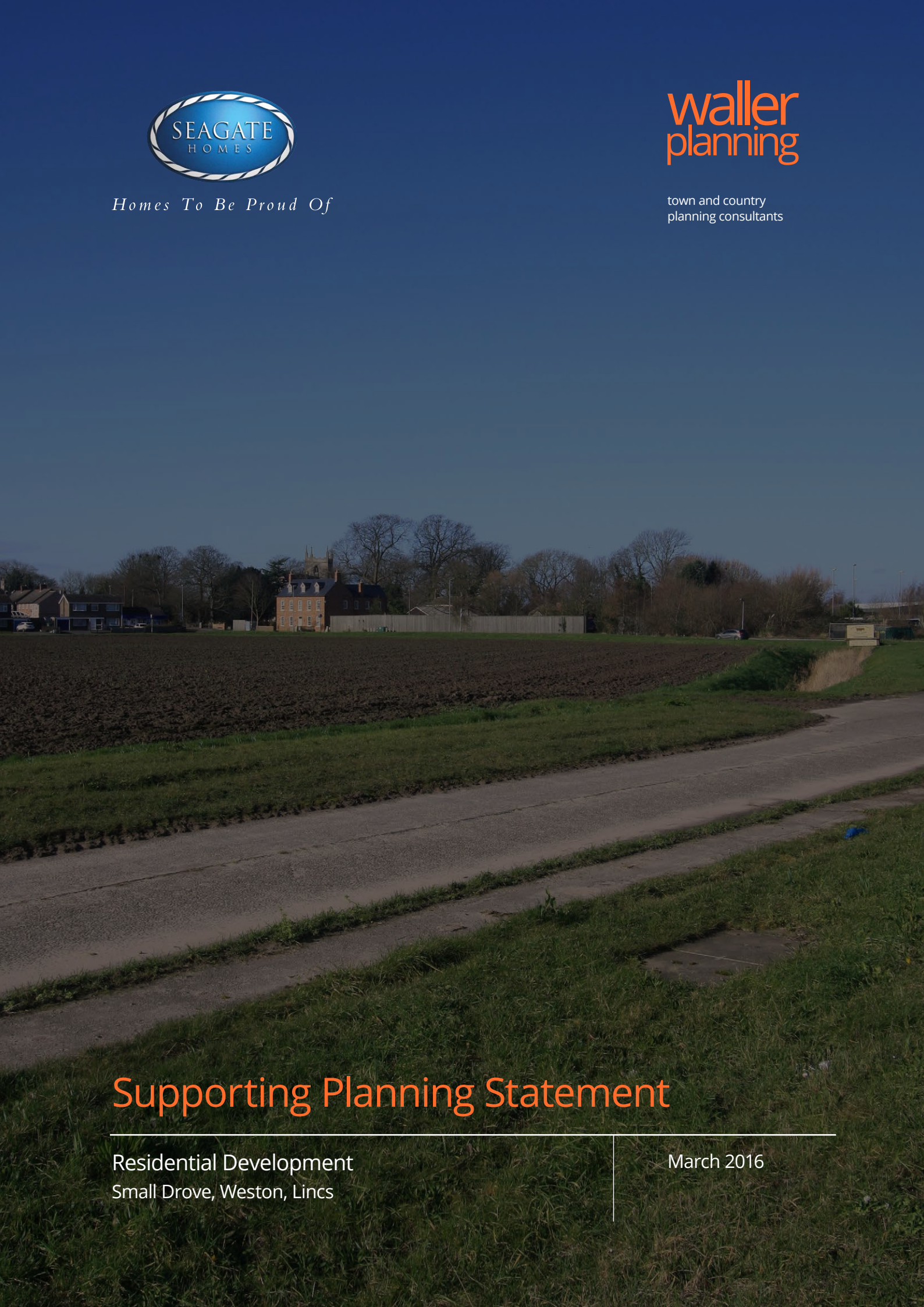
SEAGATE HOMES

Homes To Be Proud Of

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planning consultants



Supporting Planning Statement

Residential Development

Small Drove, Weston, Lincs

March 2016

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STUDIO11 architecture

The Site Layout

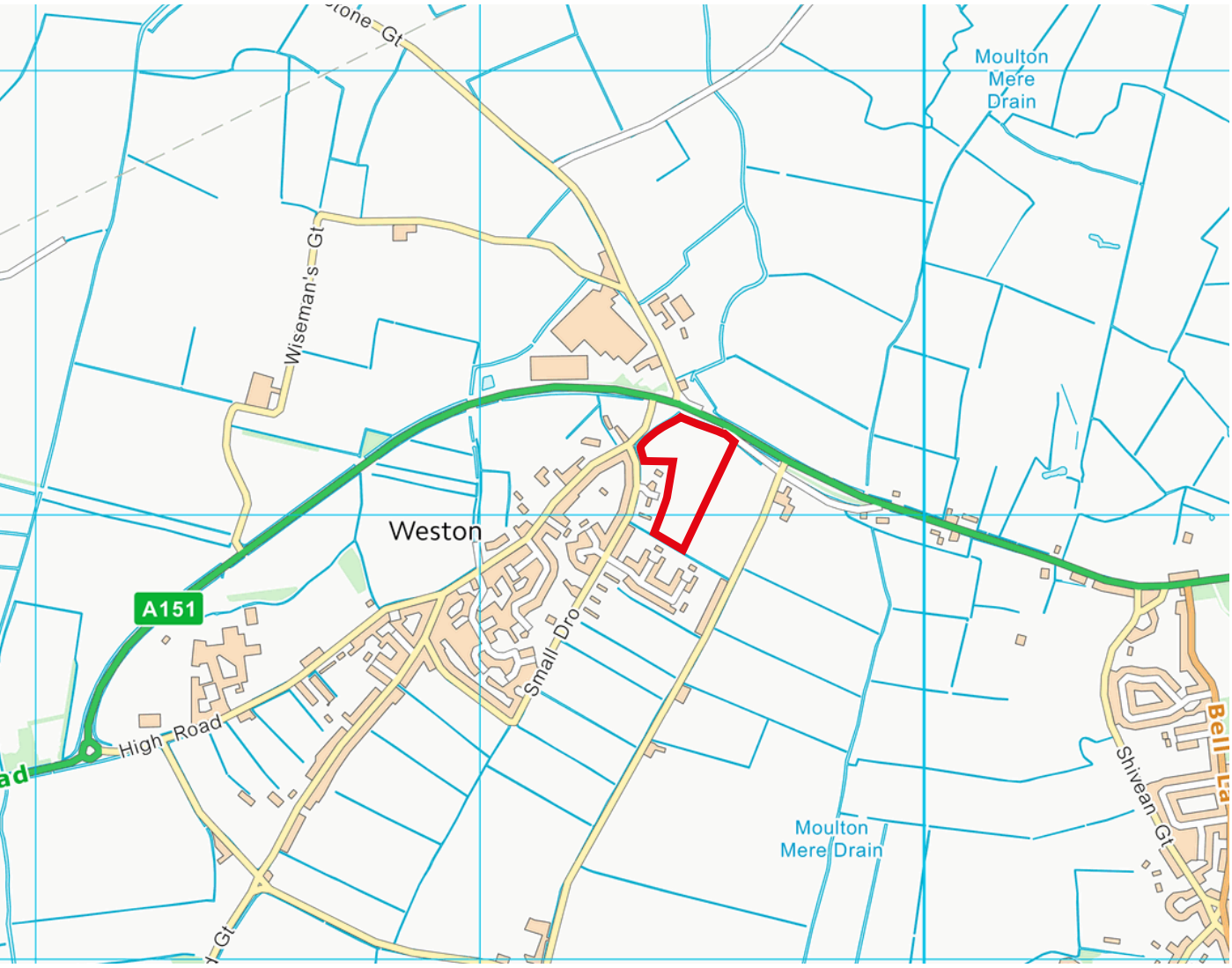
Introduction

1.1 This Supporting Planning Statement accompanies a full planning application by Seagate Homes Ltd, for a residential development comprising 60 new dwellings, on land at Small Drove and Dean Close, Weston. The proposals would provide a mix of 1, 2, 3 and 4 bedroom homes, including both market and affordable housing, and also houses and bungalows. They have been designed to meet the needs of a wide range of local people.

1.2 The application responds to a significant shortfall in the provision of identified housing land, required to meet local needs. In this context, local planning policies relating to the supply of housing are considered out of date, and it is necessary for new planning applications such as this one to come forward to meet this need.

1.3 The application site has also been identified by Officers in their evidence base for the emerging South East Lincolnshire Local Plan, as a location which would be suitable for meeting future housing needs. This application seeks to meet those needs more quickly, in response to the immediate need for housing, and national planning policy requirements.

1.4 This Statement considers the proposed development in the context of local and national planning policy. We believe that it is entirely acceptable in planning terms, and so it should be granted planning permission without delay, in accordance with the presumption in favour of sustainable development.



The Application Site, outlined in red
Scale 1:15,000

Contextual Appraisal

The Site's Location

2.1 The application site is located on the north eastern edge of the village of Weston, but close to its historic core. To the west and south, the application site is bordered by residential development. The A151 runs close to the site's northern edge. To the east is agricultural land and Delgate Bank Road.

2.2 The site is immediately adjacent to the Weston Village Stores, a well stocked local convenience shop. It is also close to other facilities within the village, including St Mary's Primary School, the village hall, St Mary's Church, and the Chequers pub. At the opposite end of the village is the Baytree Garden Centre, which also sells a range of goods, and contains a café and restaurant. This is therefore a well equipped village, which is relatively self-sufficient for a settlement of its size.

2.3 Weston also has good public transport connections. Two bus stops are located on High Road, within a couple of minutes' walk of the site. These stops provide a regular bus service, with 2–3 buses an hour, Monday to Friday, and 1 per hour on Sundays. The bus service connects Weston with Spalding and Holbeach, with timetables that enable commuting, as well as a dedicated school service.







Local facilities within Weston

2.4 The site is close to sources of employment, such as the industrial development to the north and the Baytree Garden Centre. A greater range of jobs are available in the nearby towns of Spalding and Holbeach, which are both only around 5–10 minutes' drive away.

2.5 In three directions, the surrounding landscape is dominated by urbanising influences. There is housing to the west of the site on Small Drove. A cycle lane and the Old High Road, now a small service road, run along the north of the site. Just beyond is the A151, which also has a significant presence in the local landscape. Industrial development on Stone Gate is clearly visible to the north west. Beyond the bypass to the north, agricultural land is visible, while there is some residential development along the main road to the north east. Further housing along Delgate Avenue is immediately adjacent to the site's southern edge. Only to the eastern side does the side abut a clearly rural landscape. As such, we believe that the application site elates well to the existing semi-urban form of the area, and its development would not have any great urbanising effect on the local landscape.

2.6 St Mary's Church is a Grade I listed building, and also a Scheduled Ancient Monument. There are further Grade II listed structures in the churchyard. These are designated heritage assets, and it is necessary to consider how the application proposals may affect the building's setting. This is considered in the Heritage Statement which accompanies this application, and in Section 5 below.





The landscape surrounding the site is dominated by the A151 and existing housing and industrial development

The Application Site

2.7 The application site is agricultural land, comprising two fields. It is surrounded on its northern side by a deep drainage ditch, with access points along its length.

2.8 The Environment Agency's Flood Map identifies the site as lying within Flood Zone 2. Whilst the South Holland Strategic Flood Risk Assessment 2010 (SFRA) identifies the site as lying within Flood Zone 1, and so not being at risk of flooding, we have been advised by South Holland District Council that the SFRA is currently being revised. We therefore understand that the Environment Agency's Flood Map is considered to be more reliable, being based on more recent information. This implies that the site does lie largely within Flood Zone 2, with small areas within Flood Zones 1 and 3a. It is therefore necessary to consider the flood risk sequential test, which we do in Section 6.

2.9 The site is accessible from the west via Dean Close and it also has highway frontage with the Old High Road to the north and Small Drove to the west.

The Proposed Development

3.1 Seagate Homes Ltd propose the construction of 60 new homes. These would include a range of types of housing, as follows:

Schedule of Development		
Affordable Housing	1 Bedroom Houses	4
	2 Bedroom Houses	8
	3 Bedroom Houses	8
Sub-total		20 (33%)
Market Housing	3 Bedroom Houses	15
	4 Bedroom Houses	14
	3 Bedroom Bungalows	11
Sub-total		40
Total		**60**

3.2 The new development would provide a generous amount of public open space to the western and northern side of the development, amounting to 23% of the site's overall area. This would include new landscape planting and a childrens' play area; this would be a Local Area for Play, or LAP, aimed at younger children.

3.3 The proposed residential development has also been designed with the intention that it would not have any unacceptable adverse effects on the amenity of existing residents. New housing would generally back on to existing housing, on Dean Close and Delgate Avenue, to ensure that there was a good degree of separation between them. Where housing would be closer, it would be orientated to be side-on to the existing housing, without any windows overlooking that property. This would ensure that there would not be any unacceptable loss of privacy.

3.4 Surface water would be attenuated within the application site, either infiltrating the ground directly, or being held within a detention pond, and then released to the drains which surround the site at a controlled rate. Surface water flow from the site would be controlled, to ensure it did not exceed current greenfield runoff rates. Easements have also been provided to the drains at the site's western and southern boundaries, to allow for their future maintenance by the drainage authority.

3.5 New trees would be planted within the site, particularly along its northern and eastern boundaries, to soften the development's appearance when viewed from a distance. This is intended to provide a suitable green edge to the village, with a transition between the housing and surrounding countryside.

3.6 Vehicular access would be via a recent residential development on Dean Close, which itself links to Small Drove. New footpath links would be created to Small Drove via Dean Close, and directly to the High Road to the north. These would provide good pedestrian access to the village's facilities and the local bus service.



Some of the proposed house types.

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 (2006) and the Lincolnshire Minerals and Waste Plan. In addition, the policies of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG) constitute important material considerations.

4.2 However, paragraph 215 of the NPPF states that where Local Plans are out of date, '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 will vary 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 greater weight than the Local Plan's policies, where these policies are both out of date and inconsistent with the NPPF.

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.

National Planning Policy Framework (March 2012)

4.3 The National Planning Policy Framework (NPPF) sets out the Government's policy with regard to planning, and it is the basis for all planning decisions today.

4.4 Paragraph 6 of the NPPF states that 'The purpose of the planning system is to contribute to the achievement of sustainable development'. This emphasis on the need for sustainable development is echoed throughout the NPPF. Paragraph 7 summarises the three dimensions of sustainable development as follows:

- 'an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- 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; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.'

4.5 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.'

4.6 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.

4.7 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...'

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

4.9 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.

4.10 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.'

4.11 The latter part of this paragraph indicates that policies in Local Plans which are out of date, as those of the South Holland Local Plan are, cannot be accorded full weight in decision making. This should be read alongside paragraph 215 of the NPPF, noted above, whereby out of date policies are accorded weight only according to their degree of consistency with the NPPF.

4.12 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'.

4.13 With regard to flood risk, Paragraph 100 states that:

'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.'

4.14 This approach is elaborated in paragraphs 101 – 103 of the NPPF. These paragraphs outline the function of the sequential test, which requires the application of a sequential approach to locating new development. Its aim is to locate necessary development in areas of the lowest risk of flooding first, but then in areas at greater risk where this is not possible.

National Planning Practice Guidance

4.15 The National Planning Practice Guidance (NPPG) is the Government's companion to the NPPF, an online reference tool which is constantly updated. It provides further guidance on the flood risk sequential test, which is summarised as follows:

4.16

'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.'[2]

2. National Planning Practice Guidance, Reference ID 7-018-20140306

South Holland Local Plan (2006)

4.17 We set out here the Local Plan policies which we believe are most relevant to the application proposals.

4.18 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'.

4.19 In addition, this policy requires new development to comply with three criteria, and these are set out below, alongside the application's response.

	Policy SG1 Requirement	Application Response
1	The quality of life for residents is unimpaired or enhanced.	The application proposals would not in any way impair residents' quality of life, and they would provide high quality and accessible housing to meet local needs, bringing social and economic benefits.
2	Reasonable measures have been taken to conserve energy and natural resources.	The proposals would comply with all national guidelines for energy efficiency and the use of natural resources.
3	South Holland's essential character and main environmental assets are not damaged.	The proposals would not result in any unacceptable harm to the District's essential character. We have explained in Section 2 that the application site lies within a landscape dominated by urban influences, whilst the site would benefit from a mature landscape setting on its eastern and northern sides. As such, there would be no unacceptable impact on the landscape or local character. There would also be no damage to the District's main environmental assets.

4.20 Policy SG2, Distribution of Development also sets out criteria with which new development must comply, and these are again set out below, alongside the application's response.

4.21 Policy SG3 identifies Weston as a Group Centre, the third tier within the settlement hierarchy. The Policy allows for 'a moderate level of growth' within the village. Weston is therefore considered a viable location for development within the current Local Plan.

4.22 Policy SG4, Development in the Countryside, concerns development proposals which are located beyond defined settlement limits. It seeks to restrain development in these locations, unless it can be demonstrated that it cannot be accommodated within existing settlements, and it would not have an unacceptable impact on the landscape. We believe that the proposed development complies with these requirements, but we also note that this policy is in any case rendered out of date due to the current shortfall in the housing land supply, as explained in Section 5.

	Policy SG2 Requirement	Application Response
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.	It has already been established in the Council's emerging Local Plan (see below) that there are not sufficient sites within Weston, or other settlements in the District, to meet the need for housing. The emerging Local Plan also identifies the application site as being a preferred location for meeting housing need.
2	Make efficient use of land.	We believe that the proposed development makes an efficient use of land. It would provide 60 dwellings, at a net density of 22 dwellings per hectare. This allows for a development which includes a generous amount of open space, 23% of the site's area, and good sized rear gardens, in response to the shortage of open space within the village, and the need for a range of housing including family housing and bungalows.
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.	Weston is well served by public transport, as well as being a sustainable settlement in its own right. The application site is only a few minutes' walk from convenience shopping and various local facilities. It is also less than 5 minutes' walk from bus stops which provide a regular service to Spalding and Holbeach. It is well placed in comparison to other potential locations towards the southern end of the settlement.
4	Ensure that the development is acceptable in terms of traffic generation and road safety in the surrounding area.	The proposed development would not generate any unacceptable impact on local roads. This is further explained in the Transport Statement which accompanies this application.

4.23 Policy SG7, Energy Efficiency, requires new developments to achieve maximum efficiency through site design and orientation. The proposed development would provide energy efficient new homes, which would meet the essential requirements of this policy, and further details are included in the Sustainability Statement which accompanies this application.

4.24 Policy SG11, Sustainable Urban Drainage Systems (SuDS), concerns the application of surface water drainage measures, where appropriate and relevant. The application proposals include the use of SuDS, and the requirements of this policy would be met, as explained in the Drainage Strategy which accompanies this application.

4.25 Policy SG17, Protection of Residential Amenity, states that permission will be granted for development which would not cause harm to residential amenity. We have noted when describing the proposed development in Section 3 above that the amenity of neighbouring residents would be protected, and so this policy would be complied with.

4.26 Policy SG18, Landscaping of New Development, 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. The proposed development would retain the existing landscaping which surrounds the site, and provide considerable new landscape planting, in order to allow for it to be better assimilated within the landscape.

4.27 Policy HS7, New Housing in the Open Countryside including other Rural Settlements, identifies that outside defined settlement limits proposals for housing will only be permitted where they are for small scale rural exception affordable housing. As with Policy SG4, this policy is rendered out of date by the shortfall in the housing land supply.

4.28 Policy HS8, Affordable Housing, requires one third of the dwellings, within residential developments of three or more, to be provided as affordable housing. 20 of the 60 dwellings proposed on site are intended to be affordable homes, in compliance with this policy.

4.29 Policy HS11, Open Space in New Residential Developments, requires at least 14% of the site area of new residential development to be provided as open space. 23% of the proposed development is proposed to form open space, and so again the requirements of this policy would be satisfied.

Emerging South-East Lincolnshire Local Plan

4.30 Once adopted, the South East Lincolnshire Local Plan will set out planning policies for the period up to 2036. It is being jointly produced by Boston Borough Council and South Holland District Council, and it will eventually replace the South Holland Local Plan 2006. Work on the new Local Plan is currently underway, and a consultation has recently been held in relation to a draft Local Plan document. The Councils envisage that a final consultation will take place later in 2016, with the expectation that the Plan may be adopted in 2017.

4.31 At this stage, the Emerging Local Plan remains at an early point in its preparation, and it cannot be given full weight in planning decisions. However, it is useful as an indicator of the Councils' latest evidence, and the likely form of development in the future. The latest consultation draft identifies Weston as a Minor Service Centre, and seeks the provision of 230 dwellings in the village, between 2011 and 2036. Taking account of the low level of planning permissions granted and housing constructed in the period between 1st April 2011 and 31st March 2015, the majority of this requirement remains, with 218 homes still to be provided. The proposed development could therefore make a valuable contribution towards meeting Weston's long-term housing needs.

Weston Housing Paper

4.32 The Councils have also recently published further supporting evidence in relation to the emerging Local Plan. The South East Lincolnshire Local Plan: Housing Paper – Weston (January 2016) lists potential housing sites in the village sequentially in order of preference. The application site is second on the list, identifying it as a highly desirable location for future development. The first two preferred sites would both be required, if the Council's proposed housing target for Weston is to be met. The Council have calculated that the first ranked site (WSn003) could deliver up to 122 dwellings, whilst the application site (WSn022) is estimated to have a capacity of 78 dwellings. Together, this would provide 200 dwellings. So, the Councils' stated position is that the application site would be their preferred option for delivering the housing required in Weston over the next 20 years. We agree with this positive assessment of the merits of this site.

Strategic Housing Land Availability Assessment (SHLAA)

4.33 The Council's SHLAA 2016 is one of the key pieces of evidence which has informed the emerging Local Plan. It has been prepared recently by Officers, and was published in January 2016, alongside the latest consultation draft of the Local Plan. The SHLAA has informed the conclusions in the above mentioned Housing Paper. When considering the application site (WSn004 and WSn022), the SHLAA concludes the following:

- The site is 'available' for development, with no legal or ownership problems;
- Development on the site is considered 'achievable', due to a lack of technical constraints and reasonable end values;
- The site is of a suitable scale to fit in with the Council's proposals for Weston in the emerging Local Plan;
- The site's development would not have adverse impacts on natural, built or historic assets;
- The site's development would not lead to the loss of, or place undue burdens on, existing infrastructure, such as open space, green infrastructure, or community facilities;
- The site is therefore considered 'suitable' for development.

4.34 The SHLAA also identified that the site is currently unscreened by landscape features, and that open views are available into it. The application proposals have been designed with this in mind, to ensure that views of the new development would be softened

Weston Sustainability Appraisal

4.35 Another important part of the evidence base for the emerging Local Plan is the Sustainability Appraisal (SA). The Councils have published an individual SA for Weston, which considers each of the potential sites identified by the SHLAA, in the context of the Sustainability Objectives which have informed the emerging Local Plan document.

4.36 The SA notes that Weston does not currently have enough public open space to meet the needs of its existing residents. It also suggests that a residential development on this site should provide around 0.55 Ha of open space. We have already noted that the application proposals respond to this deficit, by providing more open space than is otherwise required by current planning policies, a total of 0.82 Ha in area, equivalent to 22% of the site's area.

4.37 The SA also notes the following:

- The site's proximity to the existing convenience store in Weston would mean that 'the site would create a development where sustainable modes of travel can be used in order to meet residents' everyday shopping needs'.

- By helping to meet the need for housing identified by the emerging Local Plan, the site's development 'could have a positive effect upon inclusivity by enhancing the range of properties available, including for those on a low income, older people and those with disabilities... Quality affordable and market housing could also generate more energy and water efficient homes which could help reduce fuel poverty and lower bills for residents.'

- 'Development on this site will generate employment during the construction period, which may involve apprenticeships or employment of the local long term unemployed, which could help improve job prospects and prosperity for residents, particularly young people.'

- 'Development of the site is not likely to have an adverse impact on the character and appearance of the area. It is located adjacent to, and has a good relationship with, the existing built-up area. Furthermore it is relatively well contained by residential development to the south-west and High Road to the north-west and north-east.'

Consideration of Planning Issues

The Current Need for Housing

5.1 The Council have identified that there is a shortfall in the five year housing land supply for South Holland[1]. This is summarised in the table below.

A	Housing requirement for plan period (2011 – 2036)	10750
B	Annual housing requirement across plan period (A / 25 years)	430
C	Five year requirement, no adjustment (B x 5)	2150
D	Shortfall in housing provision from earlier in plan period (requirement less completions)	973
E	Five year requirement incorporating shortfall (C + D)	3123
F	Buffer (20%)	625
G	Five year requirement incorporating buffer (E + F)	3748
H	Annual requirement for next five years (G / 5)	750
I	Current deliverable supply 2014/15 – 2018/19	2261
J	Gap (G – I)	1487
K	**Housing land supply in years**	**3**

5 Year housing Land Supply for South Holland District (SHDC, December 2015)

5.2 The housing requirement noted in this table relates to the Government's Household Projections, published by the Department for Communities and Local Government (DCLG) in February 2015. The Council's assessment states that this target has been selected in preference to previous targets, on the basis that they are the most recent and so the most accurate for the purpose of forecasting future housing needs, in accordance with the National Planning Practice Guidance (NPPG). However, we believe that the proposed target should be regarded as an absolute minimum, as it is based on a continuation of a suppressed trend, reflecting a period of recession. This implies that the housing target should be higher, and we have made representations to this effect in response to the emerging Local Plan.

5.3 The Council conclude that there has been a persistent failure to deliver sufficient housing, and so in accordance with paragraph 47 of the NPPF, they apply a 20% buffer to the housing requirement. They also seek to make up the shortfall in delivery in the period from 2012 within the immediate 5 year period, again in accordance with the NPPG. We agree with this methodological approach, as we believe that it best reflects the requirements of the NPPF and NPPG.

.....

1. See 6-Year Housing Land Supply Assessment (i.e. 5 years plus 20% buffer) as at 31st December 2015, South Holland District Council.

5.4 In this context, paragraph 49 of the NPPF states that 'policies for the supply of housing are out of date'. This policy approach is intended to ensure that housing can continue to be delivered to meet social and economic needs, even where a Local Plan is out of date. The South Holland Local Plan is very out of date, its policies for the supply of housing being based on the long defunct Lincolnshire Structure Plan.

5.5 This effectively means that policies which seek to restrict residential development to the defined limits of settlement boundaries, including Policies SG4 and HS7 of the adopted Local Plan (2006), are out-of-date and should be accorded relatively little weight, particularly when considered in the context of the importance which the NPPF places on meeting housing needs. Therefore, sites such as the application site may be considered suitable locations for residential development to meet immediate housing needs. We note that all 60 of the proposed dwellings could be delivered within the immediate 5 year period.

Proposed Housing Provision

5.6 The development proposed by this planning application would provide 60 new homes, of which 20 would constitute affordable housing. This would be a very valuable contribution towards meting the need for housing in Weston, and we have explained above that this site has been identified as one of the Council's preferred locations for housing to meet their target of 230 new dwellings in the village. The proposed housing is therefore a necessary form of sustainable development, which would meet local needs, both for the District and the village itself. We explain below some of the benefits that the proposed housing would bring.

5.7 It is also worthy of note that the proposed mix of affordable housing has been designed with the intention of meeting the Council's requirements. This implies that the development would be successful in meeting the specific requirements of those people seeking affordable housing locally.

5.8 The provision of new housing to meet an identified need is a material consideration which should be given great weight in the determination of this planning application. This is made clear by the NPPF, which notes at paragraph 49 that 'Housing applications should be considered in the context of the presumption in favour of sustainable development'.

A Sustainable Location for Development

5.9 Weston is a highly sustainable location for development. It is well provided with local services for a village of its size, including a shop, a post office, community and education facilities, as noted in Section 2. Many of the needs of local people can therefore be met within the village. This reduces the need for residents to use their cars, contributing both to the amenity of locals and the development of a low carbon economy. This view is echoed in the Council's Sustainability Appraisal for Weston, as noted in Section 4 above.

5.10 The South East Lincolnshire Joint Strategic Planning Committee's Assessment of Settlements and Their Sustainability Credentials (June 2015) gave Weston a score of 78 for sustainability, taking into account the the accessibility of services and facilities, public transport and sources of employment. This ranked the village 4th out of the 21 proposed 'Minor Service Centres', across South Holland District and Boston Borough. It is on the basis of these findings that the emerging Local Plan proposes allocate the development of 230 new houses to the village.

5.11 These documents indicate that the Council has a settled view of Weston as a sustainable location for development, due to its existing public services, amenities and employment opportunities, and the availability of further facilities within a short distance, which are themselves accessible by public transport.

Social Sustainability

5.12 The proposed mix of housing, from one to four bedrooms, would cater for a range of family sizes. Bungalows would be provided, to help meet the need for specialist accommodation for the elderly or for people with disabilities, who would prefer a bungalow to a house adapted for better accessibility. Furthermore, one third of the proposed housing (20 of the 60 dwellings proposed) would be affordable housing, in accordance with Local Plan Policy HS8. This housing would offer the prospect of homes for those on lower incomes, who cannot otherwise access housing which is suitable to their needs through the open market.

5.13 We have noted in Section 2 that Weston is well connected by bus to the nearby towns of Spalding and Holbeach. The current bus service allows for commuting, with a 9am arrival in the town and a return after 5pm. School transport is also provided to local secondary schools during term time. The nearest bus stop to the development is a short 250 metre walk away and bus services run between Spalding and King's Lynn at approximately 20 minute intervals 7 days a week. From Spalding, national rail services are available to many places including London. This is therefore a well connected location, in which people would not be isolated from services, employment or friends and family, irrespective of their income or access to a car.

5.14 The Weston SA notes the advantage to residents of a local shop within easy walking distance of the development site. Residents would benefit from being able to do much of their day-to-day shopping locally. The site is also within walking distance of sources of employment and local facilities including the primary school, St Mary's Church and the church hall.

5.15 The Weston SA also notes a lack of public open space in Weston. The proposed development would provide generous areas of public open space in the northern and eastern parts of the site, including a Local Area for Play (LAP) for younger children. The amount of open space proposed would exceed the requirements of Local Plan Policy HS11, which requires that 14% of the site should be set aside for public open space. 23% of the development would be set aside for this use. the SA also suggests that up to 0.55 Ha of the site should be set aside as open space, but the level of provision proposed is 0.82 Ha. The proposed development therefore has the potential to benefit existing residents by helping to make up the current deficit, as well as the new residents of the new development.

5.16 The details of the play equipment within the LAP and boundary treatments are to be agreed with the Council, and we envisage that these details can be set out in relation to a planning condition.

Economic Sustainability

5.17 The construction period for the proposed development would bring employment directly to Weston, and the Weston SA also notes that this has the potential to benefit those particularly in need, such as the unemployed and young people.

5.18 Residential development is also likely to increase the demand for existing services within the village, and so ensure that they are retained in the long-term. There has been a general trend nationally of declining services and facilities in rural communities, due in large part to increasing reliance on car travel, and changing trends whereby people will travel further to access even convenience shopping facilities. The additional local demand created by new residents is therefore necessary to ensure that the facilities Weston has are not lost over time.

5.19 The NPPF recognises that new residential development is a driving force for economic development. Paragraph 17 of the NPPF states that:

'...planning should... proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.' (Our emphasis)

5.20 The role that housing plays, as a driving force for a successful economy, is one of the main reasons that Governments are keen to boost house building in times of economic stress. In addition to the direct benefits outlined above, it is also the case that insufficient housing leads to serious negative effects, such as inflated prices and worsening affordability. It restricts choice in the market, encouraging those who can move further (generally higher earners) to move away, whilst those who cannot are forced to live in housing which does not meet their needs. For these reasons, paragraph 21 of the NPPF identifies 'any lack of infrastructure, services or housing' as a 'barrier to investment'.

5.21 Businesses will therefore naturally be drawn to areas with a good supply of housing. They will want to be in an area where all of their employees can find suitable housing, which is affordable to them. They will also want to be located in an area where there is a good range of housing available, from smaller, more affordable housing, to family housing and executive housing. A lack of any of these types of housing can deter businesses from locating in any one area.

5.22 An example of this can be found in evidence relating to the nearby town of Wisbech. Here, a recent study by the Cambridge Centre for housing and Planning Research found that the local economy was dominated by agricultural and manufacturing jobs, and that there were low and declining levels of jobs within the professional and associate professional fields. This report identified that one of the factors which was constraining Wisbech's economic potential was negative perceptions of the living and working environment it offers, and a lack of social infrastructure, which deters incoming professionals. It therefore made the following recommendation:

'There needs to be continued investment in social infrastructure provision. These place-making strategies to improve the quality of the living environment include providing a strong residential offer in order to attract and retain a skilled workforce.'[2]

5.23 The quality of the living environment within the District, and the quality of its housing stock, can therefore be seen to have a direct effect on the area's economic prospects.

5.24 In light of these considerations, it is clear that a sufficient amount, variety and quality of housing is required not only to avoid stagnation in the local economy and secure existing local jobs, but also to stimulate new economic growth. The houses proposed by this application would make a valuable contribution in this regard.

Environmental Sustainability

5.25 The application site currently represents a poor habitat for wildlife. It is intensively farmed, as is much of the surrounding land. It does not contain any natural landscape features, and so it offers little potential in terms of habitat or foraging ground for local wildlife. The only part of the site which is currently likely to contain much biodiversity is the boundary ditch and verge. This area would therefore be protected, and enhanced with new planting.

5.26 The proposed development can benefit biodiversity within the site, for example through new planting of shrubs and trees of native species, which can provide food and habitats for a variety of species. We anticipate that details of any ecological enhancement measures can be agreed in relation to a suitably worded planning condition.

5.27 The sustainability of the location in terms of the site's proximity to public transport routes and local facilities, including the primary school and convenience shop, would help to reduce the number of car journeys required, encourage more sustainable transport choices and therefore contribute to a low carbon economy.

5.28 The proposed new homes would also be far more energy efficient than the vast majority of existing homes, and they can contribute to an environmentally sustainable future by reducing the need to burn fossil fuels for heat.

Effect on Heritage Assets

5.29 The application site is around 80m at its nearest boundary from St Mary's Church, which is a Grade I listed building, and also a Scheduled Ancient Monument. The churchyard also contains Grade II listed grave stones from the 18th Century, a tomb dating from 1629, a war memorial Lych gate from circa 1918, and a standing cross. It is therefore necessary to consider the effect of the proposed development on these designated heritage assets. This is considered in the Heritage Statement which accompanies this application, but for completeness, we have also noted the main issues here.

2. Economic Analysis of the Wisbech Travel to Work Area (Cambridge Centre for Housing and Planning Research), March 2013, page 41.



St Mary's church

5.30 The listed building is well screened from the application site by existing mature trees within the churchyard, and there is limited inter-visibility between the Church building itself and the site, and the site forms a very limited part of the Church's setting. In contrast, the housing opposite the church on High Road forms a far more prominent part of its setting, and means that this setting already has a modern residential character. Some longer-distance views of the top part of the Church tower are available across the site, from the A151, with the application site in the foreground; however, these views also incorporate housing, and the development of the application site would not significantly change the way the Church is viewed.

5.31 We note that the Council's SHLAA concluded that the site's development **'will not have adverse impacts on natural, built or historic assets'**. We agree with this assessment, and believe that the proposals would not cause any notable harm to this heritage asset. We also note that, even if it were considered that there was some harm, it would certainly be **'less than substantial'**, in the context of paragraph 134 of the NPPF. The NPPF directs that any such harm **'should be weighed against the public benefits of the proposal'**. We have established throughout this Statement that the proposals would bring many benefits, and that they are considered necessary by the emerging Local Plan. As such, they accord with the requirements of national planning policy, and should be approved.

Agricultural Land

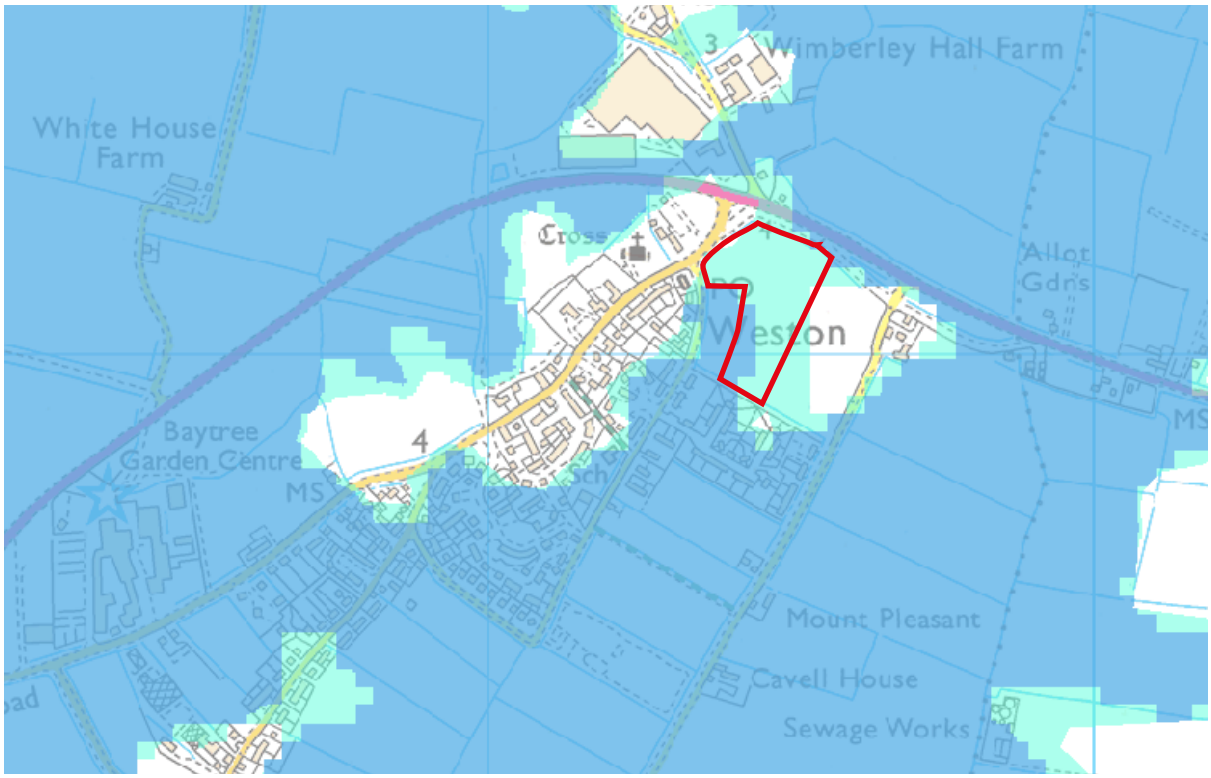
5.32 The application site is classified as Grade 1 agricultural land. However, this is also the case for the other land surrounding Weston, including all of the sites considered by the SHLAA. In addition, much of the land surrounding the other settlements in the District is high quality agricultural land. It is therefore inevitable that an element of this agricultural land must be lost in order to meet the need for housing. National policy accepts (NPPF, paragraph 112) that development may be necessary on agricultural land, and this is not seen as a reason for restricting development where no alternative options exist.

The Presumption in Favour of Sustainable Development

5.33 The presumption in favour of sustainable development applies to proposals for residential development, as directed by paragraph 49 of the NPPF. Paragraph 14 states that where local policies are out of date, planning permission should be granted 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.'

5.34 There are no such policies which indicate that this development should be restricted. As such, development should be permitted unless there are adverse impacts of such severity that they 'significantly and demonstrably outweigh the benefits'. We do not believe that there are any such adverse impacts and we believe that planning permission should therefore be granted without delay.



Extract from Environment Agency's Flood Map

Flood Zone 1

Flood Zone 2

Flood Zone 3

Flood Risk Sequential Test

6.1 The environment Agency's Flood Map indicates that the application site lies largely within Flood Zone 2, with small areas within Flood Zones 1 and 3a. The Council's Strategic Flood Risk Assessment (2010) (SFRA) indicates that the site is within Flood Zone 1, but we understand from discussions with the Council that this is soon to be replaced by a revised document, and in the meantime they advise the use of the Environment Agency's Flood Map rather than the SFRA.

6.2 In this context, it is necessary to apply the flood risk sequential test, as required by paragraph 100 of the NPPF. National policy and guidance allows for new residential development to be located within Flood Zones 2 and 3a, where the sequential test can be passed. Paragraph 101 of the NPPF explains this as follows:

'The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.'

6.3 It is therefore necessary to consider the alternative locations which might provide residential development, and whether they would be at a lower risk of flooding than the application site. Table 1[1] of the National Planning Practice Guidance (NPPG) defines the Flood Zones as follows overleaf.

6.4 When defining the area within which new sites will be considered, it is important to note the approach to development which the emerging Local Plan has adopted. This seeks to meet the need for housing across the District, within individual settlements, where they are sustainable locations. Weston has been identified as a sustainable location for development, and a housing target of 230 dwellings is proposed for this village alone. It is therefore logical to consider the sequential test in relation to the provision of housing in Weston.

1. National Planning Practice Guidance, Reference ID: 7-065-20140306.

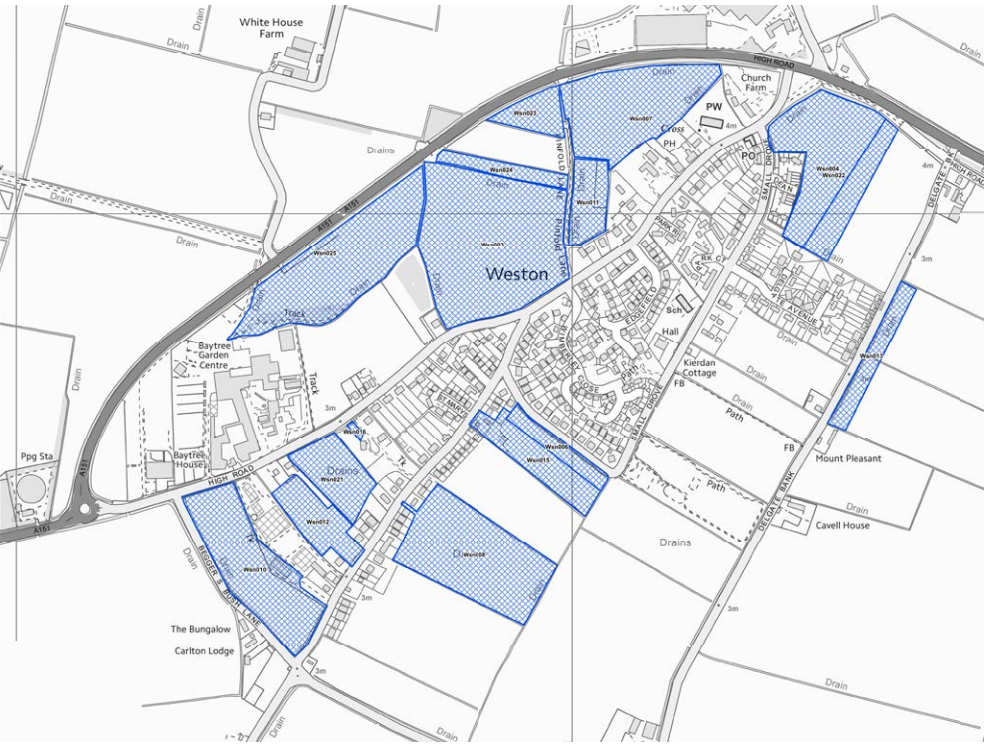
Flood Zone	Definition
Zone 1 Low Probability	Land having a less than 1 in 1,000 annual probability of river or sea flooding.
Zone 2 Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or Land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding.
Zone 3a High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding.
Zone 3b Functional Floodplain	This zone comprises land where water has to flow or be stored in times of flood.

6.5 This approach, of seeking to meet housing need locally within a single settlement, is one which has previously been accepted by South Holland Council on other applications, and we understand that it is an approach that they favour. It is also consistent with the spatial strategy in the emerging Local Plan, the stated aim of which is:

'To base the spatial strategy on a balance of factors relating to sustainable development, meeting development needs proportionate to the settlement's character and level of flood risk and providing guidance on meeting sustainable development outside the named settlements.'[2]

6.6 The Council's preferred spatial strategy is therefore to distribute new development around the District, with regard to a variety of factors influencing sustainable development, of which flood risk is only one. We have referred to other relevant factors above, and these include the availability of public transport and local services and facilities.

2. Emerging South-East Lincolnshire Local Plan 2011-2036, Draft for Public Consultation (January 2016), paragraph 3.2.1.



Extract from the Council's SHLAA (January 2016)

Consideration of Alternative Sites

6.7 Within Weston, the availability of alternative locations for development is considered within the Council's Strategic Housing Land Availability Assessment (SHLAA). This identifies a number of potential locations for residential development around the village, as shown on the adjacent map, which is taken from the published SHLAA (January 2016).

6.8 The SHLAA confirms that the application site (WSn004 and WSn022) is within Flood Zone 2 (medium risk), whilst Site WSn003 is within Flood Zone 1 (low risk). However, all of the other sites identified fall within Flood Zone 3a (high risk). We have explained in Section 4 that the Council have indicated a preferred approach to the allocation of sites in Weston, which would see the majority of the housing requirement met by Site WSn003 and the application site. This would clearly locate the majority of new development within Flood Zones 1 and 2, and so with regard to the availability of land, would clearly accord with the requirements of the sequential test.

Further Considerations

6.9 In addition, national policy and guidance regarding flood risk and new development requires that the development should meet the following tests:

1. It must be necessary;

2. It must be safe;

3. It must not increase the risk of flooding elsewhere.

6.4 We have demonstrated throughout this statement that the proposed development is necessary, in order to meet the identified need for housing, which we believe is a minimum. It is particularly necessary because of the range of social and economic benefits that it would bring.

6.5 The Flood Risk Assessment (FRA) which accompanies this planning application demonstrates that the proposed development would be safe from flooding. It is protected by existing defences, and the FRA concludes that the likelihood of these defences failing is very low. In addition, as a precautionary measure, the FRA recommends that the ground floor levels of all new dwellings should be raised to 3.2m AOD, and at least 150mm above the proposed internal roads, which would reduce the risk of flooding of any home to below a 1 in 200 year event.

6.6 The Drainage Strategy which accompanies this application demonstrates that the proposed development would not increase the risk of flooding elsewhere. Surface water would either be allowed to infiltrate the ground, or would be stored in a pond, and discharged to the adjacent IDB drain at a controlled rate which would replicate greenfield runoff, in accordance with the drainage authority's requirements. There would therefore be no increase in surface water runoff from the site, when compared to the current situation.

Conclusions

7.1 This application proposes 60 new dwellings, in a range of sizes from 1 to 4 bedrooms, and with affordable and market homes, and both houses and bungalows. This diverse range of housing would help to meet the needs of many local people, including those who are unable to afford to buy housing on the open market, and those seeking specialist accommodation for the elderly or wheelchair users.

7.2 The Council have identified a substantial shortfall in the provision of housing across South Holland District, of 1,487 dwellings. The identified supply is calculated by the Council at 3 years, only half of the required supply of 5 years plus 20%. This is a material consideration which weighs strongly in favour of the proposed development. We believe that his represents a best case scenario, and the actual level of the shortfall in the supply of housing may in fact be far greater.

7.3 In this context, national policy indicates that development plan policies for the supply of housing should be considered out of date. As such, Local Plan policies that would normally seek to prevent development from occurring outside the defined limits of settlements cannot be given any substantial weight in decision making. In contrast, the need for housing carries significant weight.

7.4 The proposed residential development of this site is also identified in the Weston Housing Paper, a document which supports the emerging Local Plan, as one of the Councils' two preferred sites for residential development in Weston. The flood risk sequential test implies that these sites represent the most suitable locations for residential development in the village, to meet the level of housing which the Local Plan indicates is required. It therefore appears inevitable that the application site will be developed, in the context of the new Local Plan.

7.5 National policy also indicates that this planning application should be considered in the context of the presumption in favour of sustainable development. This implies that development proposals should be granted planning permission, provided there would be no adverse consequences which would significantly and demonstrably outweigh the benefits of the proposed development. We have demonstrated throughout this statement that there are no such adverse consequences. We therefore respectfully request that planning permission should be granted for the proposed development without delay, in accordance with the presumption in favour of sustainable development.

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