

Post_title: **15: Fishtoft**

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1:

1476

comment_author: Guy Dix

comment content:

Fis046 I am concerned to see that this proposed area of development only has one road access off Gaysfield Road. This is directly next to Fishtoft Scout Hut and would separate the building from the green activity field which is highlighted on the plan as a green protected area. The Building is used by a Nursery 5 days a week, and the scout group 3 nights a week plus various weekends, the activity field is used by the nursery and the scouts on a regular basis, also the Primary School opposite use the field. Whilst the school would still have one road to cross to access the field, at present the nursery and scouts are able to access the field very safely with no risk of cars etc. The Development would restrict the access to the green activity field and if it went ahead the field would need to be completely fenced in for safety of the young people. Whilst I am not in disagreement with the proposed development there would need to be strict planning regulations to ensure that the safety of our young people was paramount and that the developer would accept the full costs of these to the satisfaction of all parties to include proper fencing and controlled crossings.

Looking at the outline plans there does not appear to be another viable road access to this area and this is a concern with the number of houses suggested. Gaysfield road is a narrow road and the addition of an extra footpath could make it narrower and would it be safely be able to cope with the extra traffic 54 houses will bring?

Officer Comment:

The consultee is quite correct that the access road to serve site Fis046 would be located between the Scout Hut and its associated playing field (and indeed would take up a small part of the playing field). However, it is considered that the issues raised do not affect the potential suitability of the site for allocation, but would need to be addressed at planning application stage.

The Highway Authority identifies that it would be possible, with a suitable junction off Gaysfield Road, to develop this site for the suggested 54 dwellings. The footway on the east side of the road would need to be extended up to the site entrance

Officer Recommendation:

Site Fis046 should be taken forward as a Preferred Housing Site.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 1477 comment_author: Natural England

comment content:

Natural England has some concern with the following sites: FIS022, FIS041 and FIS046 around Fishtoft “ these site are partly within land highlighted by our Impact Risk Zones (IRZ) as functionally linked to the Wash Special Protection Area (SPA) where Pink Footed Geese have been known to forage

Officer Comment:

These sites are all relatively small in size (the largest has an area of 2.69 hectares), and it is considered unlikely that their development would impact significantly upon the Pink Footed Goose population. However, although sites Fis022 and Fis041 are considered to be developable, they are not considered to be amongst the best potential housing sites in Fishtoft. Consequently, they are not proposed to be taken forward as Preferred Housing Sites. In contrast, site Fis046 is considered to be amongst the best potential housing sites in Fishtoft, and consequently is proposed to be taken forward as a Preferred Housing Site.

Officer Recommendation:

Sites Fis022 and Fis041 should not be taken forward as Preferred Housing Sites.

Site Fis046 should be taken forward as a Preferred Housing Site.

ID1: 1478 comment_author: Hume Planning Consultancy Ltd

comment content:

Broadgate are firmly of the view that sites in Fishtoft represent sustainable development in what is a rural district and that greater weight should be given to development in the villages in which the majority of people live.

The following site is capable of providing additional dwellings as follows: Fishtoft, Whitehouse Lane - A site of 19 dwellings

Officer Comment:

The scale of growth proposed for Fishtoft took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements and their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. The objection does not seek to address any of these issues, and does not set out any substantive arguments to justify an increase.

The site cannot be identified from the information supplied

Officer Recommendation:

No change to Fishtoft's housing requirement is necessary.

No change is necessary.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 1480 comment_author: Clive Wicks Associates

comment_content:

Has resubmitted part of Fis004. Planning application submitted for 29 dwellings, 40% are allocated to social landlord. It is on highest land in village and brings the church into the village rather than on the outskirts. Fishtoft proposed as a service village for 50 dwellings and site is less damaging to the village than Fis041 and less risky flood risk.

Officer Comment:

This site has been registered as Fis048. The Strategic Housing Land Availability Assessment (SHLAA) identifies this site as being undevelopable because it would have adverse environmental impacts.

Officer Recommendation:

Site Fis048 should not be taken forward as a Preferred Housing Site.

ID1: 1481 comment_author: Clive Wicks Associates

comment_content:

Comments that Fis046 is immediately available, is 1m higher than Fis040,041 & 022 and so sequentially in advance of those sites. A planning application could be submitted in 6 months and commenced within 2 years.

Officer Comment:

The support is welcomed, and the site's owner is quite correct that flood risk is considerably lower for site Fis046 (flood zone 3a, no hazard, no hazard) than for Fis040 (zone 3a, danger for most, 0.5m to 1.0m), or Fis041 and Fis022 (zone 3a, danger for all, 1.0m to 2.0m).

Officer Recommendation:

Site Fis046 should be taken forward as a Preferred Housing Site.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 1482 comment_author: Fishtoft Parish Council

comment content:

Members of Fishtoft Parish Council have looked at great length at the Local Plan 2011 - 2036 and wish to make comments as follows:- What research has been done with regard to who will occupy the proposed properties; where are the survey results; who completed the surveys and when were they done? Where is the proof that such a large amount of additional housing is needed Would it not be better for brown field sites to be used rather than earmarking green field sites, in many cases using valuable agricultural land Concerns as to where such a large number of new residents would work, there is a lack of employment in the area Some villages appear to have no proposed developments which would help to sustain those communities

Officer Comment:

The Plan's housing numbers generally have been derived from the findings of the Strategic Housing Market Assessment (SHMA), and the scale of housing growth proposed for Fishtoft village took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credential (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. It is agreed that redeveloping developable brownfield sites is preferable to developing greenfield sites, but sufficient well-located brownfield sites are not available in Fishtoft to meet the village's needs. The SHMA's findings took account of economic/employment issues. Policy 2 of the Local Plan identifies 43 settlements as 'areas of development restraint', where specific housing allocations will not be made.

National policy identifies that sites allocated in a Local Plan must be suitable, available and deliverable over the plan period. The land identified in/adjacent/within close proximity to Fishtoft reflected the availability of sites in January 2016. While it is accepted that no employment sites have been identified in the Fishtoft area, Fishtoft is 1km from Boston settlement boundary and the wide range of employment opportunities that are available there.

Officer Recommendation:

No change is necessary.

ID1: 1483 comment_author: Paul & Samantha Pick

comment content:

With reference to Fis004, Fis011, Fis026: Flood Risk - You have classified this site as Flood risk zone 3a on your assessment which I don't understand as the Environment Agency show half of this site in the white area on their Flood Maps yet the flood risk areas are in the green, yellow, orange and red zones. Why have you done this? You have marked the site as undevelopable but I don't think you have considered the fact that this site actually has the lowest flood risk, in fact, no flood risk. On the Environment Agency Maps there are no other villages to the North East of Boston that have any white areas at all, including Butterwick, Old Leake and Wrangle (the other allocated Service Villages). So this site must have the least flood risk in the area as it doesn't have any. Village Boundary - In my opinion, the flood risk hazard provides a strong and defensible boundary to the villages built up area. This should be given due weight when assessing the boundary extension rather than using an arbitrary measure such as a road. I would have thought that the new Local Plan was meant to establish the village boundaries and after the floods in 2013, that flood risk was a lot more important criteria to use. Countryside Character - 70% of the site is surrounded by other properties including large fences and hedges along their boundaries. Therefore, only 30% of the site is exposed to open countryside meaning this would be more of an infill development rather than have an effect on the open countryside. It would also bring the church into the centre of the Village rather than it being on the edge of it.

Fis022 and Fis041: Knowing the way the land drops away in Fishtoft as you move away from the Church, I

Officer Comment:

Land to the north of Clampgate Road and east of Burton Croft Road, Fishtoft has been submitted in eight separate formats (Fis004, Fis011, Fis026, Fis027, Fis028, Fis029, Fis030, and Fis048). The Strategic Housing Land Availability Assessment (SHLAA) identifies them all as being undevelopable, because they will have adverse environmental impacts. In particular, the concern is that the site's development would have adverse impacts upon listed buildings to their south, and upon the character and appearance of the area, by extending the village's built-up area into an area with a countryside character (with Clampgate Road and Burton Croft Road currently providing a strong and defensible boundary to the village's built-up area). The sites have not been classified as undevelopable in flood risk terms.

Turning to flood risk issues, whilst the Environment Agency's flood hazard 2115 data identifies southern parts of the land as being exposed to 'no hazard', as one moves northwards over the site, the hazard increases through 'low hazard', 'danger for some', and 'danger for most', until the northern 0.69 hectares is at 'danger for all'. Once again, however, it must be stressed that the SHLAA's classification of these various sites as undevelopable does not hinge upon flood risk issues - rather on their impacts upon listed buildings, and the area's character and appearance.

Flood risk at sites Fis022 and Fis041 is assessed as 'danger for all' and '1.0m to 2.0m'. If more detailed survey work identified that the 2115 flood depth was less than 1.6m, whilst proposals would need to be a minimum of 2 storey with Finished Floor Level (FFL) set

Officer Recommendation:

Sites Fis004, Fis011, Fis026, Fis027, Fis028, Fis029, Fis030 and Fis048 should not be taken forward as Preferred Housing Sites.

Sites Fis022 and Fis041 should not be taken forward as Preferred Housing Sites.

Site Fis046 should be taken forward as a Preferred Housing Site.

believe that Fis022 and Fis041 are so low lying that you would have to build 3 story houses on them with the ground floor as uninhabitable accommodation. Such 3 story houses would be totally unacceptable and out of place in a village setting such as Fishtoft. Fis046: The size of this site is enormous. Your assessment shows up to 81 dwellings on this site. This site alone would provide over 60% more dwellings than the whole allocation of 50 dwellings for Fishtoft village for 20 years. This is without taking into account Fis040 that is currently subject to a planning application for 20 dwellings and is expected to be approved shortly. This would leave Fis046 providing nearly 300% more dwellings than the remaining allocation of 30 dwellings for the next 20 years. So as well as placing too much reliance upon meeting Fishtoft's allocation upon this one site, it is not anticipated that the development will start before year 9 at the earliest, therefore even a small delay would negate your ability to provide a 5 year housing supply. I believe this site is way too large to be developed in Fishtoft and a much smaller site would be more appropriate.

a minimum of 1m above ground level, there would be no requirement for the ground floor to consist of non-habitable accommodation. If, on the other hand, the 2115 flood depth was more than 1.6m, proposals would need to be a minimum of 2 storey with no ground floor habitable accommodation - in these circumstances, 3-storey dwellings would be likely. These sites appear to be unsuitable for single-storey development, and flood risk issues may dictate that three-storey dwellings would be likely. However, whilst it may be more challenging to assimilate such dwellings with their surroundings, it is not accepted that 3-storey dwellings would be inherently unsuitable in a village context. Nonetheless, although sites Fis022 and Fis041 are considered to be developable, they are not considered to be amongst the best potential housing sites in Fishtoft, and consequently are not proposed to be taken forward as Preferred Housing Sites.

At an assumed density of 20 dwellings to the hectare, site Fis046 would deliver 54 dwellings, which is broadly in scale with the 50 dwellings sought for Fishtoft. Site Fis046 is considered to be amongst the best potential housing sites in Fishtoft, and consequently is proposed to be taken forward as a Preferred Housing Site.

ID1: 1484 comment_author: Mr Simon Foster

comment content:

Fis046: I consider the proposed development Fis046 of being put anywhere. Having lived in Fishtoft the development is unsuitable in that location, and is positioned behind existing properties without the thought of the impact of visually destroying beautiful area of the village. Fis046 seems to be a development not thought of for all the existing properties adjacent, and no consideration for the surrounding environment. Fishtoft Manor is adjacent, that and adjacent buildings are to English Heritage approval and standards, and therefore the development too would have to be in-keeping to those standards of the English Heritage. The school is of insufficient size for these possible developments of the village. The siting of this proposed development site would cause additional traffic outside and passing the school, which would increase the dangers to children.

An ideal/better location to cause less impact would be adjacent Fishtoft Road opposite Gilder Way towards Ivy farm. This will run with the village, and is immediately adjacent the main road and bus route. Or the extension of Fis022 towards Ivy Farm too. The road network to/from Fishtoft is insufficient for additional traffic, especially approaching Skirbeck, Haven Bridge, and Main Ridge East. This must be addressed, as traffic is ever increasing and these developments and others will cause more issues.

Officer Comment:

It is not agreed that site Fis046 would have adverse impacts upon the character and appearance of the area, because public views into the site are limited. It is inevitable that the development of this site will change the outlook of existing nearby dwellings, but this is equally true of all alternative sites. The site abuts the grade 2 listed Fishtoft Manor, the setting of which has been compromised on the north side by new dwellings. The development of site Fis046 is likely to have a further detrimental effect on the setting of the listed building unless it can be organised in such a way as to have a green landscaped space where it abuts the listed building's garden. This could assist in its mitigation, and would need to be carefully assessed and designed. The County Education Department has commented that there appears to be local capacity at primary level to accommodate this scale of housing. The Highway Authority identifies that it would be possible, with a suitable junction off Gaysfield Road, to develop this site for the suggested 54 dwellings. The footway on the east side of the road would need to be extended up to the site entrance.

The support for site Fis022 is welcomed. However, although site Fis022 is considered to be developable, it is not considered to be amongst the best potential housing sites in Fishtoft, and consequently is not proposed to be taken forward as a Preferred Housing Site.

Officer Recommendation:

Site Fis046 should be taken forward as a Preferred Housing Site.

Site Fis022 should not be taken forward as a Preferred Housing Site.

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ID1: 1485 comment_author: Gloria Moore

comment content:

Subject: Local Plan Fishtoft re: Fis004, Fis011, Fis026, Fis 027, Fis 028, Fis029, Fis030, FIS022, Fis040, Fis041, Fis046. I write with regard to the land at the north of Clampgate Road, Fishtoft (Fis004, Fis011). I am one of the owners of this site and you will be aware of the current planning application relating to this site. In this respect, I would be grateful if you would take account of my comments with regard to the following sites. Fis004, Fis011, Fis26: Flood Risk You have classified this site as being in Flood risk zone 3a and at risk of coastal flooding in your assessment, yet the attached Environment Agency RAG Hazard Map from your Strategic Flood Risk Assessment shows a large proportion of this site to be in an area at low or no risk of flooding. Further analysis, as part of the site specific flood risk assessment accompanying the current planning application for the site, has further validated and refined this and identified the safe area of development which has been approved by the Environment Agency, as shown on the attached layout plan. This consists of 1.75 hectares to the north with the lower part of the site, which encroaches into the red zone, not included for development. I should be grateful if you would advise me why have you done this, as it would appear to be in error? You have erroneously considered the site as undevelopable in flood risk terms, when in actual fact, when taking the sequential approach, it is within an area of lowest flood risk both within the village of Fishtoft and in the context of the Borough as a whole. As can be seen on the wider Environment Agency hazard map, which is also attached for reference, there are no other villages to the North East of Boston that have any white areas

Officer Comment:

Land to the north of Clampgate Road and east of Burton Croft Road, Fishtoft has been submitted in eight separate formats (Fis004, Fis011, Fis026, Fis027, Fis028, Fis029, Fis030, and Fis048). The Strategic Housing Land Availability Assessment (SHLAA) identifies them all as being undevelopable, because they will have adverse environmental impacts. In particular, the concern is that the site's development would have adverse impacts upon listed buildings to their south, and upon the character and appearance of the area, by extending the village's built-up area into an area with a countryside character (with Clampgate Road and Burton Croft Road currently providing a strong and defensible boundary to the village's built-up area). The sites have not been classified as undevelopable in flood risk terms.

Turning to flood risk issues, whilst the Environment Agency's flood hazard 2115 data identifies southern parts of the land as being exposed to 'no hazard', as one moves northwards over the site, the hazard increases through 'low hazard', 'danger for some', and 'danger for most', until the northern 0.69 hectares is at 'danger for all'. Once again, however, it must be stressed that the SHLAA's classification of these various sites as undevelopable does not hinge upon flood risk issues - rather on their impacts upon listed buildings, and the area's character and appearance.

Flood risk at sites Fis022 and Fis041 is assessed as 'danger for all' and '1.0m to 2.0m'. If more detailed survey work identified that the 2115 flood depth was less than 1.6m, whilst proposals would need to be a minimum of 2 storey with Finished Floor Level (FFL) set

Officer Recommendation:

Sites Fis004, Fis011, Fis026, Fis027, Fis028, Fis029, Fis030 and Fis048 should not be taken forward as Preferred Housing Sites.

Sites Fis022 and Fis041 should not be taken forward as Preferred Housing Sites.

Site Fis046 should be taken forward as a Preferred Housing Site.

at all, including Butterwick, Old Leake and Wrangle (the other allocated Service Villages). In fact, the parts of Fishtoft village, including this site, form an island of white in a sea of red. I would, therefore, urge you to reconsider your classification of this site as, based upon flood risk, it is amongst the most sustainable and developable land and considerable weight should be given to this in your assessment, particularly given the lack of such land both locally and within the plan area as a whole. Village Boundary Fishtoft village is being reclassified as a Service Village due to its very low risk of flooding. Therefore, it follows that the strong and defensible boundary to the village's growth should be based upon flood risk rather than the arbitrary location of existing roads. Surely, it makes sense that the required new dwellings allocated under the Local Plan are on the highest ground possible. Flood risk should be of main concern when assessing the boundary extension to the village in the Local Plan, especially considering the floods in 2013. Countryside Character Naturally, any development on the edge of Fishtoft village will have an effect on countryside character. However, 70% of this site is surrounded by other properties along their boundaries. Therefore, only 30% of the site is exposed to open countryside meaning this would be more of an infill development rather than having an adverse effect on the open countryside. The 30% is also to the north east approach to the village and its development will not greatly change the area's character. It would also bring the church into the centre of the Village rather than it being on the edge of it, which the vicar commented upon favourably at the consultation event for the current application. Fis022 Fis041: The Environment Agency maps confirm that the areas in the Fis022 and Fis041 are very low lying and at high risk of flooding. The only

a minimum of 1m above ground level, there would be no requirement for the ground floor to consist of non-habitable accommodation. If, on the other hand, the 2115 flood depth was more than 1.6m, proposals would need to be a minimum of 2 storey with no ground floor habitable accommodation - in these circumstances, 3-storey dwellings would be likely. These sites appear to be unsuitable for single-storey development, and flood risk issues may dictate that three-storey dwellings would be likely. However, whilst it may be more challenging to assimilate such dwellings with their surroundings, it is not accepted that 3-storey dwellings would be inherently unsuitable in a village context. Nonetheless, although sites Fis022 and Fis041 are considered to be developable, they are not considered to be amongst the best potential housing sites in Fishtoft, and consequently are not proposed to be taken forward as Preferred Housing Sites.

At an assumed density of 20 dwellings to the hectare, site Fis046 would deliver 54 dwellings, which is broadly in scale with the 50 dwellings sought for Fishtoft. Site Fis046 is considered to be amongst the best potential housing sites in Fishtoft, and consequently is proposed to be taken forward as a Preferred Housing Site.

way of developing these areas would be to build 3 storey houses with the ground floors as uninhabitable accommodation. This would be very obtrusive and dominant on the edge of the village, and not only would the properties themselves be totally out of character, but also such development would adversely affect the character and appearance of the village of Fishtoft. Fis046: The size of this site is of concern. Your assessment shows up to 81 dwellings for the site. This would mean that this site alone would provide over 60% more dwellings than the proposed allocation of 50 dwellings for Fishtoft village for 20 years. This is without taking into account Fis040 that is currently subject to a planning application for 20 dwellings and is expected to be approved shortly. This would leave Fis046 providing nearly 300% more dwellings than the remaining allocation of 30 dwellings for the next 20 years. So as well as placing too much reliance for meeting Fishtoft's allocation upon this one site, in delivery terms, it is not anticipated that the development will start before year 9 at the earliest, therefore, even a small delay would negate your ability to meet the 5 year housing supply. I believe this site is considerably too large to be developed in Fishtoft and to be reliant upon on it in deliverability terms and that a mix, including smaller sites such as ours, would be more appropriate. Conclusion: In conclusion whether taken together or individually, there is strong evidence as to why site Fis 004 should be reassessed as developable and allocated within the Local Plan, as not only is it appropriate and sustainable in policy terms and in a rare low area of flood risk, it is also deliverable within the first 5 years of the plan period by virtue of the current well developed and advanced planning application.

ID1: 1486 comment_author: Mr G Pettitt

comment content:

Subject: Local Plan Fishtoft re: Fis004, Fis011, Fis026, Fis 027, Fis 028, Fis029, Fis030, FIS022, Fis040, Fis041, Fis046. I write with regard to the land at the north of Clampgate Road, Fishtoft (Fis004, Fis011). I am one of the owners of this site and you will be aware of the current planning application relating to this site. In this respect, I would be grateful if you would take account of my comments with regard to the following sites. Fis004, Fis011, Fis26: Flood Risk You have classified this site as being in Flood risk zone 3a and at risk of coastal flooding in your assessment, yet the attached Environment Agency RAG Hazard Map from your Strategic Flood Risk Assessment shows a large proportion of this site to be in an area at low or no risk of flooding. Further analysis, as part of the site specific flood risk assessment accompanying the current planning application for the site, has further validated and refined this and identified the safe area of development which has been approved by the Environment Agency, as shown on the attached layout plan. This consists of 1.75 hectares to the north with the lower part of the site, which encroaches into the red zone, not included for development. I should be grateful if you would advise me why have you done this, as it would appear to be in error? You have erroneously considered the site as undevelopable in flood risk terms, when in actual fact, when taking the sequential approach, it is within an area of lowest flood risk both within the village of Fishtoft and in the context of the Borough as a whole. As can be seen on the wider Environment Agency hazard map, which is also attached for reference, there are no other villages to the North East of Boston that have any white areas

Officer Comment:

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Turning to flood risk issues, whilst the Environment Agency's flood hazard 2115 data identifies southern parts of the land as being exposed to 'no hazard', as one moves northwards over the site, the hazard increases through 'low hazard', 'danger for some', and 'danger for most', until the northern 0.69 hectares is at 'danger for all'. Once again, however, it must be stressed that the SHLAA's classification of these various sites as undevelopable does not hinge upon flood risk issues - rather on their impacts upon listed buildings, and the area's character and appearance.

Flood risk at sites Fis022 and Fis041 is assessed as 'danger for all' and '1.0m to 2.0m'. If more detailed survey work identified that the 2115 flood depth was less than 1.6m, whilst proposals would need to be a minimum of 2 storey with Finished Floor Level (FFL) set

Officer Recommendation:

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at all, including Butterwick, Old Leake and Wrangle (the other allocated Service Villages). In fact, the parts of Fishtoft village, including this site, form an island of white in a sea of red. I would, therefore, urge you to reconsider your classification of this site as, based upon flood risk, it is amongst the most sustainable and developable land and considerable weight should be given to this in your assessment, particularly given the lack of such land both locally and within the plan area as a whole. Village Boundary Fishtoft village is being reclassified as a Service Village due to its very low risk of flooding. Therefore, it follows that the strong and defensible boundary to the village's growth should be based upon flood risk rather than the arbitrary location of existing roads. Surely, it makes sense that the required new dwellings allocated under the Local Plan are on the highest ground possible. Flood risk should be of main concern when assessing the boundary extension to the village in the Local Plan, especially considering the floods in 2013. Countryside Character Naturally, any development on the edge of Fishtoft village will have an effect on countryside character. However, 70% of this site is surrounded by other properties along their boundaries. Therefore, only 30% of the site is exposed to open countryside meaning this would be more of an infill development rather than having an adverse effect on the open countryside. The 30% is also to the north east approach to the village and its development will not greatly change the area's character. It would also bring the church into the centre of the Village rather than it being on the edge of it, which the vicar commented upon favourably at the consultation event for the current application. Fis022 Fis041: The Environment Agency maps confirm that the areas in the Fis022 and Fis041 are very low lying and at high risk of flooding. The only

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ID1:

1487

comment_author: Mrs R Kennedy

comment content:

Subject: Local Plan Fishtoft re: Fis004, Fis011, Fis026, Fis 027, Fis 028, Fis029, Fis030, FIS022, Fis040, Fis041, Fis046. I write with regard to the land at the north of Clampgate Road, Fishtoft (Fis004, Fis011). I am one of the owners of this site and you will be aware of the current planning application relating to this site. In this respect, I would be grateful if you would take account of my comments with regard to the following sites. Fis004, Fis011, Fis26: Flood Risk You have classified this site as being in Flood risk zone 3a and at risk of coastal flooding in your assessment, yet the attached Environment Agency RAG Hazard Map from your Strategic Flood Risk Assessment shows a large proportion of this site to be in an area at low or no risk of flooding. Further analysis, as part of the site specific flood risk assessment accompanying the current planning application for the site, has further validated and refined this and identified the safe area of development which has been approved by the Environment Agency, as shown on the attached layout plan. This consists of 1.75 hectares to the north with the lower part of the site, which encroaches into the red zone, not included for development. I should be grateful if you would advise me why have you done this, as it would appear to be in error? You have erroneously considered the site as undevelopable in flood risk terms, when in actual fact, when taking the sequential approach, it is within an area of lowest flood risk both within the village of Fishtoft and in the context of the Borough as a whole. As can be seen on the wider Environment Agency hazard map, which is also attached for reference, there are no other villages to the North East of Boston that have any white areas

Officer Comment:

Land to the north of Clampgate Road and east of Burton Croft Road, Fishtoft has been submitted in eight separate formats (Fis004, Fis011, Fis026, Fis027, Fis028, Fis029, Fis030, and Fis048). The Strategic Housing Land Availability Assessment (SHLAA) identifies them all as being undevelopable, because they will have adverse environmental impacts. In particular, the concern is that the site's development would have adverse impacts upon listed buildings to their south, and upon the character and appearance of the area, by extending the village's built-up area into an area with a countryside character (with Clampgate Road and Burton Croft Road currently providing a strong and defensible boundary to the village's built-up area). The sites have not been classified as undevelopable in flood risk terms.

Turning to flood risk issues, whilst the Environment Agency's flood hazard 2115 data identifies southern parts of the land as being exposed to 'no hazard', as one moves northwards over the site, the hazard increases through 'low hazard', 'danger for some', and 'danger for most', until the northern 0.69 hectares is at 'danger for all'. Once again, however, it must be stressed that the SHLAA's classification of these various sites as undevelopable does not hinge upon flood risk issues - rather on their impacts upon listed buildings, and the area's character and appearance.

Flood risk at sites Fis022 and Fis041 is assessed as 'danger for all' and '1.0m to 2.0m'. If more detailed survey work identified that the 2115 flood depth was less than 1.6m, whilst proposals would need to be a minimum of 2 storey with Finished Floor Level (FFL) set

Officer Recommendation:

Sites Fis004, Fis011, Fis026, Fis027, Fis028, Fis029, Fis030 and Fis048 should not be taken forward as Preferred Housing Sites.

Sites Fis022 and Fis041 should not be taken forward as Preferred Housing Sites.

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At an assumed density of 20 dwellings to the hectare, site Fis046 would deliver 54 dwellings, which is broadly in scale with the 50 dwellings sought for Fishtoft. Site Fis046 is considered to be amongst the best potential housing sites in Fishtoft, and consequently is proposed to be taken forward as a Preferred Housing Site.

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South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 1488 comment_author: Mr S Pettitt

comment content:

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ID1: 1489 comment_author: Mr P Pettitt

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ID1: 1490 comment_author: Mr M Williams

comment content:

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ID1: 1491 comment_author: Josephine Clegg

comment content:

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Officer Comment:

Land to the north of Clampgate Road and east of Burton Croft Road, Fishtoft has been submitted in eight separate formats (Fis004, Fis011, Fis026, Fis027, Fis028, Fis029, Fis030, and Fis048). The Strategic Housing Land Availability Assessment (SHLAA) identifies them all as being undevelopable, because they will have adverse environmental impacts. In particular, the concern is that the site's development would have adverse impacts upon listed buildings to their south, and upon the character and appearance of the area, by extending the village's built-up area into an area with a countryside character (with Clampgate Road and Burton Croft Road currently providing a strong and defensible boundary to the village's built-up area). The sites have not been classified as undevelopable in flood risk terms.

Turning to flood risk issues, whilst the Environment Agency's flood hazard 2115 data identifies southern parts of the land as being exposed to 'no hazard', as one moves northwards over the site, the hazard increases through 'low hazard', 'danger for some', and 'danger for most', until the northern 0.69 hectares is at 'danger for all'. Once again, however, it must be stressed that the SHLAA's classification of these various sites as undevelopable does not hinge upon flood risk issues - rather on their impacts upon listed buildings, and the area's character and appearance.

Flood risk at sites Fis022 and Fis041 is assessed as 'danger for all' and '1.0m to 2.0m'. If more detailed survey work identified that the 2115 flood depth was less than 1.6m, whilst proposals would need to be a minimum of 2 storey with Finished Floor Level (FFL) set

Officer Recommendation:

Sites Fis004, Fis011, Fis026, Fis027, Fis028, Fis029, Fis030 and Fis048 should not be taken forward as Preferred Housing Sites.

Sites Fis022 and Fis041 should not be taken forward as Preferred Housing Sites.

Site Fis046 should be taken forward as a Preferred Housing Site.

at all, including Butterwick, Old Leake and Wrangle (the other allocated Service Villages). In fact, the parts of Fishtoft village, including this site, form an island of white in a sea of red. I would, therefore, urge you to reconsider your classification of this site as, based upon flood risk, it is amongst the most sustainable and developable land and considerable weight should be given to this in your assessment, particularly given the lack of such land both locally and within the plan area as a whole. Village Boundary Fishtoft village is being reclassified as a Service Village due to its very low risk of flooding. Therefore, it follows that the strong and defensible boundary to the village's growth should be based upon flood risk rather than the arbitrary location of existing roads. Surely, it makes sense that the required new dwellings allocated under the Local Plan are on the highest ground possible. Flood risk should be of main concern when assessing the boundary extension to the village in the Local Plan, especially considering the floods in 2013. Countryside Character Naturally, any development on the edge of Fishtoft village will have an effect on countryside character. However, 70% of this site is surrounded by other properties along their boundaries. Therefore, only 30% of the site is exposed to open countryside meaning this would be more of an infill development rather than having an adverse effect on the open countryside. The 30% is also to the north east approach to the village and its development will not greatly change the area's character. It would also bring the church into the centre of the Village rather than it being on the edge of it, which the vicar commented upon favourably at the consultation event for the current application.

Fis022 Fis041: The Environment Agency maps confirm

a minimum of 1m above ground level, there would be no requirement for the ground floor to consist of non-habitable accommodation. If, on the other hand, the 2115 flood depth was more than 1.6m, proposals would need to be a minimum of 2 storey with no ground floor habitable accommodation - in these circumstances, 3-storey dwellings would be likely. These sites appear to be unsuitable for single-storey development, and flood risk issues may dictate that three-storey dwellings would be likely. However, whilst it may be more challenging to assimilate such dwellings with their surroundings, it is not accepted that 3-storey dwellings would be inherently unsuitable in a village context. Nonetheless, although sites Fis022 and Fis041 are considered to be developable, they are not considered to be amongst the best potential housing sites in Fishtoft, and consequently are not proposed to be taken forward as Preferred Housing Sites.

At an assumed density of 20 dwellings to the hectare, site Fis046 would deliver 54 dwellings, which is broadly in scale with the 50 dwellings sought for Fishtoft. Site Fis046 is considered to be amongst the best potential housing sites in Fishtoft, and consequently is proposed to be taken forward as a Preferred Housing Site.

that the areas in the Fis022 and Fis041 are very low lying and at high risk of flooding. The only way of developing these areas would be to build 3 storey houses with the ground floors as uninhabitable accommodation. This would be very obtrusive and dominant on the edge of the village, and not only would the properties themselves be totally out of character, but also such development would adversely affect the character and appearance of the village of Fishtoft.

Fis046: The size of this site is of concern. Your assessment shows up to 81 dwellings for the site. This would mean that this site alone would provide over 60% more dwellings than the proposed allocation of 50 dwellings for Fishtoft village for 20 years. This is without taking into account Fis040 that is currently subject to a planning application for 20 dwellings and is expected to be approved shortly. This would leave Fis046 providing nearly 300% more dwellings than the remaining allocation of 30 dwellings for the next 20 years. So as well as placing too much reliance for meeting Fishtoft's allocation upon this one site, in delivery terms, it is not anticipated that the development will start before year 9 at the earliest, therefore, even a small delay would negate your ability to meet the 5 year housing supply. I believe this site is considerably too large to be developed in Fishtoft and to be reliant upon on it in deliverability terms and that a mix, including smaller sites such as ours, would be more appropriate.

Conclusion: In conclusion whether taken together or individually, there is strong evidence as to why site Fis 004 should be reassessed as developable and allocated within the Local Plan, as not only is it appropriate and

sustainable in policy terms and in a rare low area of flood risk, it is also deliverable within the first 5 years of the plan period by virtue of the current well developed and advanced planning application.
