

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

1 MOULTON'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 Moulton as a 'Minor Service Centre'.

1.2 **Comments received** - The following comments were received concerning Moulton's position in the Spatial Strategy:

1. We wish to comment and support the proposed Settlement Spatial strategy Policy 2. We are pleased to note that Moulton has been designated a Minor Service Centre settlement, and agree that it is a large and important provider of local facilities, so has rightly been categorised in this way. However, we still believe a greater allocation of the housing need, should be distributed to the villages, as will provide a more beneficial spread of diversity to life for the residents of the district area, and further help support the existing Local services, and perhaps provide the opportunity to provide further facilities.
2. We support the identification of Cowbit, Moulton and Weston as Minor Service Centres.
3. We support the identification of Cowbit and Moulton as Minor Service Centres. Both are settlements which have scored well in the Sustainability of Settlements Study, and they are also each locations which are less at risk from flooding than is the case for many of the settlements in the Plan area. They are therefore entirely suitable locations for development which can help to meet local housing needs and continue to sustain existing services. As we have noted in our representations concerning Policy 12, both of these settlements have capacity to accommodate higher levels of development than is currently proposed, and given that they are sustainable locations, we believe that they should do so. This is also consistent with our separate representations on Policy 11, concerning the proposed housing target for the Plan area, which we believe is too low.

1.3 **Responses to the above comments:**

1. The support for Moulton's position in the Spatial Strategy is welcome.
2. Policy 11 says "provision will be made for a net increase of at least..." Therefore, the approach we are taking provides flexibility and are not ceiling figures.

2 MOULTON '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 Moulton to provide for 190 dwellings between April 2011 and 31st March 2036.

2.2 **Comments received** - The following comments were received concerning Moulton's housing requirements:

1. We consider the proposed Policy 12 , which provides for 190 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 250 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement, than the current Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Moulton with its very good existing level of village services.
2. 4 letters were received that raise similar issues relating to current infrastructure and facilities in Moulton, their ability to cope with existing and future development, and funding for improvements:
 - Drs surgeries are bursting and need expanding
 - Roads are narrow and need improving and development densities need to be reduced to help the roads cope with the traffic
 - Water run-off and sewerage problems must be addressed
 - Schools are over stretched
 - Lack of employment
 - Loss of agricultural land

3. Moulton is less constrained by flood risk than many other similarly sized and larger settlements, and that it has also been shown to be a sustainable location for new development. Moulton has scored well in terms of its sustainability as a location, due to its good range of facilities. It scored 71 in the Sustainability of Settlements Study, a score which was only a little lower than some of the Main Service Centres. Moulton serves an important role as a service centre to its population and that of the nearby rural area. This role can only be maintained in future through the provision of new housing, which will create continued demand for the services and facilities within the town. In this context, we support the draft Local Plan's provision of at least 190 new dwellings in Moulton, although as we explain in our representation concerning Policy 11, we believe that a higher level of housing is required to meet the needs of South East Lincolnshire, and so the target for Moulton should also be increased proportionately.
4. Considerations also have to be given to the main route into Moulton Chapel and towards Moulton. At peak times during the day this is already a very busy road with vehicles travelling to and from the bypass at very high speeds through the village. A major accident is just waiting to happen and the risk will only increase with more vehicles coming into the village. Please reconsider the suggested allocation for the village as the proposed amount is far too high.

2.3 **Responses to the above comments:**

1. The support for Moulton's proposed housing requirement of 190 dwellings is noted. We will reconsider housing numbers when we receive updated population data. Policy 11 says "provision will be made for a net increase of at least..." Therefore, the approach we are taking provides flexibility and are not ceiling figures. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to reduce the number of dwellings proposed in Moulton.
2. The Local Plan will be supported by an Infrastructure delivery Plan which will demonstrate how arising infrastructure needs will be met. The provision of employment land is influenced by employment land studies, which along with other studies to show our "Objectively Assessed Housing Needs" result in agricultural land being developed. The loss is minimised but cannot be avoided in order to meet our needs.

3. The support for Moulton's proposed housing requirement of 190 dwellings is noted. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to reduce the number of dwellings proposed in Moulton.
4. Based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to reduce the number of dwellings proposed in Moulton.
- 2.4 Owing to these comments it is considered that a change to Moulton's housing requirements is required and the Local Plan should identify housing allocations in Moulton for 90 dwellings between April 2011 and 31st March 2036.

3 MOULTON 'S RESIDUAL REQUIREMENTS

- 3.1 **Completions** - Between 1st April 2011 and 31st March 2016, 17 new dwellings were built in Moulton.
- 3.2 **Commitments** - As at 31st March 2016, planning permission was outstanding for the construction of 6 dwellings in Moulton, and there is no evidence to suggest that this permission will not be implemented during the Plan period.
- 3.3 **Residual requirement** - Given the above figures, the identification of land to accommodate approximately 67 dwellings is required. (90 – 17 – 6 = 67)

4 INFRASTRUCTURE

- 4.1 **Education** – the County Education Department has previously commented that Moulton has a lack of capacity at primary and secondary levels and constrained site areas.
- 4.2 **Flood risk** – the Environment Agency has previously been consulted in relation to the submitted sites for Moulton and has made the following comments:
 - No Hazard' for Mou023 may not be correct as hazard mapping not undertaken for this settlement. Need to consult South Holland IDB re Moulton Mere drain
 - Consult South Holland IDB to ascertain if there is a risk on its drain. Allocation of Mou023 would need info to demonstrate that it can pass the NPPF Exceptions Test.
- 4.3 South Holland IDB have previously advised their target standards of protection are; water levels 0.6m below land level for a 1 in 10 year event for agriculture and 0.3m below land level for a 1 in 100 year event for development. They are undertaking flood modelling which is not yet complete.

- 4.4 Anglian Water has previously commented that the surface water network capacity has major constraints and all sites should seek to reduce flood risk and incorporate Sustainable Drainage Systems.
- 4.5 **Sewage Treatment** – the Environment Agency has previously commented that Moulton water recycling centre has capacity for 353 dwellings. Anglian water has previously commented that the water recycling centre and the foul sewage network requires upgrading.
- 4.6 **Water Supply** – Anglian Water has previously commented that there is adequate water capacity to meet the proposed development but the supply network would require upgrading.
- 4.7 **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.

5 MOULTON SITE OPTIONS

- 5.1 Inset Map 22 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016) identified four 'Potential Housing Sites', Mou003, Mou016, Mou022, and Mou023.

- 5.2 **Comments received** - The following comments were made on site ***Mou003 (Land to the north of Broad Lane, Moulton)***:

1. Within Moulton, site Mou003 is one of the most suitable locations for new development. It is located entirely within Flood Zone 1, and so we understand why it is one of only a few potential housing sites which the Councils have shortlisted for inclusion within the draft Local Plan. The site is entirely deliverable. A full planning application (H-13-0013-15) has already been submitted for a residential development of 39 dwellings.
2. A very detailed response has been received about Mou003, which as mentioned above, is also subject to a planning application. The main points raised are:
 - There is no evidence that building on MOU003 will comply with Policy 2b and 2d:
 - High Flood Risk. Existing flooding will be exacerbated by further development and permeable paving is not sustainable. Brand new it has an efficiency of 50% and after ten years only 20%.
 - There is no demonstrable local need.
 - New housing in Holbeach remains unoccupied.
 - Within a 10 mile radius of Spalding there are 1073 houses (excluding bungalows or flats/apartment) for sale and that volume has remained unchanged for two years.

- There is a consistent supply of rental property.
 - One of the fourteen new properties built on the edge of Moulton in 2009 as “local need” was occupied by a family from the South Holland area. The remainder came from outside the region.
 - Insufficient capacity for Sewerage. The local processing plant is already beyond capacity and is having to use tanker lorries to take effluent away that it cannot process.
 - There is insufficient data to make a properly thought out plan and proposals are unsupported with factual evidence (the respondent does admit they are more specific to the planning application H13-0013-15).
 - Public Transport is inadequate and fails to comply with national guidelines.
 - I object to building on grade one agricultural land. The Countryside of South East Lincolnshire is a precious resource, mainly in its role for agriculture but for recreation.
 - Local services are insufficient to support including MOU003:
 - School over subscribed
 - Surgery at capacity
 - No energy infrastructure to the site
 - Sewerage already at over capacity
 - Surface water drainage at capacity
 - Public transport is infrequent and too far from the site
 - There are no cycle routes
 - There are no direct footpaths to the site.
 - Moulton has no public recreational open space. The John Harrox playing field is privately owned and “The Park” is protected conservation land not open to the public either.
3. As you are aware, the Board have in recent years undertaken a programme of hydrological modelling across the whole of its district. We have drainage concerns at the following locations within the local plan: Sites Mou003, 016, 022. This area has no Board's watercourses in the vicinity and as such some improvement in the drainage system may be required if it is to be developed.

5.3 Responses to the above comments:

1. The support for Mou003 is welcome. The site is adjacent existing development and is a reasonable extension to the settlement that will have limited impact on the character of the area. The sustainability appraisal shows the site has 3 positive, 1 neutral, 7 uncertain and 2 negative impacts and places it second of the 4 sites in Moulton.
2. This is a very detailed consultation response.
 - Residential development does support local facilities.
 - The reference to Policy 2d is incorrect because the purpose of this plan is to consider changing the site's current status as countryside to an allocated housing site.
 - The site is in Flood Zone 1 and is one of the best sites in Moulton. It also does not appear to be affected by surface water flooding. The planning application, if granted will require a drainage strategy to be approved.
 - Local Authorities are required to meet their "Objectively Assessed housing needs" and therefore we are required to allocate land for housing.
 - Waste water and foul sewerage network does require upgrading and this will be a matter for the developer and the relevant authorities.
 - Some of the items listed as missing evidence are too specific for this strategic level and relate to the planning application. Some will be dealt with at a strategic level through the Infrastructure Delivery Plan.
 - The Sustainability Assessment indicates this site does not score as well as Mou023 for transport but overall the site is the second best.
 - Building on agricultural land is unavoidable. The planning system seeks to minimise the amount lost.
 - The Infrastructure delivery plan will tackle some of the issues raised. Others will be addressed by the developer.
 - The proposal includes open space.

5.4 **Conclusions on site Mou003** – It is considered that site Mou003 is a suitable Potential Housing Site in Moulton, and that it should be taken forward as a Preferred Housing Site because:

- The site is adjacent existing development and is a reasonable extension to the settlement that will have limited impact on the character of the area. The sustainability appraisal shows the site has 3 positive, 1 neutral, 7 uncertain and 2 negative impacts and places it second of the 4 sites in Moulton.
- A planning application has been submitted on the site, making at this stage, until a decision has been taken on the planning application, delivery more likely than other sites being considered in Moulton.

5.5 **Comments received** - The following comments were made on site ***Mou016*** (***Land to the east of Broad Lane, Moulton***):

1. On behalf of our client, we very much support the proposal to include the site Mou 016. It completes a form of development close to the village centre, and its development for housing will be a logical infill to the development already in the location, as routinely seen in rural villages, following which, the new housing and families will be able to further support local services.
2. As you are aware, the Board have in recent years undertaken a programme of hydrological modelling across the whole of its district. We have drainage concerns at the following locations within the local plan: Sites Mou003, 016, 022 this area has no Board's watercourses in the vicinity and as such some improvement in the drainage system may be required if it is to be developed.
3. I would like to comment on the Local Plan for South East Lincolnshire particularly in regards to the developments for Moulton Village. Whilst I appreciate the need for additional housing within the area, I find it incongruous that the majority of the development is concentrated around the south west corner of Moulton. This despite a number of other areas within Moulton for development under the South East Lincolnshire Strategic Housing Land Availability Assessment. I feel that these developments, in particular Mou016 and Mou022, will place too much strain on the local roads, namely Begger's Bush Lane, Broad Lane and West Cob Gate, especially when taken in conjunction with the proposed developments in the adjacent village of Weston, some of which are also along the same road (Wsn010).

5.6 **Responses to the above comments:**

1. Support for Mou016 is welcome. The Sustainability Assessment shows the site is the third best site with 2 positive, 1 neutral, 7 uncertain and 3 negative impacts. However, the site extends beyond Ashby Gardens into the countryside and appears incongruous, despite the isolated single dwelling adjacent the site. The drainage board are concerned about the drainage facilities in the location for this site as well as Mou003 and Mou022. The County Highways department have also advised that Broad Lane is wide enough to accommodate vehicle movements associated with the development of this site, but would increase vehicle movements past the school, where parental parking has been the cause of objections to the planning application on Mou003. Access to Mou003 will influence the position of the access to this site as access onto Broad Lane beyond the western West Cobb Gate junction would not be acceptable owing to remoteness. Also the land is higher than the road, requiring some substantial engineering works and there is no footway. It is, therefore, considered that the site should be reduced in size so that it extends no further than Ashby Gardens. This will reduce the amount of traffic using Broad Lane past the school and the drainage volumes. The access would need to be on West Cob Gate to the north of the site.
2. The four sites that are shown on the plan as Potential Housing Sites are considered the most appropriate. Twelve other sites submitted to the SHLAA were considered unsuitable owing to:
 - Being incongruous with, or isolated from, the settlement
 - Having an unsuitable access
 - Possible noise disturbance
 - Its impact on listed buildings, TPO's and rural character.

5.7 **Conclusions on site Mou016** – It is considered that site Mou016 is an unsuitable Potential Housing Site in Moulton, in its current form, but if it is reduced in size it should be taken forward as a Preferred Housing Site because:

- The Sustainability Assessment shows the site is the third best site. However, the Drainage Board and the County Highway Department have concerns about the site. In addition it protrudes into the countryside, which will harm the character of the area because it does not round off the village. Reducing the size of the site will ameliorate these issues.

5.8 **Comments received** - The following comments were made on site ***Mou022 (Land to the east of Broad Lane, Moulton)***:

1. I would like to comment on the Local Plan for South East Lincolnshire particularly in regards to the developments for Moulton Village. Whilst I appreciate the need for additional housing within the area, I find it incongruous that the majority of the development is concentrated around the south west corner of Moulton. This despite a number of other areas within Moulton for development under the South East Lincolnshire Strategic Housing Land Availability Assessment. I feel that these developments, in particular Mou016 and Mou022, will place too much strain on the local roads, namely Begger's Bush Lane, Broad Lane and West Cob Gate, especially when taken in conjunction with the proposed developments in the adjacent village of Weston, some of which are also along the same road (Wsn010).
2. As you are aware, the Board have in recent years undertaken a programme of hydrological modelling across the whole of its district. We have drainage concerns at the following locations within the local plan: Sites Mou003, 016, 022 this area has no Board's watercourses in the vicinity and as such some improvement in the drainage system may be required if it is to be developed.

5.9 **Responses to the above comments:**

1. The four sites that are shown on the plan as Potential Housing Sites are considered the most appropriate. Twelve other sites submitted to the SHLAA were considered unsuitable owing to:
 - Being incongruous with, or isolated from, the settlement
 - Having an unsuitable access
 - Possible noise disturbance
 - Its impact on listed buildings, TPO's and rural character.
2. This site scored the worst of all 4 sites in the Sustainability assessment. It received no positive impacts. It is a very large site which would accommodate nearly the entire residual requirement and have a significant impact on the character and appearance of this part of Moulton. The existing highway access is unsuitable and an access on to Broad Lane is isolated. An access through Mou016 would place greater burdens on Broad Lane where there are already reported difficulties.

5.10 **Conclusions on site Mou022** – It is considered that site Mou022 is not a suitable Potential Housing Site in Moulton, and that it should not be taken forward as a Preferred Housing Site because:

- It is too large, has highway issues and has a significant impact on the character and appearance on this part of Moulton.

5.11 **Comments received** - The following comments were made on site **Mou023** (***Land to the east of Church Lane, Moulton***):

1. Overall, on behalf of our client, we very much support the proposal to include the site Mou 023. It completes a form of development close to the village centre, and its development for housing will be a logical infill of the road frontage and in keeping with development already in the location, and as routinely seen in rural villages, following which, the home occupiers will be able to further support local services.

5.12 **Responses to the above comments:**

1. The support for Mou023 is welcome.

5.13 **Conclusions on site Mou023** – It is considered that site Mou023 is a suitable Potential Housing Site in Moulton and that it should be taken forward as a Preferred Housing Site because:

- It is a small frontage site which scored the most positive impacts in the Sustainability Assessment. It, however, has the worst flood risk, being in Flood Zone 3a.
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6 **NEW SITES**

6.1 The following new site was put forward for consideration as Potential Housing Sites:

1. Mou 041 – Moulton. The Strategic Housing Land Availability Assessment identifies this site as undevelopable because of conflict with the Plan's locational strategy, adverse environmental impacts, and the lack of a suitable vehicular access

7 **PREFERRED OPTIONS HOUSING ALLOCATIONS AND TRAJECTORY**

7.1 The following sites are taken forward as Preferred Options Housing Allocations: Mou003, Mou016, and Mou022. These sites have a combined capacity of 65 dwellings, which is slightly below the residual requirement of 67 dwellings.

7.2 These allocations and other development opportunities provide the following trajectory for Moulton.

	Years 1-5	Years 6-10	Years 11-15	Years 16-20	Years 21-25	Years 26+	TOTAL
Completions	17	0	0	0	0	0	17
Commitments	0	6	0	0	0	0	6
Mou003	0	24	14	0	0	0	38
Mou016	0	12	5	0	0	0	17

Mou023	0	10	0	0	0	0	10
TOTAL	17	52	19	0	0	0	88

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Moulton

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