SOUTH EAST LINCOLNSHIRE LOCAL PLAN: HOUSING PAPER – LONG SUTTON (JUNE 2016)

1 LONG SUTTON'S PLACE IN THE SPATIAL STRATEGY

- 1.1 Policy 2 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016) identified Long Sutton as a 'Main Service Centre'.
- 1.2 <u>Comments received</u> The following comments were received in support of Long Sutton's place in the Spatial Strategy:
 - 1. support Long Sutton's place in the hierarchy.
- 1.3 Given the lack of challenge made to Long Sutton's place in the Spatial Strategy, it is considered that it should remain as a 'Main Service Centre'.

2 LONG SUTTON'S HOUSING REQUIREMENTS

- 2.1 Policy 12 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016) identified that housing allocations should be made in Long Sutton to provide for 580 dwellings between April 2011 and 31st March 2036.
- 2.2 <u>Comments received</u> The following comments were received concerning Long Sutton's housing requirements:
 - 1. development should be provided in relatively small plots to organically blend in with the town, rather than large isolated estates which create their own character instead of gently integrating;
 - 2. the national requirement for increased housing (private and affordable) is acknowledged. But South East Lincolnshire should not be compared with the South-East where there is a pressing need for new housing. There is no shortage of private housing in the area, evidenced by the lack of demand for Anfield Road and the Butterfly Park development seems to have stalled. The housing need is based on the projected increased demand for employment within the area; there is unlikely to be an influx of new businesses and extra jobs in the Long Sutton area other than the organic growth of existing businesses. Princes is the major local employer and its future is questioned. New housing should take place close to employment growth in Spalding & Peterborough;
 - 3. question whether Long Sutton needs more housing when younger people move away to work (London, Peterborough, Kings Lynn etc.);

- new development will see an increase in traffic and congestion and increase the risk of accidents particularly on the A17 and its tributaries.
 These proposals will have a negative impact on pedestrians and cyclists.
 The A17 should be upgraded as it is struggling to cope with traffic now;
- 5. most of the land proposed is arable, reducing the land available to grow food and reducing jobs. Development, particularly affordable housing should take place on brownfield sites first;
- 6. the town does not need 580 units (23.2 per year) as there have only been 46 units built and sold in the last 4 years. There is no requirement for more than that per year, builders struggle to sell and that market is drying up because it is not as buoyant as Kings Lynn and Spalding. If these properties are built it will become a commuter town. The maximum required is 290; planning permission exists for half that;
- 7. there is no need for 580 houses to be built to accommodate 'local' people there is little problem with 'lack of housing for 30 somethings living at home with parents'. Local estate agents have 23 under £120k houses for sale and affordable housing was built in Lime Walk last year only 3 local people have moved in;
- 8. only one site was allocated in the current Local Plan for residential development in Long Sutton. This has curtailed population growth over the last 10 years or so. The draft Local Plan anticipates a population growth of 17.58% during the plan period, within a Main Service Centre with a Sustainability score of 171. The Sustainability of Long Sutton is undervalued (when compared to Minor Service Centres) it would be appropriate to increase the proposed 580 dwellings to 750 (an increase of 22.72%) commensurate with its status as the fourth largest settlement in the area, similar to Kirton which has a similar Sustainability score;
- Long Sutton is a historic Georgian Town; large developments and ECO developments are not compatible with its historic character and environs - any developments should be small and in keeping with the identity of a Market Town;
- the amount of development proposed is contrary to flood risk evidence which suggests that new development should not take place in Long Sutton;
- 11. properties should not be built higher than ground level; if authorities clean rivers, drains and dykes the system built by the Dutch will work;
- 12. the Local Plan could create a housing surplus when existing houses enter the market. Developers do not want to build new houses when existing properties are a better design and construction;

- 13. there is no evidence that the impact of development on infrastructure, has been taken into account because the local infrastructure (schools, doctors, hospital, dentists, local roads, shops, bus services, and sewers) cannot accommodate the demand that will be generated. Even if a new health centre is built it is difficult to get doctors and pharmacists to live and work in the area;
- 14. an additional 580 dwellings could make another surgery &/or school viable;
- 15. there is a limited bus service to Kings Lynn or Spalding; neither route serves employment areas leaving an extra 1000 residents travelling to work via car which will impact the road network. It does not address how those without private transport and not on the main bus route (after 6pm) will access leisure facilities, shops and services, particularly young people;
- 16. the size and design of new homes is important: dense building is out of character and reduces the number of gardens. Small properties do not provide an appropriate quality of life for inhabitants, all properties should be built to BREEAM standards;
- 17. everyone needs a car, often 2 or perhaps a work van each property should have off road parking;
- 18. the housing requirement goes against the economy of scale regarding small developments and Flood Re (only applies to properties built in high flood risk areas before January 2009) meaning that any property built after that date will not be eligible for affordable insurance (so it may be difficult to a mortgage). One solution could be to build executive homes thus freeing up older existing stock for young local families;
- 19. land with planning permission should be developed before any new development is considered or permitted;
- 20. planning permission has been granted for the former Butterfly Park for housing. The Local Plan settlement boundary should be redrawn to include it as a commitment:
- 21. the balance of market and affordable housing on such a large scale will adversely impact on the socio-economic profile of the town. With limited economic growth planned for the immediate future, there is a risk that either the rate of affordable housing to market properties will be increased to satisfy an immediate requirement, or that market housing will remain unsold, creating a single, partially occupied, unappealing, out-of-character development in this town;

22. appropriate drainage schemes should be included in any planning permission and be available for public inspection. Need guarantees that if several contractors are involved they would still deliver a satisfactory outcome. Terms of Consent should be adhered to without modification.

2.3 Responses to the above comments:

- a mix of small and larger scale housing sites are required to ensure that a mix of house types and tenures can be delivered across the plan period. This will also cater for demand from national and local housebuilders and for self build. It should be possible through good design to ensure that new housing sites (small or large) can complement the character of Long Sutton and integrate with the existing built form;
- 2. the National Planning Policy Framework requires that each Local Plan area provides enough land to meet its housing needs in the short and long term. Job growth and/or economic forecasts, including the long term operation of existing employers, are only one factor that is taken into account when assessing housing need; the National Planning Practice Guidance identifies that local housing need should also be based on household and population projections (taking account of migration and demographic change), the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand. New housing is proposed in Spalding to meet the town's identified needs. The housing requirements for Peterborough and King's Lynn are provided for by their respective Local Plans;
- 3. the Peterborough Sub Regional Strategic Housing Market Assessment identifies that 10,750 new dwellings are required to meet South Holland's housing needs over the plan period. This has been apportioned between settlements in the hierarchy to meet each settlements housing needs, including those of younger people;
- 4. new development will inevitably generate additional vehicle movements; the Highways Authority have raised no objections to the overall housing requirement for Long Sutton in terms of highways safety and congestion and have recognised that all of the sites have the potential to be accessible on foot and bicycle. The County Council have confirmed that there are no plans at present to upgrade the A17;

- 5. most of the sites are classified as best and most versatile agricultural land, but this is equally true of all greenfield sites in and around South Holland. It is accepted that it is preferable to develop previously-developed sites, but such sites are not available in sufficient numbers to meet Long Sutton's private housing or affordable housing needs;
- 6. 96 homes were completed over the last five years (2011-2016) (19.2 per year). Planning permission exists for 160 dwellings, leaving a residual requirement of 324 dwellings. It is accepted that this represents a slight annual increase (29 per year) but the Council does not have a 5 year supply of housing sites this requirement can deliver housing in the short term to help address the under-delivery but also to provide sustainable locations for growth over the next 25 years when the economy and housebuilding rate is expected to improve;
- 7. the Local Plan covers the period to 2036. Sufficient land needs to be provided to ensure that the area's objectively assessed need is met in the short and long term, this includes affordable housing, homes for families, starter homes and homes for older people. In general the Local Plan cannot control who buys/rents properties;
- 8. the scale of housing growth proposed for Long Sutton took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; population and household projections and the local availability of land at lower risk of flooding. Kirton has a housing requirement figure of 500 and a Sustainability Score of 126; the housing requirement for Long Sutton of 580 dwellings with a Sustainability Score of 171 is therefore broadly comparable:
- 9. whilst it is true that Long Sutton is Georgian Market Town, with a historic core, there are nonetheless existing examples of larger development (Cowpers Gate, Dunlin Drive, and John Swains Way), that complement the built form of Long Sutton albeit with a more modern design. Consequently, it is not accepted that the development of larger sites in Long Sutton would conflict with the town's existing built form;
- 10. the Environment Agency identifies that 'allocations in areas of hazard would need to ensure that finished floor levels are raised to the appropriate level with additional flood resilient construction incorporated into proposals. Developers would need to confirm that they can achieve required mitigation and that the proposal would still be deliverable. Adopt a Flood Risk Mitigation Policy to ensure safe development.' Detailed guidance on finished floor levels is set out in paragraph 4.3;

- 11. a mix of housing types will be promoted to meet the identified housing need over the plan period. All dwellings will need to reflect the Environment Agency's Flood Mitigation Policy so could include one and two storey properties;
- 12. 580 new houses are required to meet an identified need over the plan period, existing properties being bought and sold will also be required to generate housing churn and support an active housing market to ensure that a range of products are available to meet identified needs;
- 13. the Local Plan will have to demonstrate how arising infrastructure needs will be met, and these matters will be dealt with in later versions of the document and the Infrastructure Delivery Plan that will accompany it;
- 14. the Local Plan will have to demonstrate how arising infrastructure needs will be met, and whether this justifies additional new facilities;
- 15. a bus service (every 20 minutes Monday-Saturday, every 30 minutes on a Sunday) operates between Spalding and King's Lynn, stopping in Long Sutton, in addition there is a CallConnect service. These services stop in the town centres and Springfields where employment and leisure opportunities may be. Whilst it is true that services do not operate after 7pm, residents are able to access a range of leisure facilities, shops and services in Long Sutton, but it is accepted that residents are more likely to use a car/van to travel to work or for leisure but this is true of residents in most settlements;
- 16. the density for each site has been derived from an assumed density of 20/hectare, and it is not accepted that development at such a density would be incompatible with local character. New development is no longer required to be built to Code for Sustainable Homes or BREEAM standards – these have been replaced by Building Regulation requirements;
- 17. the Local Plan will have to demonstrate how parking needs arising from new development will be addressed. These matters will be dealt with in later versions of the document;
- 18. although home insurance may be more onerous for residents living in a higher flood risk area, it is still possible to secure insurance from a range of providers. A range of homes will be promoted through the Local Plan to meet identified needs. This will include starter homes, homes for families or for residents wishing to downsize;

- 19. there is planning permission for 160 dwellings in Long Sutton. It is accepted that it is preferable to develop these sites first, but such sites are not coming forward at the rate required to meet Long Sutton's housing needs so additional sites will need to be identified;
- 20. it is accepted that the former Butterfly Park has planning permission for housing development. During the public consultation there was some concern expressed about this planning permission. Recent discussions with Members also revealed concerns about this proposal indicating that there was no desire to ensure development in this location if the planning permission for the present proposal were to lapse. The site has, therefore, been designated as lying outside the emerging settlement boundary for Long Sutton;
- 21. the National Planning Policy Framework requires that each Local Plan area provides enough land to meet its housing needs in the short and long term. Job growth and/or economic forecasts, including the long term operation of existing employers, are only one factor that is taken into account when assessing housing need; the National Planning Practice Guidance identifies that local housing need should also be based on household and population projections (taking account of migration and demographic change), the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand. Therefore it is not accepted that the level of housing proposed will create an imbalance between market and affordable properties;
- 22. all new development in Flood Zone 3a, or in areas of hazard or schemes of over 1ha (outside Flood Zone 3a) would be required to submit a Flood Risk Assessment with a planning application. Drainage schemes are also required for most other developments. These are available for public inspection during the consultation for each planning application. Approved plans apply to every developer involved in a scheme. In some cases it is necessary to seek a modification to a planning permission, these are generally consulted upon with the relevant consultees.

2.4 It is not considered that the comments made by consultees justify a change to Long Sutton's housing requirements. However, a slight reduction in the housing requirement is considered necessary based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5.Consequently, it is considered that a change to Long Sutton's housing requirements should be made, and that the Local Plan should provide for 560 dwellings between 1st April 2011 and 31st March 2036.

3 LONG SUTTON'S RESIDUAL REQUIREMENTS

- 3.1 **Completions** Between 1st April 2011 and 31st March 2016, 96 new dwellings were built in Long Sutton.
- 3.2 **Commitments** As at 31st March 2016, planning permission was outstanding for the construction of 160 dwellings in Long Sutton, and there is no evidence to suggest that these permissions will not be implemented during the Plan period.
- 3.3 **Residual requirement** Given the above figures, the identification of land to accommodate approximately 304 dwellings is required (560 96 160 = 304)

4 INFRASTRUCTURE

- 4.1 **Education** the County Education Department has commented that there is some capacity at the primary school, and there is capacity to expand, but there is a lack of local capacity at secondary level and, at secondary level, there may be limited capacity to expand.
- 4.2 **Health –** the CCG's have commented that currently there is some capacity at the local GP surgery(ies) to accommodate additional patients, however County wide there is an increasing shortage of GP's, nurses and other healthcare staff which could affect future capacity should demand increase.

- 4.3 Flood risk – the Environment Agency have commented that 'allocations in areas of hazard would need to ensure that finished floor levels are raised to the appropriate level with additional flood resilient construction incorporated into proposals. Developers would need to confirm that they can achieve required mitigation and that the proposal would still be deliverable. Adopt a Flood Risk Mitigation Policy to ensure safe development. Requirements for Finished Floor Levels (FFL): depths of >1.6m: it is unlikely that mitigation measures would prevent flood water from entering the building at ground floor level. Therefore proposals must be a minimum 2 storey with no ground floor habitable accommodation. The first floor living accommodation shall be above the highest predicted flood depth; depths of 1-1.6m: proposals must be a minimum 2 storey with FFL set at a minimum of 1m above ground level, flood resilient construction shall be used to a height of 300mm above the predicted flood level, demountable defences to 600mm above FFL; depths 0.5-1m: FFL to be set above ground level, flood resilient construction shall be used to a height of 300mm above the predicted flood level, (single storey proposals must consider the 0.1% +climate change event for setting FFL); depths of 0.25-0.5m; FFL to be set 500mm above ground level, flood resilient construction shall be used to a height 300mm above the predicted flood level; depths 0-0.25m: FFL to be set 300mm above ground level.
- 4.4 Anglian Water has commented that the capacity of the surface water network has major constraints, and that all developments should seek to reduce flood risk and incorporate Sustainable Drainage Systems (SuDS).
- 4.5 **Sewage Treatment** The Environment Agency has commented that Sutton Bridge Water Recycling Centre (Sewage Treatment Works) has capacity for 3780 dwellings. Anglian Water has commented that the Water Recycling Centre has capacity to serve all the sites. The foul sewerage network would require upgrading for Los006, Los008, Los009, Los015, Los020, Los023, Los026, Lut011 and Ged001.
- 4.6 **Water Supply** Anglian Water has commented that water resources are adequate to serve the proposed growth. However the supply network would require upgrading to accommodate nine of the sixteen sites.

5 LONG SUTTON SITE OPTIONS

5.1 Inset Map 7 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016) identified 16 'Potential Housing Sites', Ged001, Ged014, Lut011, Los006, Los008, Los009, Los012, Los014, Los015, Los019, Los020, Los022, Los023, Los026, Los028 and Los030.

5.2 <u>Comments received</u> - The following comments were made on site *Ged001* (Land to the north of Gedney Road, Long Sutton):

- 1. it can be considered as a stand-alone site or in conjunction with adjoining sites:
- 2. it has a long frontage to Gedney Road and all services are available: street lighting, pavement, cycle path, bus stop;

- 3. this site will make it a very busy area and Dockings Holt is difficult enough without additional traffic;
- 4. the site is home to a variety of local fauna which will be lost if these properties are developed;
- 5. generally favour development in a north western direction.

5.3 Responses to the above comments:

- 1. confirmation of the site's availability, as a stand-alone site or as a larger site is welcome:
- 2. the availability of street lighting and pavement along the Gedney Road frontage is noted, the SHLAA identifies that 'there are two bus stops close to the site' but there is no cycle path;
- 3. the Highways Authority identifies that 'Docking's Holt is not suitable to serve this site', and although the site would generate additional traffic, this is true of all other housing sites in South Holland;
- 4. the SHLAA identifies that the site 'will not have adverse impacts on natural, built or historic assets' however should this site be taken forward, a Phase 1 Habitat Survey may be required to identify the presence/absence of biodiversity interests on the site, to address any adverse impacts relating to the site's proximity to The Shrubberies Local Wildlife Site and to identify whether further surveys will be required, such as for protected species;
- 5. Site Ged001 is within the north-western part of Long Sutton.
- 5.4 <u>Conclusions on site Ged001</u> It is considered that site Ged001 is not one of the most suitable Potential Housing Sites in Long Sutton, and that it should not be taken forward as a Preferred Housing Site:
 - the Sustainability Appraisal scores site Ged001 with three/13
 positive (green) impacts being recorded relating to housing delivery,
 accessibility and access to employment;
 - the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '1-2m' not the least sequentially preferable site but with more risk than other sites in Long Sutton;

• the Highways Authority identifies that 'safe access with good visibility can be formed over Gedney Road avoiding the Fleet River. Provision should be made into Ged014 and possibly over Docking's Holt into Lut011. Docking's Holt is not suitable to serve this site or Lut011.'It would appear that a satisfactory access can be achieved, but this is less straightforward than for some other sites.

5.5 <u>Comments received</u> - The following comments were made on site **Ged014** (Land to the north of Gedney Road, Long Sutton):

- 1. this site will make it a very busy area, such proposals will only add to the congestion as well as the noise;
- 2. the site is home to a variety of local fauna which will be lost if these properties are developed;
- 3. large housing developments bring crime and compromise privacy;
- 4. the owners have indicated that the site is no longer available;
- 5. generally favour development in a north western direction.

5.6 Responses to the above comments:

- the site would generate additional traffic, but this is also true of all other housing sites in South Holland. The Highways Authority have not identified any particular congestion concerns relating to this site in terms of traffic or noise;
- 2. the SHLAA identifies that the site 'will not have adverse impacts on natural, built or historic assets' however should this site be taken forward, a Phase 1 Habitat Survey may be required to identify the presence/absence of biodiversity interests on the site, to address any adverse impacts relating to the site's proximity to The Shrubberies Local Wildlife Site and to identify whether further surveys will be required, such as for protected species;
- the design of new development will have to ensure that the amenity of existing and future residents is acceptable, and that crime and the fear of crime is minimised. It is therefore not accepted that large scale developments generate crime or compromise privacy;
- 4. confirmation that the site is no longer available is noted;
- 5. Site Ged014 is within the north-western part of Long Sutton.
- 5.7 <u>Conclusions on site Ged014</u> It is considered that site Ged014 is not one of the most suitable Potential Housing Sites in Long Sutton, and that it should not be taken forward as a Preferred Housing Site:

- the Sustainability Appraisal scores site Ged001 with three/13
 positive (green) impacts being recorded relating to housing delivery,
 accessibility and access to employment;
- the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '1-2m' one of the least sequentially preferable sites in Long Sutton;
- the Highways Authority identifies that 'it may be possible to provide a safe access onto Gedney Road but because it is close to a bend visibility may be compromised. Therefore it would be preferable if the site was accessed via Ged001.' But as Ged001 is not being taken forward as a Preferred Housing Site, it would appear that a straightforward satisfactory access cannot be achieved in this plan period;
- the site is no longer available as a potential housing site so can no longer be considered for housing development in the Local Plan.

5.8 <u>Comments received</u> - The following comments were made on site *Lut011* (*Land to the west of Lime Walk, Long Sutton*):

- 1. generally favour development in a north western direction;
- 2. the site is home to a variety of local fauna which will be lost if these properties are developed. More trees will need to be removed for this new development;
- 3. the main access for Long Sutton are Gedney Road and the B1359; potential housing areas off these roads make sense and would be more suitable for the current road infrastructure;
- 4. Gedney Road is heavily used particularly at peak times on weekdays; Dockings Holt is narrow, sub-standard, single track; the junction with Gedney Road is dangerous with bad visibility; Lime Walk/ Dockings Holt is unsuitable for the volume of vehicles particularly as the Anfield Road development doubles the traffic; the Anfield Road entrance would be opposite the proposed entry road of the new development creating a crossroads on a busy road; the proposed entry is not wide enough to accommodate two way traffic and will add to congestion, noise and air pollution;
- 5. would lose field view from property which would devalue our investment;

- 6. existing 1930's homes are built on brick pillars 2-3ft from the ground, suggesting that flooding might have been a problem for many years. With the ER out routes now in place it is hard to understand building on land that is prone to flooding;
- 7. the site floods water runs into gardens new development will have soak away rain water drainage and will compound this issue. This will raise household insurance but devalue or make our home unsaleable:
- 8. Lut011 is within a flood risk area so new housing will need to be raised. This could mean houses towering over the existing properties especially bungalows. This has happened at the back of Anfield Road;
- 9. The impact upon schools, sewage, water supply, carbon footprint, police, fire, ambulance, recreation facilities and the local surgery will be uplifted to the point that it will cause distress. The amount of profit in housing should be offset by the purchaser and builders to help to fund these priorities for the local community;
- 10. concerned about the negative impacts that large housing can bring namely crime and a compromise on privacy.

5.9 Responses to the above comments:

- 1. Site Lut011 is within the north-western part of Long Sutton;
- 2. the SHLAA identifies that the site 'will not have adverse impacts on natural, built or historic assets' however should the site be taken forward, a Phase 1 Habitat Survey may be required to identify the presence/absence of biodiversity interests on the site, to address any adverse impacts associated with the site's proximity to The Shrubberies Local Wildlife Site and to identify whether further surveys will be required, such as for protected species. It appears that there are no trees on site, although care would be taken to ensure that there are no adverse impacts upon trees in neighbouring gardens;
- 3. the site could potentially access onto Gedney Road;
- 4. the Highways Authority identifies that 'vehicular access could be difficult. The access onto Lime Walk is directly opposite Anfield Road and would form a crossroads with it. It would be preferable if access could be formed to Gedney Road or from Ged001.' However the Highways Authority has not indicated that there are any existing adverse impacts from congestion, noise or air pollution in the locality that would be exacerbated through new development. It would appear that a satisfactory access could be achieved, although this might not be as straightforward as for other sites;

- 5. it is inevitable that the development of this site would change the outlook of existing nearby dwellings, but this is equally true of all alternative sites. At the time of a planning application, the layout and design of a scheme would be carefully scrutinised to minimise overlooking and privacy loss. Property prices are not a planning matter;
- 6. the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '1-2.0m' one of the least sequentially preferable sites in Long Sutton;
- 7. Anglian Water identifies that 'all developments should seek to reduce flood risk and incorporate Sustainable Drainage Systems (SuDS)'. It would appear that impact of surface water run-off could be managed satisfactorily so that insurance and mortgages can be achieved. However, such issues are not unique to site Lut011 – they apply equally to all alternative sites elsewhere in Long Sutton, and to other locations throughout the Plan area;
- 8. The Environment Agency identifies that 'for depths of >1.6m proposals must be a minimum of 2 storey with no ground floor habitable accommodation. The first floor living accommodation shall be above the highest predicted flood depth.' The neighbouring properties are a mix of houses and bungalows. It is not accepted that properties would tower over existing houses although care would need to be taken through the design of the site to ensure that the amenity of residents is maintained;
- 9. the Local Plan will have to demonstrate how arising infrastructure needs, including for health, will be met through the Infrastructure Delivery Plan. Where appropriate planning conditions and/or developer contributions may be used to help provide for the infrastructure needed to mitigate the impact of a new development on the community;
- 10. the design of new development will have to ensure that the amenity of existing and future residents is acceptable, and that crime and the fear of crime is minimised. It is therefore not accepted that large scale developments generate crime.
- 5.10 Conclusions on site Lut011 It is considered that site Lut011 is not one of the more suitable Potential Housing Sites in Long Sutton, and that it should not be taken forward as a Preferred Housing Site:
 - the Sustainability Appraisal scores site Lut011 with two/13 positive (green) impacts recorded, relating to housing delivery and access to employment but five negative (orange) impacts relating to accessibility, education, green infrastructure, soil, air and water quality and flood risk;

- the SHLAA identifies that 'the land is Grade 1 agricultural land with open boundaries to the north and partly to the west', the potential impact upon the landscape is an issue that does not affect other sites to the same extent;
- the SHLAA identifies that 'the site is suitable if it is allocated together
 with Ged001 and Ged014 and an access from Gedney Road serves
 Ged001 and Ged014 before crossing the drain and highway into this
 site', it appears that if Ged001 and Ged014 are not allocated are a
 suitable access solution could not be achieved in this plan period;
- the SHLAA identifies that 'Fleet River is deep drain and South Holland IDB are unlikely to allow it to be piped and it would be expensive and undermine viability'. This is an issue which does not affect other sites in Long Sutton to the same extent.

5.11 <u>Comments received</u> - The following comments were made on site *Los008* (*Land to the east of Lime Walk, Long Sutton*):

- Los008 is adjacent to a recently built housing development additional housing in this area makes sense - houses there would not suffer from road traffic noise off the busy A17;
- 2. the Anfield Road development has attracted some anti-social behaviour new development should not increase this;
- 3. Lime Walk has always been a lovely open area famous for Lime trees these should be protected;
- 4. Fall Drain and the landscape area should be widened to create a natural buffer strip to include grassy areas and willow spinneys to aid drainage. This would enhance the quality of the environment and may make the site more acceptable. Guarantees would be required that it would not be altered after Consent given;
- 5. traffic down Lime Walk has already doubled due to the development of 40 houses on the Anfield Road site;

5.12 Responses to the above comments:

 Los008 is adjacent to Los026 which adjoins the recently completed Anfield Road development, so the site relates well to the existing built form of Long Sutton particularly if developed in association with the adjoining Los026. The site is located to the north of Long Sutton so is some distance from the A17;

- 2. the design of new development will have to ensure that crime, the fear of crime and anti-social behaviour is minimised:
- 3. trees exist along the western boundary of Los008 and in the adjoining gardens none are protected good design should ensure that any adverse impacts are minimised by careful layout or replacements planted through the development. Care would be taken to ensure that there are no adverse impacts upon trees in neighbouring gardens:
- 4. Fall Drain is an existing feature; an appropriate stand-off distance would be required from the Drain, and where practicable landscaping and biodiversity features would be encouraged to enhance the environmental quality of this feature. This would be addressed through the design of the development through the planning application process. Approved plans can be revised in exceptional circumstances with consent from the Local Planning Authority;
- 5. the Highways Authority identifies that 'access from Lime Walk could be achieved but the existing frontage footway and surface water drainage would need to be extended to the site. Ideally there should be a vehicular connection to Los026 and Anfield Road/Magpie Close.' It appears a satisfactory and straightforward access and transport solution can be achieved. The Highways Authority has not indicated that there are any existing adverse impacts from congestion, noise or air pollution in the locality that would be exacerbated through new development.
- 5.13 Conclusions on site Los008 It is considered that site Los008 is one of the more suitable Potential Housing Sites in Long Sutton, and that it should be taken forward as a Preferred Housing Site:
 - the Sustainability Appraisal scores site Los008 as having two
 positive (green) impacts being recorded relating to housing delivery
 and access to employment although a further six (blue) impacts
 could deliver positive impacts by securing meaningful infrastructure
 to meet the needs of future residents such as open space and
 school places;
 - the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m' not the most sequentially preferable site but with less risk than some other sites in Long Sutton;

- the SHLAA indicates that 'opening up costs are likely to be low
 (although flood mitigation costs are likely), if it is allocated there is a
 reasonable prospect that it would be developed (assumed to begin in
 year 8, and be completed before year 15) [the plan is currently in
 year 6], so this site is considered to be deliverable, therefore able to
 contribute to the Council's five year supply of available housing sites;
- although the site attracted objections, none of the issues raised appear to be insoluble, or are particular to this site.

5.14 <u>Comments received</u> - The following comments were made on site *Los026* (*Land to the east of Lime Walk, Long Sutton*).

- Los026 is adjacent to a recently built housing development additional housing in this area makes sense - houses there would not suffer from road traffic noise off the busy A17;
- 2. the Anfield Road development has attracted some anti-social behaviour new development should not increase this;
- 3. Lime Walk has always been a lovely open area with Lime trees these should be protected;
- 4. traffic along Lime Walk has already doubled due to the development of 40 houses on Anfield Road:
- 5. the owner confirms the site is available, with developer interest and a vehicular access from Anfield Road and services to the common boundary.

5.15 Responses to the above comments:

- Los026 is adjacent to the recently completed Anfield Road development and the settlement boundary of Long Sutton, so the site relates well to the existing built form of Long Sutton. The site is located to the north of Long Sutton so is some distance from the A17;
- 2. the design of new development will have to ensure that crime, the fear of crime and anti-social behaviour is minimised;
- trees exist along the western boundary of Los026 and in the adjoining gardens – none are protected – good design should ensure that any adverse impacts are minimised by careful layout or replacements planted through the development. Care would be taken to ensure that there are no adverse impacts upon trees in neighbouring gardens;

- 4. the Highways Authority identifies that 'this site could be developed off Lime Walk provided the frontage footway, drainage and street lighting are extended. Secondary access off Magpie Close and connection to Los008 would be desirable.' It appears a satisfactory and straightforward access and transport solution can be achieved. The Highways Authority has not indicated that there are any existing adverse impacts from congestion, noise or air pollution in the locality that would be exacerbated through new development;
- 5. confirmation of the site's availability is welcome, developer interest and details relating to vehicular access and services are noted.
- 5.16 Conclusions on site Los026 It is considered that site Los026 is one of the more suitable Potential Housing Sites in Long Sutton, and that it should be taken forward as a Preferred Housing Site:
 - the Sustainability Appraisal scores site Los026 with 2 positive (green) impacts being recorded relating to housing delivery and access to employment opportunities although a further seven (blue) impacts could deliver positive impacts by contributing towards infrastructure to meet the needs of future residents such as open space and school places;
 - the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m', one of the most sequentially preferable sites in Long Sutton;
 - the site is adjacent to the Long Sutton settlement boundary so would form a natural extension to the built area without having an adverse impact upon the character of the area;
 - the SHLAA indicates that 'opening up costs are likely to be low (although flood mitigation costs are likely), if it is allocated there is a reasonable prospect that it would be developed (assumed to begin in year 8, and be completed before year 15) [the plan is currently in year 6], so this site is considered to be deliverable, therefore able to contribute to the Council's five year supply of available housing sites;
 - although the site attracted objections, none of the issues raised appear to be insoluble, or are particular to this site.

5.17 <u>Comments received</u> - The following comments were made on site *Los022* (*Land to the east of Roman Bank, Long Sutton*):

 the western part of the site should include 74 Roman Bank and not 76 Roman Bank. The small strip of land to the south of Los022 should also be included:

- Los022 appears to be land to the rear of 74 and 76 Roman Bank the house and land at 74 Roman Bank was sold in 1976 and the sale agreement stipulated that no housing should be built to the rear of the properties whilst current owners live at 76 Roman Bank;
- the landowner confirms that this clause is correct but the deed is restrictive only to the current owner and did not include a 'Successors in Title' clause. This should not be a restriction following transfer of title to a developer.

5.18 Responses to the above comments:

- 1. the housing site boundary will be amended to include 74 Roman Bank and the strip of land to the south of the existing Los022. 76 Roman Bank will be deleted:
- 2. details of the legal clause are noted;
- 3. confirmation of the details of the legal agreement is welcome.
- 5.19 Conclusions on site Los022 It is considered that site Los022 is not one of the more suitable Potential Housing Sites in Long Sutton, and that it should not be taken forward as a Preferred Housing Site:
 - the Sustainability Appraisal scores site Los022 with four positive (green) impacts being recorded relating to housing delivery, inclusive communities, landscape character and access to employment;
 - the Highways Authority identifies that 'it is presumed that it is
 intended to demolish an existing property otherwise there is not a
 suitable access. However the principle of development may be
 acceptable subject to the design of a suitable junction'. It would
 appear that a satisfactory access solution can be achieved, although
 this is not as straightforward as for some other sites;
 - although the owners indicate that the legal issues are straightforward to resolve, this may prove to be a lengthy process;
 - although none of the issues identified are insoluble, they may not be straightforward to resolve and are particular to this site.

5.20 <u>Comments received</u> - The following comments were made on site *Los023* (*Land to the north of London Road, Long Sutton*):

- 1. this land should remain for use as individual plots in the future or for another use by the church;
- 2. the two possible access points are on difficult curved sections of road access onto Roman Bank would have poor visibility;

- 3. Los023 adjoins Long Sutton Conservation Area to the north. Further assessment is required to determine the impact on the significance of these heritage assets;
- 4. the owners have confirmed that the site is no longer available.

5.21 Responses to the above comments:

- 1. the availability of the land for alternative uses will be determined by the landowner;
- 2. the Highways Authority identifies that 'access onto London Road is restricted and compromised. A footway/cycleway would be beneficial. Access onto Roman Bank could be achieved but is 2 or 3 metres higher than the site, on the inside of a bend and would require large visibility splays. It would be helpful if the existing narrow footway could be widened.' It appears a satisfactory access could be achieved but it would be less straightforward than for other sites;
- 3. Los023 adjoins Long Sutton Conservation Area and, with careful layout, design and choice of materials it is considered that impacts are likely to be acceptable;
- 4. confirmation that the site is no longer available is noted.
- 5.22 Conclusions on site Los023 It is considered that site Los023 is not one of the more suitable Potential Housing Sites in Long Sutton, and that it should not be taken forward as a Preferred Housing Site:
 - the Sustainability Appraisal scores site Los023 well, with four positive (green) impacts being recorded relating to housing delivery, accessibility, inclusive communities and access to employment;
 - although an access solution could be achieved it could be less straightforward than for other sites;
 - the site is no longer available as a potential housing site so can no longer be considered for housing development in the Local Plan.

- 5.23 <u>Comments received</u> The following comments were made on sites **Los012** (Land to the west of Wisbech Road, Long Sutton), Los015 (Land to the east of Seagate Road, Long Sutton) and Los030 (Land to the east of Seagate Road, Long Sutton:
 - 1. the site is within a designated flood plain;

- the site is close to the lowest point in Long Sutton and is boarded by two shallow ditches which are inadequate to take surface water from a major development. Housing development of this size would introduce significant impermeable areas which will collect surface water rather than disperse it; sustainable drainage should be used to minimise any run off on to nearby development;
- the main access routes for Long Sutton are Gedney Road and the B1359
 the potential housing areas identified off these roads make sense and would be more suitable for the current road infrastructure;
- 4. Seagate Road is heavily used by traffic accessing Lancaster Drive, Colsuan Gardens and Warwicks Cement Works; Seagate Road has no footpath, the road is only 16ft wide, narrowing to 14ft on a blind bend, which experiences 'near misses' particularly as HGVs regularly use it. It should be a 30 mph limit with a 7.5 ton limit. Another junction would compromise safety and further erode road quality;
- 5. the loss of grade 1 arable land is unnecessary and should be used for food production and not housing when brownfield sites available;
- 6. the development of these sites would have a negative impact upon the doctors (which is full) and schools, there are no NHS dental facilities, police or Traffic Wardens locally and inappropriate parking is rife. Thought needs to be given to a community centre, larger chemist and another supermarket should this development take place;
- 7. question the purpose of building a by-pass to infill it with housing; road noise is debilitating to live with;
- 8. Wisbech Road is used by a lot of traffic including HGVs accessing Princes and Bridge Road Industrial Estate from the A17. The brow of the bridge is narrow; turning lorries from Bridge Road have to use both sides of the road suggesting visibility is poor. A new junction close to the bridge would be dangerous there is only room for pedestrians to walk single file across the bridge. It would need a significant upgrade to carry the traffic that a new development would attract but cannot be widened without encroaching on the footpath or gardens;
- 9. the main sewage drain runs along Seagate Road and are below that of the site which could increase the flood risk to existing properties and beyond Seagate Road itself. Wisbech Road has major problems with drainage, sewage and odour. The pipes along the edge of the site back up - Anglian Water have to clear sewage three to four times a year, suggesting that further development would exacerbate existing problems;

- the new housing development needs to be sympathetic to existing homes and green areas, and should not lead to overlooking/loss of privacy or loss of light;
- 11. if this development were to go ahead there would be no green/recreational areas in the south of Long Sutton;
- 12. residents would suffer from construction noise and mess (i.e. mud on roads making it slippery and dangerous);
- 13. the owners confirm the availability of sites Los030, Los015 & Los012 in the short term a planning proposal will be submitted shortly;
- 14. overhead power and telephone lines exist along Seagate Road which would have to relocated;
- 15. there are two sewage inspection chambers in Los015 to facilitate the houses that back onto the field these overflow;
- 16. the site is home to Monkjack deer, barn owls, foxes, newts and frogs development would have a detrimental impact on wildlife;
- 17. a footpath runs along the boundary from Seagate Road to Wisbech Road. Any proposed development of the site would need to protect it.

5.24 Responses to the above comments:

- the majority of the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.25-0.5m', but site Los030 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1m', not the most sequentially preferable sites but with less risk than most other sites in Long Sutton;
- the development of this size site would require a surface water/sustainable drainage strategy to ensure that surface water run off can be dealt with appropriately. Such issues will be dealt with in more detail in later versions of the Plan, and the Infrastructure Delivery Plan that will accompany it, as well as through the planning application process;
- 3. the site could access onto Wisbech Road (B1359);
- 4. the Highways Authority have not indicated that the current traffic flows and road safety on Seagate Road would be adversely impacted by the development of this site. Should this site be taken forward, weight restrictions along Seagate Road could be considered through the planning application process;

- 5. the site is classified as best and most versatile agricultural land, but this is equally true of all greenfield sites in and around Long Sutton. It is accepted that it is preferable to develop previously-developed sites, but such sites are not available in sufficient numbers to meet Long Sutton's housing needs;
- 6. the Local Plan will have to demonstrate how arising infrastructure needs will be met, and these matters will be dealt with in later versions of the document and the Infrastructure Delivery Plan that will accompany it;
- 7. these sites would provide a natural extension to Long Sutton by extending the boundary of Long Sutton south, but there would still be a significant separation of approximately 350m between the settlement boundary and the A17. This should be sufficient to minimise noise associated with the A17 but adverse impacts can be reduced by site layout, house design, bunding/screening and acoustic vents to bedrooms facing the road;
- 8. the Highways Authority identifies that 'the carriageway and footway on Wisbech Road are adequate to serve residential development on this site. The frontage appears wide enough to accommodate the required junction and has sufficient visibility. Provision should be made to Los015'. It appears that a satisfactory, straightforward access solution can be achieved to this site:
- 9. Anglian Water identifies that the foul sewerage network is able to accommodate sites Los012 and Los030, but would require upgrading to accommodate site Los015. Therefore enhancements to the foul sewerage network are likely to be required. Such issues will be dealt with in more detail in later versions of the Plan, and the Infrastructure Delivery Plan that will accompany it;
- 10. it is inevitable that the development of this site would change the outlook of existing nearby dwellings, but this is equally true of all alternative sites. At the time of a planning application, the layout and design of a scheme would be carefully scrutinised to minimise overlooking and privacy loss;
- 11. any new development of 10 or more dwellings would be expected to provide for recreational open space/play areas to meet the needs of its residents; given the size of this development it is expected that this would be provided on site, which would provide additional open space in this part of Long Sutton;
- 12. planning conditions are used to ensure that no harm would be caused during construction to neighbouring dwellings, but these issues would apply equally to all alternative sites;

- 13. confirmation of the sites' availability are welcome;
- 14. it is accepted that overhead power lines and telephone cables may need to be re-routed to accommodate new development;
- 15. the ongoing operation, access and maintenance of any sewerage infrastructure would need to be maintained. The design of new development would need to ensure that residential amenity is not affected by proximity to such infrastructure;
- 16. the SHLAA identifies that the site 'will not have adverse impacts on natural, built or historic assets' however an Extended Phase 1 Habitat Survey may be required to identify the presence/absence of biodiversity interests on the site and to identify whether further surveys will be required, such as for protected species;
- 17. there are no public rights of way crossing the site. However development would provide an opportunity to improve connectivity for pedestrians and cyclists from Seagate Road to Wisbech Road and may lead to the route referred to being formalised.
- 5.25 <u>Conclusions on sites Los012, Los015 and Los030</u>— It is considered that sites Los012, Los015 and Los030 are some of the more suitable Potential Housing Sites in Long Sutton, and that they should be taken forward (as Los015), as a Preferred Housing Site:
 - the Sustainability Appraisal scores site Los015 with two positive (green) impacts being recorded for housing delivery and access to employment, although a further eight (blue) impacts could deliver positive impacts by securing meaningful infrastructure to meet the needs of future residents such as open space and school places; and
 - the majority of the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.25-0.5m', although site Los030 has a higher flood depth in 2115 as '0.5-1m' but it is expected that through design the majority of dwellings could be placed within lower hazard areas;
 - the site is adjacent to the Long Sutton settlement boundary so would form a natural extension to the built area without having a significant adverse impact upon the character of the area;
 - the SHLAA indicates that 'if it is allocated there is a reasonable prospect that it would be developed (assumed to begin in year 7, and be completed before year 15) [the plan is currently in year 6], so this site is considered to be deliverable, therefore able to contribute to the Council's five year supply of available housing sites;

• although the site attracted objections, none of the issues raised appear to be insoluble, or are particular to this site.

- 5.26 <u>Comments received</u> The following comments were made on sites **Los019** (Land to the south of Lancaster Drive, Long Sutton), Los020 (Land to the south of Spring Gardens, Long Sutton), Los006 (Land to the east of Station Road, Long Sutton) and Los009 (Land to the east of Station Road, Long Sutton):
 - 1. question the purpose of building a by-pass to infill it with housing road noise is debilitating to live with;
 - 2. these sites would have an impact on the largest number of residents; they are surrounded on three sides by housing;
 - 3. these sites would be accessed either directly from Station Road (which has a weight limit), or indirectly off Station Road via Dunlin Drive, therefore significantly increasing the traffic on Station Road. The access is in a 40mph section with limited visibility, it is likely to be a high risk area for traffic and pedestrians. The access onto the A17 is highly congested by cars and lorries, particularly at peak times. Additional traffic queuing will cause a significant impact along Station Road, creating congestion on this main route into Long Sutton. The access point from Lancaster Drive already serves smaller roads and is not wide road for additional traffic especially with a high level of on-road parking;
 - 4. as travel to work in South Holland is 10% higher than the national average and economic growth is predicted to remain slow in the early part of the Local Plan period, and the average house price is £152,000 and median wages in South Holland are £22,274 it is likely that some incommuting will continue for a proportion of the skilled labour force as local salaries will not support local house purchases. This will add to the traffic volumes on roads having an adverse impact upon the Primary School and elderly retired population;
 - 5. Skelton Drive and neighbouring roads is a quiet area consisting mainly of elderly retirees a similar community should be integrated into the area, complying with Government's requirement for a Cohesive Society;
 - the water table level is very high, flood risk could increase if the dyke is lost - the government's policy to cover past shortfalls in building is not verified in this case because it uses land classified by the Environment Agency as a flood zone;
 - 7. the A17 was constructed for the purpose of deviating traffic away from the villages and the proposals will bring it back;

- 8. the site capacity for the combined site would be 356 dwellings. The size, scale, layout and density would have an adverse impact on amenity and the character of the neighbourhood, and risks the loss of privacy, noise and nuisance pollution, loss of view and the environment may degrade. Such a high density housing scheme would be over- development, out of scale in Long Sutton;
- 9. if this development were to go ahead there would be no green/recreational areas in the south of Long Sutton;
- the owner of site Los006 confirms its availability for development now; discussions have been had with the landowners of sites Los019 and Los020 to bring these sites forward for development;
- 11. development of this site will assist in achieving the proposed total housing allocation for South Holland;
- 12. the development of the site could also provide a significant provision of affordable homes;
- 13. under Los019 are large drainage pipes that feed the surface water from Long Sutton into the drain on the western border. The depth of the drain and the nearby pond would present a serious hazard;
- 14. the development would adversely affect wildlife as there are many nesting birds that may lose their habitat;
- 15. SH IDB have access rights from Lancaster Drive to the drain for servicing and maintenance; this would need to continue.

5.27 Responses to the above comments:

- 1. these sites would provide a natural extension to Long Sutton and although development would extend the boundary of Long Sutton south, there would still be a significant separation of approximately 270m between the settlement boundary and the A17. This should be sufficient to minimise noise associated with the A17 but if necessary impacts can be reduced by site layout, house design, bunding/screening and acoustic vents to bedrooms facing the road;
- 2. it is accepted that the site is bounded on the northern, eastern and western boundaries by residential properties, but that is also true of other sites in Long Sutton, and indeed the plan area;

- 3. the Highways Authority identifies that 'Los019 appears to be accessible from the turning area at the end of Lancaster Drive although there may be a ransom strip. The site could be accessed through Los006 and Los020 where provision should be made to complete the road to the site boundary; Site Los020 may be accessible from Dunlin Drive although not solely and there may be a ransom strip. The site could be accessed through Los006 and provision should be made to the site boundary of Los019; a wide access to Los006 is available to Station Road/Cowpers Gate between two dwellings. Visibility on the traffic approach side is satisfactory. Visibility to the south is over the frontages of adjacent dwellings and could be compromised. Provision should be made to Los009 and Los020; site Los009 is accessible through Los006 where provision should be made to complete the road to the site boundary.' It appears that satisfactory access can be achieved, although this may not be as straightforward as for other sites. The Highways Authority has not indicated that the traffic associated with this development would create an adverse impact upon existing traffic levels in Long Sutton or road safety;
- 4. it is inevitable that new development will generate additional vehicle movements to places of employment or to shops and services. The identification of about 9.3ha of employment land in the Long Sutton/Sutton Bridge area may help encourage more sustainable transport options or shorter car journeys. The Highways Authority have raised no objection to the level of housing identified for Long Sutton or its potential impact upon schools or the locality;
- 5. the National Planning Policy Framework states that planning can play 'an important role in facilitating social interaction and creating healthy, inclusive communities' and aims to 'achieve places which promote opportunities for meetings between members of the community who might not otherwise come into contact with each other'. The design of new development should help ensure that any new housing site is well-integrated with existing neighbourhoods although this does not necessarily mean that new development will replicate the existing;
- 6. the majority of the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m', although site Los009 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '1.0-2.0m', one of the least sequentially preferable sites in Long Sutton;

- 7. new development will inevitably generate additional vehicle movements but the Highways Authority have raised no objections to the impact the traffic from new housing would have on the local road network;
- 8. it is inevitable that the development of this site would change the outlook of existing nearby dwellings, but this is equally true of all alternative sites. At the time of a planning application, the layout and design of a scheme would be carefully scrutinised to minimise overlooking and privacy loss. The SHLAA identifies that 381 dwellings could be achieved at an assumed density of 20/hectare, and it is not accepted that development at this density is high, or would be incompatible with local character;
- any new development of 10 or more dwellings would be expected to provide for recreational open space/play areas to meet the needs of its residents; given the size of this development it is expected that this would be provided on site, which would provide additional open space in this part of Long Sutton;
- 10. confirmation that Los006 is available is welcome, discussions with adjoining landowners is noted;
- 11. should the site(s) be allocated their development will contribute to the housing requirement for Long Sutton and South Holland;
- 12. recognition that the site could accommodate affordable housing is welcome:
- 13. it is common for new development in the Local Plan area to be developed on sites bounded by drains. The IDBs have robust guidance to ensure that an appropriate stand-off distance is adhered to and that the design of new development does not compromise residents safety;
- 14. the SHLAA identifies that the site 'will not have adverse impacts on natural, built or historic assets' however an Extended Phase 1 Habitat Survey may be required to identify the presence/absence of biodiversity interests on the site and to identify whether further surveys will be required, such as for protected species;
- 15. access rights for drains and other utilities infrastructure will be maintained through an easement and/or other legal mechanisms.
- 5.28 Conclusions on sites Los019, Los020, Los006 and Los009 It is considered that sites Los009, Los006, Los019 and Los020 are not one of the more suitable Potential Housing Sites in Long Sutton, and that they should not be taken forward as a Preferred Housing Site:

- overall the Sustainability Appraisal scores the site with two positive (green) impacts being recorded for housing delivery and access to employment, but scores three negative (orange) impacts relating to education facilities, soil, air and water quality and flood risk;
- the Highways Authority identifies that the access solution may not be as straightforward for these sites, as for others, which could impact upon viability and deliverability;
- the majority of the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m', although site Los009 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '1.0-2.0m', one of the least sequentially preferable sites in Long Sutton.

- 5.29 <u>Comments received</u> The following comments were made on sites *Los028* (Land to the west of Garnsgate Road, Long Sutton) and Los014 (Land to the west of Garnsgate Road, Long Sutton):
 - 1. the density of development should reflect the more limited densely populated area;
 - 2. the owner of Los028 confirms that the site is no longer available;
 - 3. there is no access to Los014 a property would need to be demolished for entry; Garnsgate is a main route for children to the primary school and is dangerous without introducing another junction and additional traffic:
 - 4. electricity cables would need relocating or burying for a development to take place;
 - 5. the sewers / drains on Garnsgate already flood and get blocked and would need upgrading;
 - 6. the land is surrounded by bungalows and any new development would need to be raised in line with flood risk, this would result in overlooking. The site is not large enough to soften the impact of the height;
 - 7. the site would not be viable for any affordable housing due to all the additional infrastructure costs and the costs of purchasing access.

- 5.30 Responses to the above comments:
 - 1. 39 dwellings has been derived from an assumed density of 20/hectare, and it is not accepted that development at such a density would be incompatible with local character;
 - 2. confirmation that site Los028 is no longer available is noted;
 - 3. the Highways Authority identifies that 'the site provides access between existing dwellings which is unsuitable but could be made suitable if dwelling(s) were demolished. This is important because the site appears to provide access to Los027 and Los028 and all three need to be developed as one.' It appears that a satisfactory access could be achieved, but the provision is less straightforward than for most other sites:
 - 4. it is accepted that electricity cables may need re-routing or undergrounding to enable development to take place;
 - 5. Anglian Water have identified that the sewerage network is capable of accommodating foul water from both sites but the capacity of the surface water network has major constraints, and all developments should seek to reduce flood risk and incorporate Sustainable Drainage Systems (SuDS). However, such issues are not unique to sites Los028 and Los014 they apply equally to all alternative sites elsewhere in Long Sutton, and indeed throughout the Plan area;
 - 6. the Environment Agency identifies that 'FFL would need to be set 1m above ground level, flood resilient construction shall be used to a height 300mm above the predicted flood level (single storey proposals must consider the 0.1% + climate change event for setting FFL).' It is accepted that houses could be built adjacent to bungalows, which has happened in other parts of Long Sutton although care would need to be taken to ensure the amenity of residents is maintained. This would be addressed through the planning application process;
 - 7. the SHLAA identifies that 'opening-up infrastructure costs are likely to be low (although flood mitigation is likely)'. It appears that a development could be capable of delivering affordable housing.
- 5.31 Conclusions on sites Los028 and Los014 It is considered that sites Los028 and Los014 are not some of the more suitable Potential Housing Sites in Long Sutton, and that they should not be taken forward as a Preferred Housing Site:

- the Sustainability Appraisal scores sites Los028 and Los014 with three positive (green) impacts being recorded for housing delivery, landscape character and access to employment, but four negative (orange) impacts recorded relating to accessibility, education, access to community facilities and flood risk;
- the Highways Authority identifies that the proposed site access between existing dwellings 'is unsuitable but could be made suitable if dwelling(s) were demolished'. It appears that a satisfactory access could be achieved, but the provision is less straightforward than for most other sites:
- site Los028 is no longer available as a potential housing site so can no longer be considered for housing development in the Local Plan.

6 NEW SITES

- 6.1 The following six new sites were put forward for consideration as Potential Housing Sites:
 - 1. Los043 Land to the south of Bridge Road, Long Sutton. The SHLAA identifies this site as being developable although the site borders onto existing and proposed industrial uses to the north and east, and these may impact upon the amenities that would be enjoyed by any dwellings;
 - 2. Los044 Land to the south of Bridge Road, Long Sutton. The SHLAA identifies this site as being undevelopable because it is neither within or adjacent to the settlement boundary of Long Sutton, and the site's development would have adverse visual impacts it would extend the town's built-up area eastwards along Bridge Road, whilst other options can consolidate the built-up area. Furthermore, the character of local development is predominantly commercial/industrial, and the introduction of a residential estate in this location would appear incongruous. So this site would conflict with the Local Plan's locational strategy and would have an adverse impact on the character of the area;
 - 3. Los045 Land to the west of Seagate Road, Long Sutton. The SHLAA identifies this site as being undevelopable because it would have adverse visual impacts considered in isolation, the site's relationship to the town's existing built-up area would be unsatisfactory. If it was developed with or following sites Los006, Los009, Los019, Los020 and Los046, this issues would be overcome, however these sites have been discounted;

- 4. Los046 Land to the east of Station Road, Long Sutton. The SHLAA identifies this site as being developable because it is a small-scale site located adjacent to the Long Sutton settlement boundary and would not have adverse visual impacts on the area's character or appearance the site already contains buildings, and is largely hidden from view behind existing frontage dwellings;
- 5. Los047 Land to the west of Garnsgate Road, Long Sutton. The SHLAA identifies this site as being undevelopable because there is no obvious access from Garnsgate Road and, whilst an access from Lutton Garnsgate might in theory be possible, it would be likely to require the removal of trees (and hence would not be desirable). In practice, the site is likely to be developed in conjunction with neighbouring sites (Los014, Los027 and Los028), which have been discounted. The site is also one of the least sequentially preferable in terms of flood risk in Long Sutton;
- 6. Lut020 Land to the west of Lutton Gowts, Long Sutton. The SHLAA identifies this site as undevelopable because the site is neither within nor adjacent to the Long Sutton settlement boundary and would create an incongruous and isolated estate of dwellings in the countryside, which would appear unrelated to the existing settlement pattern.

7 PREFERRED OPTIONS HOUSING ALLOCATIONS AND TRAJECTORY

- 7.1 The following sites are taken forward as Preferred Options Housing Allocations: Los008; Los015 (includes Los012 and Los030); Los026 and Los046. These five sites have a combined capacity of 307 dwellings, which is only slightly higher than the residual requirement of 304 dwellings.
- 7.2 These allocations and other development opportunities provide the following trajectory for Long Sutton. [The capacity of the sites assumes that they will be developed at a density of 20 dwellings to the hectare. In practice, some sites are likely to accommodate a higher density.]

	Years	Years	Years	Years	Years	Years	TOTAL
	1-5	6-10	11-15	16-20	21-25	26+	
Completions	96	-	-	-	-	-	96
Commitments	0	160	-	-	-	-	160
Los008	0	24	12	0	0	0	36
Los015	0	50	125	40	0	0	215
Los026	0	24	18	0	0	0	42
Los046	0	12	2	0	0	0	14
TOTAL	96	270	157	40	0	0	563

