

Post\_title: **03: Crowland**

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

ID1: 109 comment\_author: Longstaffs

## comment content:

N Ward Esq and C Adams Esq- land at Crowland.

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016), and would like to support the inclusion of the site as being one of the preferred sites in Crowland. The site is within 670m of a local shop, and the Highways Authority identifies that 'services and facilities are accessible by foot, bicycle and public transport.

We agree and confirm that the site delivers positive impacts by securing meaningful infrastructure to meet the needs of future residents such as open space and school places. The Highways Authority identifies that suitable access can be achieved, and it has been identified that opening up infrastructure costs are likely to be low.

Discussions are already ongoing between the joint owners and the Planning Authority, for a deliverable scheme of housing.

Overall, on behalf of our clients, we very much support the identification of site Cro045 (including sites Cro 016 and Cro 019), as a 'Preferred housing site' on the SELP Inset Map for Crowland.

The site completes a form of development close to the market town centre, and its development for housing will be a logical infill to the development of land in the location, following which, the new housing and families will be able to further support local services.

## Officer Comment:

Support for Cro045 is welcome. The SHLAA identifies that the site is 'accessible to Crowland's existing services and facilities and is located near to Crowland's built-up area (defined settlement limit)'. It is accepted that services and facilities are accessible by foot, bicycle and public transport and a suitable site access can be achieved. Confirmation that the site could deliver meaningful infrastructure such as open space and school places to meet the needs of the development is welcome. Although the SHLAA previously identified that opening up costs were likely to be low, the updated SFRA indicates that site Cro045 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m', therefore it is likely that flood mitigation will add to the opening-up costs, which are now classified as 'moderate'. Discussion between the LPA and the owners in relation to a scheme is noted.

## Officer Recommendation:

Cro045 is not one of the more suitable housing sites in Crowland and it should not be taken forward as a Preferred Option Housing Allocation.

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

ID1: 110 comment\_author: Mr J O'Donovan

## comment content:

Cro036

I object to the identification of this site as a Preferred Housing Site. The analysis in the draft plan is inaccurate, misleading and incomplete.

a. You refer to ' 5.14 2. the site benefits from an existing mains gas and electricity supply to an uninhabitable dwelling on site, adjacent to the derelict farm buildings;' This is factually incorrect. The bungalow occupying part of the site is inhabited as I write. The only other structures area a 'Quonset' type metal hut and a corrugated metal open store. Neither has ever been inhabited to my knowledge.

b. 5.14 'development would re-use disused buildings and lead to an enhancement of the immediate setting.' 80% of the site is open field, approx 17% is an inhabited dwelling and max 3% is tin sheds. In so much as the sheds would be torn down they are hardly being re-used. The same applies to the bungalow. As for enhancement, I prefer the current hay meadow (newly mown as I write, 25/7/16) to a building site and subsequent estate.

c. In 5.15 3 'development would lead to the re-use of redundant brownfield land which with an appropriate design could enhance the local setting.' What redundant brownfield land? It's a farmer's field. Since when were fields, currently being cropped, 'brownfield' sites? The statement that that the setting would be enhanced by re-use is making far too much of a couple of old sheds which, given very little time, will soon fall under their own weight. The local setting is one of countryside, open on 3 sides, with views across fields and towards the Welland bank. It would not be enhanced at all, but would simply disappear.

## Officer Comment:

The site selection process is based upon the most up to date information available at the time of consultation. In response to the points raised: the comment 'the site benefits from an existing mains gas and electricity supply to an uninhabitable dwelling on site, adjacent to the derelict farm buildings' was submitted in response to the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016). The Crowland Housing Paper (July 2016) states that 'provision of electricity and gas to part of the site is advantageous, although an upgrade may be required to accommodate additional housing', the occupation of the property/buildings is not a matter for site selection. The comment 'development would re-use disused buildings and lead to an enhancement of the immediate setting' was submitted in response to the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016). The Crowland Housing Paper (July 2016) states that 'development would lead to the re-use of redundant brownfield land [and not the buildings] which with an appropriate design could enhance the local setting'. The site includes a residential property and other outbuildings, therefore it is appropriate to classify the site as 'partly brownfield'. If the site were developed it is inevitable that the buildings would be demolished. The site does not appear to be actively maintained, therefore it is considered that appropriate development could lead to environmental improvements. It is accepted that the current views may change through development but this is equally true of any development particularly on the edge of a settlement. The site is partly a residential property and partly agricultural land, it is not recreational open space

## Officer Recommendation:

Cro036 is one of the more suitable housing sites in Crowland and it should be taken forward as a Preferred Option Housing Allocation.

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d. 5.16 'by securing meaningful infrastructure to meet the needs of future residents such as open space and school places'. It is already open space. How do you propose to improve the open space by making it smaller? As for school spaces this hardly flows from this site alone. Lincs CC has already indicated the availability of primary school spaces and the issues with secondary schools, but they are not reliant on this site. To include them in this statement is misleading and it should be rewritten to remove the reference.

e. 5.16 'the site is partly brownfield land, adjacent to the settlement boundary which may see less greenfield land lost elsewhere'. Only a small part of this area is brownfield. The statement quoted seeks to misrepresent the case and is not supported by observation on the ground. It is factually incorrect and misleading, in a similar way to the statement referenced above. At the very least it is disingenuous, distorted and deceitful. I would even go so far as to say it is a lie.

f. Throughout the document flood risks are referred to as 'No Hazard', yet the Environment Agency has already pointed out to SHLAA that 'no hazard mapping has been undertaken for this area so classification of 'no hazard' may not be correct.' I do not therefore understand how the site can be 'sequentially preferable than seven other potential housing sites', if no work has been undertaken. The ranking (no evidence for which appears anywhere in the document) seems to be arbitrary and unsupported by scientific analysis. It is a subject of absolutely vital importance, but we are supposed to accept a mere assertion that the SHLAA view is correct. I do not accept that view and challenge it vigorously.

g. There is a complete failure in the plan to address road access and safety issues for Low Road. In 5.13

(land that offers opportunities for sport and recreation).

It is true that delivery of school places are not reliant on this Cro036 but the site has the potential to accommodate 30 dwellings; therefore it is right that the Sustainability Appraisal identifies whether such development could help provide infrastructure to mitigate impacts identified. The site contains a bungalow and stores, therefore Cro036 has rightly been classified as partly brownfield. In July 2016 no hazard mapping had been undertaken for Crowland, therefore Cro036 was classified as 'no hazard'. For clarity, the SHLAA identified that this reference may need re-visiting once the updated SFRA hazard mapping was available. However, the Environment Agency's flood zones are also used to undertake the sequential approach to flood risk. Cro036 lies in Flood Zone 2, which is sequentially preferable to all the sites in Flood Zone 3a (most of the Preferred Sites in Crowland). The flood zones data remains accurate so it is not accepted that the ranking is arbitrary and unsupported by analysis. The Highways Authority identifies that 'significant widening and upgrading of Low Road would be required along with the provision of a footway. It would be for the developer to demonstrate that this would be viable.' This approach would also apply to Cr0031. The Highways Authority identifies that there has been 'no record of injury in the last 5 years [at the Low Road/Broadway/West Bank junction], with confidence in data to the end of May 2016. The last injury accident recorded in the vicinity of this junction was in 1995' therefore it is not accepted that this junction is dangerous. It is accepted that farm vehicles use the road, although this is also true of most of the roads in Lincolnshire. The Highways Authority identifies that 'the junction visibility looks to be adequate, and that larger vehicles using the middle of the road, and not observing the speed limit is a result of

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(referencing Clout Drove site Cro031) this comment appears: 'the Highways Authority identifies that 'access from Clout Drove would require the carriageway to be widened and upgraded and the footway extended up to the site entrance. | but there appear to be ransom strips. Although it appears that a satisfactory vehicular access could be provided to this site, arrangements for other, alternative sites will be more straightforward'. Low Road is as narrow, if not more so, than Clout Drove is. It has exactly the same footpath issue and has no room for expansion without building right up to the ditch edge to the North West of the road and/or purchasing ransom strips from existing property owners along Low Road. Additionally, the junction between Low Road/Broadway/West Bank is already dangerous. Traffic is unsighted as it comes down from West Bank and larger vehicles use the middle of the road every time. Evidence of damage on the traffic island points to several collisions, most recently last week, and the junction is not capable of supporting the additional traffic flows resulting from another 30 dwellings. Heavy construction traffic would simply be impossible to bear.

h. The speed limit on Low Road is 60mph. If access to James Road is not to be supported for site Cro002 (see 5.4) I do not understand why this issue has been ignored for Low Road. i. In summary, the comments included in the plan for site Cro036 are inadequate, incomplete and self-serving. They do not accurately reflect the site or its environs, they fail to address key questions and they could easily lead to a very unsafe (in the sense of wrong because it is based on bad evidence) decision being made. Site Cro036 should be removed from the list of Preferred Housing Sites as

driver behaviour'. Should this site be taken forward, it is accepted that construction traffic will need to access the site; planning conditions are used to manage the hours of operation to minimise impact upon residents. Cro002 is adjacent to James Road; the Highways Authority advice relating to that site is to ensure that should a developer intend accessing Cro002 via James Road suitable visibility splays are designed to ensure safe, suitable access and egress on a 50mph road. Highways Authority advice for Cro036 is specific to that site and the surrounding highways network which is different to Cro002.

the authority is not in a position to justify or sustain its decision to include it.

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

ID1: 111 comment\_author: Gregory Gray Associates

## comment content:

Gregory Gray Associates are instructed to make the following representation in response to the above consultation by Wyevale Garden Centres Ltd, who have a leasehold interest in Crowland Garden Centre, Postland Road, Crowland.

Crowland Garden Centre (site CRO38) was identified as a potential housing site within the Consultation Draft of the South East Lincolnshire Local Plan 2011 “ 2036 and our letter dated 8th February 2016 confirmed that our client supported this allocation.

It is noted that the site has not been taken forward as a Preferred Housing Site, since the Council has concluded that the Sustainability Appraisal does not score site Cro038 as well as some others, in particular with only one positive (green) impact being recorded relating to housing delivery, but five negative/very negative (orange/red) impacts being recorded including access to community facilities and loss of an employment use

Our client has significant concerns about the consistency of approach adopted by the Sustainability Appraisal and therefore its appropriateness to underpin the Council's decision in identifying preferred housing sites.

Within this context, it is noted that in order to be considered 'sound' as set out in para. 182 of the NPPF, a Local Plan must (inter alia) be 'justified' and this requires it to provide the most appropriate strategy, when considered against the reasonable alternatives,

## Officer Comment:

The site selection process took account of many issues, including: the findings of the South East Lincolnshire Housing Land Availability Assessment (July 2016); 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; the rate of employment growth since 2009; land at lower risk of flooding; the Sustainability Appraisal recommendations and the South East Lincolnshire Infrastructure Delivery Plan (2016). Therefore it is not accepted that site selection was based upon the SA site appraisal alone. The SA is a strategic assessment and has considered reasonable alternatives, based on a range of evidence as identified by the SHLAA and SA. SA Objective 2: proximity to open space and health facilities is only one issue that is considered by this objective. It also assesses the likely impact a development would have upon those facilities and amenity. Although Cro038 and Cro043 have same relationship to open space and other community facilities, Cro038 could accommodate 78 dwellings therefore the adverse impact upon such facilities, if unmitigated is likely to be greater than for Cro043 (31 dwellings). Cro038 is within 1km walk of one facility, whereas Cro043 is nearer two, and Cro043 is nearer an employment site; both of which would generate a more positive score. Potential bad neighbours such as James Road and Crowland Caravans are in close proximity to Cro038, whereas Cro043 has no bad neighbours. The SA ranking reflects this. SA Objective 4: Cro043 is within the ideal walking distance of two employment sites (Harvester Way and Horseshoe Yard) however there are no employment sites within a 1km walk of Cro038,

## Officer Recommendation:

Cro038 is not one of the more suitable housing sites in Crowland and it should not be taken forward as a Preferred Option Housing Allocation.

based on proportionate evidence.

The findings of the Sustainability Appraisal have been used to reject Crowland Garden Centre as a preferred housing site however its assessment of this site is entirely inconsistent to that adopted on other sites that have been taken forward as preferred options, in particular site Cro043 the Former Warehouses, east of Crease Drove.

Under Sustainability Objective 2, Crowland Garden Centre is ranked as red (very negative). It is indicated that although it lies within 1km of an area of open space, it is over 1km to other facilities such as the Abbeyview Health Centre and the Royal British Legion Centre. Despite having the same relationship to these facilities, preferred housing site Cro043 is given a blue (neutral) ranking for the same objective even though the text assessing the two sites is identical.

Under Sustainability Objective 4, Crowland Garden Centre is given a neutral ranking (blue) whilst that of site Cro043 is positive (green) despite the fact that the text analysing these two sites is again nearly identical.

Again, in relation to Sustainability Objective 10, Crowland Garden Centre is given an orange (negative) ranking whilst that of site Cro043 is blue (neutral) despite the text of the assessment once more being identical.

Finally, it is noted that under Sustainability Objective 13, Crowland Garden Centre is given a red (very negative) rating. This appears to be based on the fact that its redevelopment would lead to the loss of existing employment and would lead to an increase in

reflected by a slight difference in the scores; positive for Cro043 and neutral for Cro038. This is made clear by the assessment. SA Objective 10: Cro038 partly lies within the Sand and Gravel Minerals Safeguarding Zone which Cro043 does not. This means that Cro038 scores negative while Cro043 scores neutral. This is made clear by the assessment. SA Objective 13: the development of Cro038 involves the loss of a commercial enterprise which is one of the criteria considered under this objective. The other is proximity to employment for future residents of the site; Cro043 is situated within 1km of two employment sites, whereas Cro038 does not. This contributes to the higher score for Cro043. Although it is accepted that a business can cease operating at any time for commercial reasons, if that site is put forward through the Local Plan process for consideration for an alternative use, the impact, positive or negative of that change of use must be considered to ensure the process is robust and sound. New residential development offers opportunities for employment but this also applies to all other sites. The SA recognises the positive impacts reuse of a brownfield could have. However the SHLAA identifies that access to Cro038 may not be as straightforward as to the Preferred Sites. Additionally the updated SFRA identifies that 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 Crowland. The SA is by nature an iterative process, updated at each stage as more evidence becomes available. The update will help finalise the site allocations, however the selection process will also take into account all the other evidence identified in point 1 above (and any changes to that). As a result it is considered that only objective 11 (flood risk) should be changed. Support for the revised settlement



traffic generation to the site. Such an assessment fails to take into consideration the ability of the land owner to make a commercial decision to cease trading at any point or the existing traffic generation associated with the current use. In this instance, even the provision of 78 units on this site is likely to lead to a net reduction in traffic generation and, as recognised in the assessment, new residential development does offer employment opportunities which should be balanced against the current level of employment at the site. On this basis it is considered that a reassessment of Crowland Garden Centre under Sustainability Objective 13 is required and that the aforementioned factors should lead to it having (at worst) an orange assessment.

The Sustainability Appraisal is intended to provide the evidence used to justify the strategy set out in the emerging Local Plan however, as set out above, its analysis is fundamentally flawed. If Crowland Garden Centre was reassessed in a manner consistent with that adopted for Preferred Housing Site Cro043, it would fare significantly better than Preferred Housing Site Cro017, being ranked more positively on 7 of the 13 criteria and not faring any worse on any of the criteria.

This would appear to be entirely consistent with a common sense assessment of the relative merits of these two sites since Crowland Garden Centre comprises a previously developed site, partially located within the existing settlement boundary which already has an impact upon the character and amenities of the area as a result of its built form and the traffic and activity generated by the existing use. This has to be viewed more favourably than an undeveloped greenfield site which is poorly located in relation to the town centre and which would extend the ribbon of

boundary is noted.

development beyond the confines of the existing boundary of the town.

Given the failures of the Sustainability Appraisal to provide a fair and balanced approach to assessing the relative merits of the proposed housing sites, our client considers that the Council's proposed housing strategy which is based on this evidence cannot be considered 'justified', thereby undermining the 'soundness' of the emerging Local Plan.

It is requested that the sustainability appraisal of our client's site be re-examined to ensure a consistency of approach with other sites within Crowland and thereafter the Preferred Housing Options reconsidered since my client remains of the belief that Crowland Garden Centre comprises a suitable housing site for allocation within the emerging Local Plan for the reasons set out in my earlier correspondence dated 8th February 2016. Failure to ensure that the strategy adopted in the Local Plan is underpinned by a valid evidence base, risks undermining the soundness of the Plan and leaving it open to future challenge.

In addition to the above comments that relate specifically to the preferred sites for development within Crowland, our client also notes that the settlement boundary has been revised in relation to their site on the proposed Inset Map No.3.

The revised boundary now includes the full extent of existing development on both the garden centre site and the neighbouring land within the settlement and replaces the previous anomalous boundary which bisected our client's site. The new boundary is logical and defensible and is supported.

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

ID1: 112 comment\_author: Mrs Andrea Cooper

comment content:

All proposed development is reasonable for housing. However, concerns on capacity at local doctors. Old A1073 - speed limit as this has become a 'rat run' with speeding cars, danger exiting junctions.

Officer Comment:

Support for preferred housing and employment sites is welcome. The CCG 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. The Local Plan will have to demonstrate how arising infrastructure needs, including from doctors will be met. This will be evidenced through the Infrastructure Delivery Plan and subsequent versions of the Local Plan. The Highways Authority advises that 'the speed limit on the A1073 is not a matter for the Local Plan.'

Officer Recommendation:

No change required.

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

ID1: 113 comment\_author: June Clark

## comment content:

Please accept this as my formal objection.

Cro013:

1. There are numerous heavy duty farm vehicles using Low Road.
2. At least 2 properties have blind exits. I have had two occasions where a huge tractor and a woman driving a black 4x4 came far too close for comfort. They were both speeding and driving without due care and attention. Had I not been cautious, there could have been accidents and serious injury, possibly death.
3. Road users speed. The National "30mph speed limit in residential areas" - Low Road " is not observed.
4. The island at the junction from Broadway into Low Road is very dangerous. Huge vehicles use most of the road with a blind corner in both directions.
5. Adding more houses will spoil the character of our quiet and beautiful surroundings.
6. Added pressure on our local surgery. Currently we have to wait 2 weeks+ to see a GP.

I do not want 2 years of building with all the mess and dust that g s with it. I have health issues which will only get worse if building d s go ahead, which I am against, and I have no intentions of becoming a prisoner in my home, unable to live my life the way I started 6 years ago. Isn't it a shame when people are happy and settled - only to be faced with a decision "someone" makes as a means to sell land and make a huge profit - at our expense.

## Officer Comment:

It is accepted that farm vehicles use the road, although this is also true of most of the roads in Lincolnshire. The Highways Authority identifies that 'significant widening and upgrading of Low Road would be required along with the provision of a footway. It would be for the developer to demonstrate that this would be viable.' This approach would also apply to Cr0031. The Highways Authority identifies that there has been 'no record of injury in the last 5 years [at the Low Road/Broadway/West Bank junction], with confidence in data to the end of May 2016. The last injury accident recorded in the vicinity of this junction was in 1995' therefore it is not accepted that this junction is dangerous. The Highways Authority identifies that 'the junction visibility looks to be adequate, and that larger vehicles using the middle of the road, and not observing the speed limit is a result of driver behaviour'. Observing the speed limit is not a Local Plan matter. The SHLAA identifies that 'the site is on the edge of the built area of Crowland on Low Road, up to the junction with Plank Drove. There is some depth development adjacent to the site and this site would therefore be in character with that development. Plank Drove provides a good boundary against further development to the west,' so it is not accepted that more development would spoil the character and surroundings. The CCG 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.

## Officer Recommendation:

Cro036 is one of the more suitable housing sites in Crowland and it should be taken forward as a Preferred Option Housing Allocation.

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

ID1: 114 comment\_author: Barton Willmore

comment content:

Cro045:

## 1.0 INTRODUCTION

1.1 These representations are submitted on behalf of part owners who are promoting land off Cloot Drove, Crowland and is promoting the site for residential development. This site is located to the north of Kemp Street/Foreman Way which was developed by Abbey Developments and to the west of Cloot Drove. The site is situated approximately 600 metres north of the town centre and is adjacent to the former St. Guthlac's County Secondary School. The site is identified in the South East Lincolnshire Strategic Housing Land Availability Assessment (SHLAA) and in the South East Lincolnshire Local Plan as site reference 'Cro045' Inset Map No 3 - Crowland (Appendix 1 - supplied by email)

1.2 These representations follow the submission of representations in support of the proposed allocation of site 'Cro045' in the previous Local Plan consultation held in January and February 2016.

[2.0 - see comments under Policy 12)

## 3.0 CROWLAND

3.1 The Draft Local Plan establishes that Crowland is a sustainable location for future growth, reflecting a continuation of the position within the adopted South Holland Local Plan 2011-2036 and the South East Lincolnshire Local Plan 2011-2036. It is an aspiration of the JSPU for Crowland to continue to be a Main Service

Officer Comment:

Support for Crowland to be a Main Service Centre based on its sustainability credentials is noted. It is accepted that the primary school in Crowland has the capacity to accommodate and potentially expand to accommodate additional pupils. It is agreed that Cro045 is not required to provide land for a secondary school. The CCG 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. It is accepted that the site is accessible by foot, bicycle and public transport. The SHLAA identifies that the site is 'accessible to Crowland's existing services and facilities and is located near to Crowland's built-up area (defined settlement limit)'. The SHLAA also identifies that the preferred site density for Crowland is 20 dwellings per hectare which is 102 dwellings rather than 125 as suggested. Provision of a mix of housing types and tenures and open space on site is welcome. Site Cro045 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m' one of the least sequentially preferable sites in Crowland. Although a flood risk management strategy has been agreed in principle, the details will need to satisfy any additional issues raised by the updated SFRA. Discussions with the IDB relating to culverting is welcome. The provision of SuDS on site is supported particularly as Anglian Water confirm that the capacity of the surface water network has major constraints. A contribution to the IDB to enhance their storage is welcome. It is accepted that the ecological value of the site is low, opportunities to secure

Officer Recommendation:

Cro045 is not one of the more suitable housing sites in Crowland and it should not be taken forward as a Preferred Option Housing Allocation.

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Centre and positively contribute to the South East Lincolnshire Vision to deliver new sustainable-designed and constructed homes. We support that Crowland should continue to be a Main Service Centre within South East Lincolnshire and we identify that residential development in part would support the existing facilities.

3.2 The South East Lincolnshire - An assessment of settlements and their sustainability credentials June 2015 states that Crowland has the following services and facilities as identified below:

Post Office - 4  
Food Store - 24  
Cashpoint - 2  
Primary School - 4  
Secondary School - Public Transport Provided  
GP - 4  
Dentist - 2  
Public House - 4  
Place of Worship - 4  
Library - 2  
Children's Play Area - 10  
Playing Field - 26  
Police Station - 1  
Fire Station - 1

Crowland also has public transport links to Peterborough City, Spalding, Skegness, Boston and Kings Lynn on a daily basis. This study concluded that Crowland had the fifth highest total score for Services and Facilities, Transport and Employment.

3.4 Given the sustainability credentials of Crowland (including the established public transport

betterment through the development process will be supported. It is agreed that landscaping will be a necessary tool to help integrate this site with the urban edge of Crowland. Opportunities to enhance permeability by sustainable transport through masterplanning is welcome. It is accepted that there are no designated or non-designated archaeological or heritage assets on site or nearby that could be adversely impacted by the development. Confirmation that the site is deliverable, early in the plan period is noted, although as the Local Plan is moving into year 7, and a planning application has yet to be submitted it is unlikely that the site could commence in year 8, it may move into year 9. The housing targets took account of many issues, including: the findings of the South East Lincolnshire Housing Land Availability Assessment (July 2016); 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; the rate of employment growth since 2009; land at lower risk of flooding; the Sustainability Appraisal recommendations and the South East Lincolnshire Infrastructure Delivery Plan (2016); therefore it is not considered to increase the target above 500 dwellings, as Crowland has areas of land at high flood risk and although there is capacity at the primary school and GP surgery, the secondary school is at capacity, both providers have indicated that this may not be the case for the plan period.

links) it is a suitable location to accommodate a significant proportion of new dwellings and enhance the sustainability of this Main Service Centre.

3.5 We note that comments were made in response to the Local Plan Draft for Public Consultation relating to the perceived lack of educational facilities within Crowland. The County Education Department has identified that there is some capacity at the existing Primary School (with potential further capacity subject to expansion). With regards to the Secondary School, the County Education Department confirms that their intentions would be to expand within their current boundaries and not require land as promoted through site Cro045.

3.6 The Clinical Commissioning Group has identified that there is capacity at the local GP surgery to accommodate additional patients. Furthermore, the site is considered a sustainable location with such services (and others) being accessible by foot, bicycle and public transport as identified by the Highways Authority.

## 4.0 LAND OFF CLOOT DROVE, CROWLAND

4.1 Abbey Developments are promoting parcel Cro045 as identified on Inset Map No 3 - Crowland (Appendix 1 - provided by email). The site is situated west of Cloot Drove, adjacent to Normanton Road and Burghley Close. This site is off Kemp Street/Foreman Way which was also an Abbey Development. The developable area is approximately 5ha excluding Public Open Space provision and has been calculated to accommodate approximately 125 units. The site is situated within walking distance to main services including

supermarket, schools, health centre and places of worship. A Site Location Plan is provided at Appendix 2.

## CAPACITY AND HOUSING

4.2 The site is capable of delivering variety in built form, tenure and affordability to suitably address in part the housing need. Furthermore, the development can provide a high quality, sustainable, resilient and socially inclusive community. The site is also capable of delivering the public open space requirements. This can offer a recreational space which would also be within the catchment area of the adjoining residential parcels. An indicative layout is provided in Appendix 3 (provided by email).

## FLOOD RISK

4.3 The site falls within Flood Zone 3a, however, surveys conclude that appropriate mitigation is possible to reduce the risk of flooding to the development and periphery residential parcels. The strategy has been discussed with the IDB and Lincolnshire County Council and the scheme has been agreed in principle. The SHLAA confirms that the site falls within Flood Zone 3a and has been confirmed by the The South East Lincolnshire Strategic Flood Risk Assessment (SFRA) as 'no hazard' in terms of flood hazard and flood depth.

4.4 As part of the flood risk mitigation measures, the North Level Internal Drainage Board (IDB) has been approached to alter their ditch to a culvert over the proposed access into the site off Cloot Drove, of which the IDB have confirmed their requirements. Furthermore, flood defence breach analysis has been undertaken and has been subject to discussions with



the Environment Agency (EA). The EA have confirmed the requirements for finished floor levels for the 1 in 100 year plus climate change which can be achieved.

4.5 The Drainage Strategy will include SuDS to reduce flood risk to the site. In addition, a contribution to the IDB will be made to extend their existing ditches which lie adjacent to the site, which will provide additional surface water storage.

## ECOLOGY, LANDSCAPE AND LAND QUALITY

4.6 An Ecological Appraisal has been undertaken and concludes that the site in its current form is of low ecological value. The development of the Site therefore provides an opportunity to enhance biodiversity value and habitat connectivity, through the incorporation of new green infrastructure, and provides an opportunity for new pedestrian connectivity between Cloot Drove and the public rights of way to the west.

4.7 Furthermore, through the incorporation of landscape structure along the northern edge of the Site, the development presents an opportunity to provide a soft, robust northern edge to the settlement of Crowland, integrating development on the Site with the existing urban edge, filtering views from the northern approach into Crowland.

4.8 Provisional mapping illustrates that land within the redline boundary is Grade 2 quality, however this will be confirmed by a detailed Agricultural Land Classification (ALC) survey which is currently being commissioned and undertaken.

4.9 The SHLAA confirms that there are no known

biodiversity designations within the locality and welcome the proposals commitment to providing an enhancement to the biodiversity within the site.

## ACCESSIBILITY

4.10 The site is situated approximately 600 metres north of the local centre and is adjacent to the former St. Guthlac's County Secondary School. As Identified above, the local centre includes a range of services and facilities. The Sustainability Appraisal for Crowland confirmed that the site is within the ideal 1km of a local convenience store (589m) which could have a positive effect upon promoting sustainable travel to Crowland's shops and local facilities. The proximity to the nearest bus stop is 670 metres. The services from this stop include a regular service to Spalding and Peterborough. The Illustrative Masterplan enhances the permeability within the site could potentially reduce the need to rely on the private vehicle and contribute to positive health and well-being in Crowland and replicate the existing car dependency patterns.

4.11 The Highways Authority have confirmed that Crowland services and facilities are accessible by foot, cycle and public transport. Furthermore, it has been confirmed that a sustainable access can be achieved off Foreman Way and Cloot Drove and this would benefit permeability and circulation.

## ARCHAEOLOGY AND HERITAGE

4.12 There are no designated or non-designated archaeological or heritage assets on the site and surrounding land is of low archaeological significance. Whilst there are not any listed buildings or a

Conservation Areas in influencing proximity there is an opportunity to explore views in and out of the site and incorporate visual links to Crowland Abbey.

## DELIVERABILITY AND IMPLEMENTATION

4.13 Abbey Developments are currently Masterplanning the site in accordance with recent surveys and assessments. Abbey Developments are committed to this development and are confident that this development parcel can be achieved within the plan period.

4.14 The SHLAA identifies that the site has a reasonable prospect of commencing in year 10 (the plan is in year 6) and completed by year 15. We concur with the prospect of early commencement and reiterate that given the pre-application material is in an advanced stage (including discussions with the Environment Agency and the Internal Drainage Board) that the proposal could commence in plan year 8. Furthermore, the application would be submitted in full detail. The South East Lincolnshire concludes that this parcel is one of the more suitable Potential Housing Sites in Crowland and the SHLAA welcomes the deliverability of this parcel.

## 5.0 CONCLUSIONS

5.1 These representations are a continuation of the representations in support of the proposed allocation for housing site Cro045 in the Draft Local Plan for Consultation. The representations relate to three issues covered by the South East Lincolnshire Local Plan 2011-2036 Preferred Site for Development: 1. Housing Requirements in South East Lincolnshire and 2.

Sustainability of Crowland (identified as a Main Service Centre) and revised Policy 12 (Distribution of New Housing) and 3. Sustainability of the site for housing. The representations refer to the South East Lincolnshire Sustainability of Settlements Study (June 2015), South East Lincolnshire Strategic Housing Land Availability Assessment - Crowland (January 2016), South East Lincolnshire Local Plan: Housing Paper - Crowland (July 2016) and other documents which the Council has published to support the Plan.

5.2 The NPPF directs local authorities to boost significantly the supply of housing and to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47).

5.3 It is considered logical to increase the overall allocation given the existing facilities and services of Crowland that this Main Service Centre. Both the County Education and the Clinical Commissioning Group have confirmed that services are not at capacity and can immediately accommodate additional custom.

5.4 Site Cro045 is capable of delivering a range of sustainably-designed and constructed homes of a high quality delivered in an early stage of the Local Plan period to meet the identified needs for Crowland in South East Lincolnshire.

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

ID1:	115	comment_author:	Woods Hardwick Planning Ltd
comment_content:	Officer Comment:	Officer Recommendation:	
On behalf of Wheatley Homes -	<p>The site selection process took account of many issues, including: the findings of the South East Lincolnshire Housing Land Availability Assessment (July 2016); South East Lincolnshire Assessment of Settlements &amp; their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; the rate of employment growth since 2009; land at lower risk of flooding; the Sustainability Appraisal recommendations and the South East Lincolnshire Infrastructure Delivery Plan (2016). Therefore it is not accepted that site selection was based upon the SHLAA alone. It is correct that the SHLAA concluded that Cro014 is considered to be unsuitable and undevelopable, so was not taken forward as a potential housing site in January 2016, or subsequently as a Preferred Housing Site in July 2016. It is accepted that the SHLAA identifies no adverse impacts upon natural, built or historic assets, no loss of existing infrastructure, and states that the site is accessible to existing facilities by a range of transport and is located near to Crowland's existing built-up area (defined settlement limit). It is accepted that one of the reasons the site was not selected as a Potential Housing Site was because the SHLAA identified Cro014 as being in close proximity to employment land, which could adversely impact upon the amenity of future residents. Planning permission has been refused for Cro014 as a consequence of proximity to employment use; SHDC Environmental Health considers that there is no certainty that the amenity of future residents would not be adversely affected should Cro014 be developed. It is accepted that various assessments have been submitted for consideration with the planning application, but the</p>	Cro014 is not one of the more suitable housing sites in Crowland and it should not be taken forward as a Preferred Option Housing Allocation.	
Cro014:			
<p>We wish to object to the fact that site Cro014 has not been included as a Preferred Site for Crowland. It would appear that this has been largely based on the conclusions reached within the 2016 Strategic Housing Land Availability Assessment (SHLAA), which deems to the site to be unsuitable and classified as undevelopable.</p> <p>The assessment of this site within the SHLAA is for the most part positive stating:</p> <ul style="list-style-type: none"> <li>- It will not have any adverse impacts upon natural, built or historic assets;</li> <li>- It will not lead to the loss of existing infrastructure such as open space, green infrastructure or community facilities;</li> <li>- It is accessible to Crowland's existing services and facilities and is located near to the existing built up area;</li> <li>- Whilst the land is allocated for employment, there is adequate land elsewhere to meet future needs;</li> <li>- Services and facilities are accessible by foot, bicycle and public transport</li> </ul> <p>The only negative comment is that the site may not be able to offer a satisfactory residential environment as the industrial uses to its west and the related traffic may impact on the amenities that would be enjoyed by new dwellings on the site. As a result the site has been deemed to be unsuitable for development.</p>			

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There is no firm evidence to substantiate this negative assessment and the use of the term 'may' shows that this is a supposition that is not based on a factual assessment. In point of fact, the site is subject of a current planning application, which is supported by a noise assessment which demonstrates that this issue is not significant and can be adequately mitigated.

Harvester Way already extends past existing residential development and this particular site will be no different. Further, the Council's Environmental Health Officer has accepted the findings of the report and has raised no objections to the development of this site for residential use.

In addition to the noise assessment a range of other technical assessments were submitted as part of the application, including an up-to-date flood risk assessment which considers the impact of existing flood defences failing. All of these reports have been considered acceptable and there are no objections to any technical aspects of the scheme. Therefore the conclusion should be that there is no reason why the site should be considered unacceptable in planning terms.

Consequently the site should be deemed suitable for development and considered as a preferred site for housing in Crowland.

South Holland Planning Committee refused planning permission for this site. The Local Plan should only allocate sites that are considered to be developable; the refusal of planning permission indicates that this is not the case, therefore it is appropriate to take forward other sites where there is a greater likelihood of planning permission being secured, thereby providing more certainty with delivery. Furthermore, the updated SFRA identifies that site Cro014 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m' one of the least sequentially preferable sites in Crowland; the Environment Agency identifies that 'the National Planning Policy Framework (para 101) says that the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding but because large areas of South East Lincolnshire are at the same probability of flooding (i.e. land having a 1 in 100 annual risk of river flooding, or a 1 in 200 annual risk of sea (tidal) flooding), more refined information has been used for the Sequential Test from the SFRA maps (i.e. the hazard maps), which show not only the probability of flooding but also the consequences of flooding, to decide which sites are sequentially preferable. Although the submission of a Flood Risk Assessment may help satisfy the Exception Test, the Exception Test cannot be applied unless the Sequential Test is passed – and the updated SFRA identifies that for site Cro014 the Sequential Test has not been passed' therefore it is not accepted that there are no reasons why the site should not be taken forward.

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

ID1:

116

comment\_author:

A D Alcock, R M Alcock, J M Alcoc

comment\_content:

We wish to lodge an objection to the proposed preferred sites for residential development in Crowland.

The Majority of the allocation is to the south of the town. Traffic from these sites will, at peak times, naturally feed into Peterborough Road pushing even more vehicles into an area which already has problems with tailbacks and delays. Any increase in these problems will not be supported by the local population. The present situation is the regular source of local complaints. the sites are also the furthest from the school and the least convenient for pupils. Walking to school is highly unlikely resulting in more car journeys.

Some particular sites are likely to cause additional problems. Cro043 will encourage traffic moving south to use Crease Drove which is highly unsuitable for additional traffic being single track. It is also an employment site on which there are commercial buildings. One of these is occupied by the highly successful local cancer group. This group has generated over £500K and donated that sum to local charities. Any proposals should provide for their continued accommodation.

Cro036 is an area where there are no footpaths , on a narrow road, and no mains drainage. It is also remote from the school resulting in more car journeys.

Site Cro031 and Cro041, in the eastern sector, should be utilised. Development in this area would encourage a more even spread of route options reducing the increased traffic problems likely to be caused by the

Officer Comment:

It is accepted that most of the Preferred Sites are in the southern half of the town, although it is difficult to determine with any certainty vehicle movements and patterns from those developments at this strategic level. Although these sites are outside the ideal 600m walking distance to a school, there are only two sites within this distance as a result of the location of the school and the built form of Crowland. The Highways Authority (in response to the planning application for Cro043) identifies that 'given the application site's permitted B2 use, its brownfield status and its close proximity to the existing development boundary of Crowland, there is not a strong case for refusing this application by reason of the residual cumulative impact of the proposed development upon transportation being expected to be severe. Accordingly, subject to inclusion of conditions the Highways Authority do not wish to object to this application.' Therefore it appears that a satisfactory access solution can be achieved, and that no objections have been raised in terms of vehicle movements arising from Cro043. The site is not identified as an employment site in the Employment Land Technical Paper 2016, and the emerging Local Plan identifies that there is sufficient employment land available to meet future needs, without its identification for that use. Therefore it would be unreasonable to require alternative provision to be identified to accommodate the current use. The Highways Authority identifies that 'significant widening and upgrading of Low Road would be required alongwith the provision of a footway. It would be for the developer to demonstrate that this would be viable.' These requirements would also apply to Cro031. Anglian Water identifies that 'sewerage

Officer Recommendation:

Cro036, Cro043 and Cro050 (part of Cro031) are some of the more suitable housing sites in Crowland and should be taken forward as Preferred Option Housing Allocations. Cro041 is not one of the more suitable housing sites in Crowland and should not be taken forward as Preferred Option Housing Allocation.

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

southern options. the area is also much more convenient for school enabling children to walk to school in safety without needing to use heavily trafficked roads, avoiding an increase in car journeys which is much more sustainable. All in all it is a much more sustainable area to develop. Cro041 is available and can be accessed independently from the east as well as benefitting from a right-of-way to Postland Road.

Incidentally, the notation on the plan for the school is totally incorrect. It has nothing to do with Holbeach Academy or a secondary school. it is now the primary school and the only school in town.

Finally, the site r/o 60 North Street has not been recorded on the latest plan as a commitment.

infrastructure and/or treatment upgrades will be required to serve the proposed growth (or a diversion of assets may be required). However this is true of all preferred housing sites. The Highways Authority has identified no concerns with the Preferred Sites in terms of highways and traffic management, individually or cumulatively. It is accepted that most of the Preferred Sites are in the southern half of the town, although it is difficult to determine with any certainty vehicle movements and patterns. It is accepted that Cro041 is in the northern part of the town, but is outside the ideal 600m walking distance to a primary school. This is equally true of the majority of the potential housing sites. The availability of Cro041 is noted. The Highways Authority identifies that 'access to Cro041 via the existing garden centre would be geometrically feasible although the culvert carrying the road over the water course would need to be investigated to see if it is suitable for adoption, otherwise a new culvert would be required. The existing separate footbridge would not be acceptable for adoption' therefore it appears that a satisfactory access solution can be achieved, although it might not be as straightforward as for the Preferred Sites. The base map for the Policies Map is provided by the Ordnance Survey and is updated at set times. However this does not affect the accuracy of the Policies Map. To help improve legibility of the Policies Map, sites that are able to accommodate up to 10 dwellings are classified as being too small to show. In this case Cro024 has planning permission so is recorded in the housing trajectory under commitments.



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

ID1: 117 comment\_author: Robert Pate

## comment content:

CRO. 036. Objection to this development. All the family's on Plank Drove off Low Road have problems with overflowing septic tanks. This is due to the high water level, sometimes after heavy rains only just below the surface. This problem will be made worse by the extra water run off from a large estate in the next field. Hygiene will be further compromised by this, we already only flush toilets every other time and cut down on showers etc at times of high water levels. Also there is the blind corners at the junction of Low Road.

## Officer Comment:

Anglian Water identifies 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)'. This should ensure that run-off is managed as close to the source as possible, so could potentially secure betterment to the existing position; It is not accepted that the development of 30 dwellings is a large estate. The Highways Authority identifies that 'significant widening and upgrading of Low Road would be required alongwith the provision of a footway. It would be for the developer to demonstrate that this would be viable.' This approach would also apply to Cro031. The Highways Authority identifies that there has been 'no record of injury in the last 5 years [at the Low Road/Broadway/West Bank junction], with confidence in data to the end of May 2016. The last injury accident recorded in the vicinity of this junction was in 1995' therefore it is not accepted that this junction is dangerous. The Highways Authority identifies that 'the junction visibility looks to be adequate, and that larger vehicles using the middle of the road, and not observing the speed limit is a result of driver behaviour'.

## Officer Recommendation:

Cro036 is one of the more suitable housing sites in Crowland and it should be taken forward as a Preferred Option Housing Allocation.

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

ID1: 118 comment\_author: C J Sharpe

## comment content:

Cro036:

This site lies adjacent to the existing settlement boundary, contains redundant farm buildings and existing dwellings within and alongside its boundaries. The development for housing would form a logical infill for the provision of new homes for the town.

The site is predominantly brownfield and considered locally as unproductive agriculturally as it comprises heavy clay upon a gravel base. We have been advised it is the most suitable land for the foundations of buildings to be found in the area and is one of the two potential sites least susceptible to flood risk.

Crowland Town Council, in their response to the initial Consultation, advised they were fully supportive for the development of five of the originally proposed sites and listed CR036 first among their list of preferences. This reflects a number of comments we have received supportive of the opportunity to enhance this part of the town which the Plan has recognised.

## Officer Comment:

The SHLAA identifies that Cro036 is 'located near to Crowland's existing built-up area (defined settlement limit)' and it is accepted that the site contains dwellings and other structures, some of which may be redundant. The SHLAA identifies that 'Plank Drove provides a good boundary against further development to the west' and therefore would 'round off' Crowland in this location. The site is partly brownfield (rather than predominantly). Information relating to soil type and ground conditions is noted. Based on the information available in July 2016 Cro036 was one of the more sequentially preferable sites, in flood risk terms because the site is within Flood Zone 2; the updated SFRA identifies that site Cro036 is within Flood Zone 2, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1m' still one of the more sequentially preferable in Crowland. Crowland Parish Council's support for the site is noted.

## Officer Recommendation:

Cro036 is one of the more suitable housing sites in Crowland and it should be taken forward as a Preferred Option Housing Allocation.

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

ID1:

119

comment\_author:

Robert Doughty Consultancy

comment\_content:

Section 3 of the current consultation document sets out the comments made regarding housing sites in Crowland and the Local Planning Authorities' response to those comments. Our comments regarding CROO18 (which were acknowledged by letter from your office on 7th March 2016) do not appear to have been taken into account. This implies that we had made no comments to the January 2016 consultation draft. We did, however, submit comments, and background papers, including noise reports and a proposed masterplan, to supplement the information already available for site CROO18. (Should you have difficulty in finding any of the documents submitted with the January 2016 representation, please do not hesitate to contact us.) The review of the SHLAA also appears to omit any reference to the background reports and the proposed increase in size of the site.

It appears, therefore, that comments submitted to a previous consultation have not been taken into account or been given due consideration. This is a procedural failure and if it is a common phenomenon, could result in the plan being found unsound. This would be an unwelcome possibility and, as such, we should be grateful if our client's previous comments, which are repeated in full below, could be given due consideration at this time.

After discussion with your office, I understand that the nature of these comments would mean that they would not be featured in this consultation and will indeed be dealt with at a later consultation. This seems reasonable, but I would be grateful, however, if

Officer Comment:

Cro018 and its supporting evidence has been given full, appropriate consideration through the Local Plan process, Cro018, the enlarged site (Cro049) and the new site Cro048 have also been assessed by the SHLAA. The Local Plan is an iterative process and the Preferred Sites consultation provides an opportunity to further assess these sites, as well as Cro036, Cro045, Cro031, Cro041 and Cro038. Representations made relating to policies are being considered separately. All representations (including for sites) for the January and July consultations, and the officer response, are expected to be taken to the South East Lincolnshire Joint Strategic Planning Committee for consideration in March 2017, providing a further opportunity for scrutiny. The location of Cro018, Cro048 and Cro049 are noted. The SHLAA identifies that for Crowland the preferred density is 20 dwellings to the hectare; Cro018 would be 44 dwellings (rather than 100), Cro048 is 71 dwellings (rather than 75) and Cro049 is 67 dwellings. The SHLAA identifies Cro018, Cro048 and Cro049 as being in close proximity to employment land. SHDC Environmental Health consider that even with mitigation there is no certainty that the amenity of future residents would not be adversely affected, which could impact upon the type and extent of development delivered in the Crease Drove employment area. This is an issue which does not affect the Preferred Sites, or the Potential Housing Sites. The Highways Authority identifies that 'Crease Drove is inadequate in terms of carriageway width, construction, absence of footways, absence of street lighting and general physical layout to serve further development. There is generally insufficient width to permit vehicles to pass one another. The additional traffic likely to be

Officer Recommendation:

Cro018, Cro048 and Cro049 are not some of the more suitable housing sites in Crowland and should not be taken forward as Preferred Option Housing Allocations.

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

you could also confirm that our client's comments, including additional comments to Policies 2,5, 6, 12, 14, 15 and sites CRO036, CRO045, CRO031, CRO041 and CRO038 (all sites identified as preferred allocations on the Crowland Inset Map) which were included on the same consultation form, are being given due consideration.

The same representations also promoted a new area of land to the east of Crease Drove, not previously considered by the SHLAA, for consideration as a housing site. This site lies between CRO12 and CRO14. The SHLAA update and the response to representation also appear to fail to acknowledge the submission of this representation, although other sites (such as CRO43, to the north of CRO012) have been added into the SHLAA assessment and taken into consideration in the current consultation document.

Our previous comments regarding to site CRO018 and the land between CRO12 and CRO014 read as follows:

The Inset Plan for Crowland identifies several potential allocations in Crowland, all to the north of the town and all in Flood Zone 3a, in advance of the Level 2 SFRA. All the allocations require infrastructure improvements.

Our client's land interests centre around Crease Drove to the south west of the town centre and all are immediately adjacent to the existing settlement boundary and adjoin existing residential areas.

The interests are effectively split in two, either side of Crease Drove and these are identified on the attached location plan and masterplan showing how the sites could be developed. Some, but not all of the land has

generated by the proposed development will result in an increased incidence of manoeuvring of passing vehicles, which will lead to vehicles overrunning the edge of the narrow carriageway and adjoining verge, thereby causing an unacceptable level of damage to both and possible structural failure of the carriageway edges. Such conditions are contrary to the interests of safety and free passage of vehicles and pedestrians within the public highway. As such, the proposal is contrary to Section 4 of the National Planning Policy Framework (2012), specifically paragraph 32. Consequently, the presumption in favour of sustainable development does not apply in this instance'; at a strategic level this is considered sufficient to inform the Local Plan site selection process.

been the subject of SHLAA representations. The northern part of that area to the north west of Crease Drove is identified as CroO18. The subject land to the south east of Crease Drove was not the subject of a SHLAA representation.

The land to the north west of Crease Drove measures 3.4 ha and is capable of accommodating approximately 100 at 30 dpha. The land to the south east of Crease Drove measures 3.5 ha and is capable of accommodating 75 dwellings which is discounted based on the need to include a noise attenuation buffer zone.

All the SHLAA proposals off Crease Drove have been discounted due to the perceived impact from Crowland Cranes and the need to improve Crease Drove. The SHLAA commentary, however, suggests that the development of Crease Drove would be unlikely to fund the necessary improvements to Harvester Way.

No assessment has been made by the Local Plan team of the actual impact of Crowland Cranes in terms of noise impact and no assessment of the necessary work to Crease Drove (Harvester Way is quite suitable) has been undertaken. <sup>2</sup>

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

ID1: 120 comment\_author: Lincolnshire County Council

comment content:

Cro046 - The County Council support the allocation of the site as landowner and will market in due course.

Officer Comment:

The owners support for the allocation is noted;

Officer Recommendation:

Cro046 is one of the more suitable housing sites in Crowland and should be taken forward as a Preferred Option Housing Allocation.

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

ID1: 121 comment\_author: Mr A Coates

## comment content:

Cro036:

Based on the information contained in the consultation I object to the identification of this site as a Preferred Housing Site. The draft plan does not sufficiently cover the following issues:

The existing road access is very narrow, with no footpath facility to the site. Consequently, from a safety and environmental perspective it is completely unsuitable for the proposed increase in traffic flow of a new development. The junction with Broadway is also not suitable for increased traffic flow.

The document does not adequately identify how the flood risk of increasing impermeable areas will be dealt with.

## Officer Comment:

The Highways Authority identifies that 'significant widening and upgrading of Low Road would be required alongwith the provision of a footway. It would be for the developer to demonstrate that this would be viable.'

The Highways Authority identifies that there has been 'no record of injury in the last 5 years [at the Low Road/Broadway/West Bank junction], with confidence in data to the end of May 2016. The last injury accident recorded in the vicinity of this junction was in 1995' therefore it is not accepted that this junction is dangerous. The Highways Authority identifies that 'the junction visibility looks to be adequate, and that larger vehicles using the middle of the road, and not observing the speed limit is a result of driver behaviour'. Should this site be taken forward, highways improvements will be required, therefore it is not accepted that it is unsuitable for the increased traffic flow. A Flood Risk Assessment would be required to be submitted with a planning application for the site. This should show how flood risk and surface water run-off will be managed and if necessary mitigated.

## Officer Recommendation:

Cro036 is one of the more suitable housing sites in Crowland and should be taken forward as a Preferred Option Housing Allocation.

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

ID1:

122

comment\_author: Savills

## comment content:

Our client is the single freehold owner of land to the east of Clout Drove, Crowland, as shown edged red on the plan attached at Appendix 1 [Appendix 1 provided on email copy of representation]. The site has been the subject of previous representations by the Postland Estate to the emerging South East Lincolnshire Local Plan and has been assigned the reference Cro031.

We conclude that our client's site should also be identified as a preferred housing site, alongside those already shown as such in the current consultation version of the Local Plan. The release of the site could be phased over the Local Plan period, and if necessary, into the plan period beyond. This would allow for a structured release of S.106 and CIL contributions to mitigate development impacts and provide requisite required improvements to infrastructure capacity.

In accordance with the Council's proposed spatial strategy and the proposed level of growth to be directed to Crowland, a number of housing allocations are proposed at Crowland. We consider the principle of proposing development at a number of sites to be sound. This approach can provide a varied and flexible supply of sites. However, it is observed that the housing sites preferred by the Council at Crowland are typically smaller sites in and around the built up area of the town and in some instances, are previously developed sites. By their nature, such sites can be more difficult to develop and this can constrain the ability to deliver housing and provide for sufficient supply in a timely way. It is noted from the Crowland Housing Paper that none of the Council's proposed allocations will

## Officer Comment:

The proposal to phase delivery of Cro031, and the provision of phased developer contributions is noted. Support for developing a number of allocations is noted. Although some of the Preferred Sites are smaller and previously developed, others are edge of settlement greenfield land. It is acknowledged that previously developed sites can be more difficult to develop, but two of those sites have planning permission subject to a s106 agreement, with the evidence indicating that the sites will come forward in a timely manner. Most sites have not contributed to housing delivery in Years 1-5 because the Local Plan is currently in Year 6 so the housing trajectory indicates when the Preferred Sites are expected to come forward in the future. The ability of Cro031 to deliver housing on an edge of town site, with access to services is noted. The SA baseline position is to assess each site without mitigation, then recommend whether on implementation benefits can be achieved. Taking this into account: SA Objective 11: the updated SFRA identifies Cro031 within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m' one of the least sequentially preferable sites in Crowland. The Environment Agency identifies that 'the National Planning Policy Framework (para 101) says that the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding but because large areas of South East Lincolnshire are at the same probability of flooding (i.e. land having a 1 in 100 annual probability of river flooding, or a 1 in 200 annual probability of sea (tidal) flooding), more refined information has been used for the Sequential Test from the SFRA maps (i.e. the hazard maps), which show not

## Officer Recommendation:

The owner indicates that the site could be phased; Cro050, a smaller site of 3.5 hectares for 70 dwellings is proposed. This would help address minerals and flood risk concerns; Cro050 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' one of the more sequentially preferable sites in Crowland, and outside the Sand and Gravel Minerals Safeguarding Zone. Cro050 is one of the more suitable housing sites in Crowland and should be taken forward as a Preferred Option Housing Allocation. Cro031 is not one of the more suitable housing sites in Crowland and should not be taken forward as a Preferred Option Housing Allocation.



contribute to supply in years 1-5 of the Plan period. It is therefore considered that the Council should identify additional housing land at Crowland to provide for delivery of some development in years 1-5 of the Plan period, in accordance with paragraph 47 of the NPPF, and indeed, through the remainder of the plan period. As such, we consider that the plan should provide for a more balanced supply of sites at the town, which can contribute to supply early in the plan period and which comprise of clearly deliverable land on the edge of the town, with good accessibility to services and facilities.

Considering the deliverability of land to the east of Clout Drove

Within the context of the above, we have considered the opportunity presented by our client's site to fulfil the requirement we have identified for the delivery of additional housing land at Crowland and early in the plan period. In doing so, we have considered the suitability, availability and achievability of development at the site in accordance with the definition of a deliverable site, as set out within the NPPF.

Suitability

The Crowland Housing Paper (July 2016) remarks that the Site Cro031 is not considered one of the more suitable potential housing sites in Crowland. In stating this, it is recognised that the Sustainability Appraisal does not score site Cro031 as well as some other sites and that in particular, no positive (green) impacts were recorded, but three very negative (red) impacts were recorded. We have carried out our own assessment of the site against the Sustainability Assessment objectives in order to provide our own assessment of

only the probability of flooding but also the consequences of flooding, to decide which sites are sequentially preferable. Although the submission of a Flood Risk Assessment and/or provision of sustainable drainage may help satisfy the Exception Test, the Exception Test cannot be applied unless the Sequential Test is passed – and the updated SFRA identifies that for site Cro031 the Sequential Test has not been passed' therefore a negative assessment is correct; SA Objective 6: it is accepted that betterment could be achieved on site, however this would depend upon the design and implementation of a proposed scheme, which the assessment reflects; SA Objective 7: support for the recommendations are noted; SA Objective 8: it is accepted that the landscape impact would be no worse than that for Cro045 therefore the score for this objective will be altered to negative; SA Objective 5: the impact of a development upon education facilities (primary and secondary) is only one issue assessed. The SA also considered the distance Cro031 is from primary and secondary schools. Without mitigation it is expected that Cro031 with a capacity of at least 168 dwellings would have a greater impact upon the primary and secondary school than for most of the other potential housing sites (by virtue of its size). The site is also outside the preferred walk of the secondary school. This is reflected in the SA score for the site; SA Objective 9: the development of this site will involve the loss of 8.4ha of agricultural land, so generates a lower score by the amount of land lost. Similarly because of the extent of the development the impact upon air and water quality and consumption is likely to be more noticeable if unmitigated. Cro031 partly lies within the Sand and Gravel Minerals Safeguarding Zone which the Preferred Sites do not which also has an adverse impact upon the ranking. Confirmation that access can be achieved via

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

the suitability of the site, as follows.

To reduce the risk of fluvial and coastal flood hazard to people, property and land in South East Lincolnshire by managing fluvial and coastal risk and adapting to climate change:

The site is the subject of no local or statutory designations, aside from the site's location within Flood Zone 3, as shown on the Environment Agency's map showing the risk of flooding from rivers and sea. Our client has commissioned a Flood Risk Assessment and this has found that the site benefits from flood defences, which protects the site to a 1:100 year or greater chance of flooding. This situation is the same for most of the Council's larger preferred sites at Crowland and consequently, our clients site can be considered to now worse than those site in flood risk terms and therefore suitable in flood risk terms. As such, we consider that the site should be assessed as having a neutral (~) impact with regard to this sustainability objective, rather than the negative (x) impact that has been assessed by the Council.

To protect, enhance and sustain green infrastructure, biodiversity and geodiversity across South East Lincolnshire:

In terms of ecology the site is the subject of no local or statutory designations. Given the current agricultural use of the site, it is considered unlikely that it would not be possible to mitigate against any impacts upon site specific ecological interest at the site. Consequently, it is considered that development of the site would be suitable in ecological terms. Given the opportunity to provide enhancements within the site, it

Normanton Road is noted. The owner also confirms that access could also be achieved via Jubilee Way. Confirmation that there are no restrictive covenants or public rights of way on site is noted. The owners willingness to make the site available for development in the short term is welcome. The SHLAA identifies Cro031 as developable. The SHLAA promotes sites in Crowland at 20 to the hectare which equates to 168 dwellings;

is considered that the site should therefore be assessed within the Sustainability Appraisal as having a positive (positive) impact, rather than the neutral (neutral) impact which has been assessed by the Council.

To conserve, enhance and promote South East Lincolnshire's distinctive urban and rural historic and built environment and cultural heritage:

In terms of heritage impacts, it is considered that development of the site would have no adverse impacts upon any heritage assets or their settings that could not be mitigated. Indeed, there are no heritage assets within the vicinity of the site. In terms of below ground heritage it is anticipated that any impacts could be mitigated without the need to preserve an interest 'in-situ'. Consequently, it is considered that development of the site would be suitable in heritage terms and consequently we agree with the Council's assessment of this site.

To protect the quality and character of landscape and townscape and seek opportunities for enhancement:

We consider the site to represent a logical opportunity for a cohesive form of development that is well related to the built-up edge of the town. Indeed, development would 'wrap-around' the existing Normanton Road / Jubilee Way estate to the south and also infill between that estate and the garden centre and caravan sales company to the east. Therefore, the site is considered to benefit from a positive physical relationship with the existing edge of the town. In terms of landscape impact beyond the site to the north, we consider there is good opportunity within the site to

mitigate landscape and visual impacts. As such, we consider that the site should be assessed as having a neutral (±/x) impact with regard to this sustainability objective, rather than the double negative (xx) impact that has been assessed by the Council. Neither therefore do we agree with the assertion in the The Crowland Housing Paper (July 2016) that the site have greater impacts in this regard than alternatives at Crowland. One such example is Cro045, which we consider would have similar, if not, worse impact.

To improve education, training and lifelong learning, improve the skills and qualifications of all and raise their aspirations:

The Sustainability Appraisal states that Crowland currently requires additional capacity for primary, secondary and post-16 provision and that additional school places will therefore be needed to meet the needs of students living in the development; contributions may be sought to help address the negative impact generated by this development. We consider that the need to provide additional capacity to accommodate development should not, in itself, be reason to assess a proposal as having a negative impact in this regard. Also, it is notable that the site benefits from good accessibility to the existing primary school. Furthermore, it is noted that the Sustainability Appraisal remarks that development on this site will generate employment during the construction period; apprenticeships or employment of local long term unemployed could help improve job prospects and prosperity for residents. As such, we consider that the site should be assessed as having a neutral (±/x) impact with regard to this sustainability objective,

rather than the double negative (xx) impact that has been assessed by the Council.

To protect and improve the quality of soil, air and water resources by encouraging their sustainable and efficient use:

We do not consider the impacts that are described within the Sustainability Appraisal are likely to be any worse or any better for this site when compared to any of the other site options at Crowland. As such, we consider that the site should be assessed as having a minor negative (x) impact with regard to this sustainability objective, rather than the double negative (xx) impact that has been assessed by the Council.

In view of the above, we conclude that the site is no less suitable than the preferred options that have been identified by the Council.

## Achievability

It is considered that there are no barriers to achieving development of the site. It is noted that the Crowland Housing Paper (July 2016) refers to the Local Highways Authority's comment that it appears that a satisfactory vehicular access could be provided to the site and we agree with this. We also note that the Council observes that there would appear to be ransom strips in terms of access into the development to the south, we can confirm that our client has reserved access rights to be able to achieve access from the Normanton Road Estate to the south. We therefore consider that development is achievable with regard to the key consideration of access. There are no restrictive

covenants which affect the site or any public rights of way which cross the site. As such we consider that development of this site would be achievable, as defined by the NPPF.

## Availability

Our client is the single freehold owner of the site. Under the terms of the current agricultural tenancy at the site, the site can be made available for development immediately. As such we consider that the site is available for development, as is defined by the NPPF.

## Deliverability

In view of the above, we conclude that the site can be considered to be deliverable. In order to identify additional housing land at Crowland to provide for delivery of some development in years 1-5 and through the remainder of the Plan period, in accordance with paragraph 47 of the NPPF, we consider that our client's site should also be identified as a preferred housing site, alongside those already shown as such in the current consultation version of the Local Plan. The release of the site could be phased over the Local Plan period, and if necessary, into the plan period beyond. This would allow for a structured release of S.106 and CIL contributions to mitigate development impacts and provide requisite required improvements to infrastructure capacity. With the total site area extending to 8.41 hectares, we consider that development of the site could deliver in the region of 150 dwellings over the course of the lifetime of the development.

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ID1: 123 comment\_author: Environment Agency

## comment content:

Cro017, Cro045:

We are disappointed to note that the number of dwellings to be allocated to this settlement has increased from 380 to 500 as Crowland is at a high risk of flooding from the River Welland and associated washlands.

The following comments are based on the draft outputs of the updated Strategic Flood Risk Assessment, which have not yet been ratified. However, we would recommend that you use this data to review your Sequential Test evidence for the site allocations.

All the sites proposed for allocation will require site specific assessments to demonstrate that they can mitigate against the predicted flood depths shown on the latest hazard mapping, in order to pass the NPPF Exception Test.

Cro017 and Cro045 lie within an area classified as 'danger for all' where potential flood depths of 1-2m are predicted within the draft Strategic Flood Risk Assessment's hazard mapping. It is important that the site promoter acknowledges the level, and additional costs, of flood mitigation that will be required to make the dwellings safe (i.e. confirms that the NPPF Exception Test can be passed, through built in resistance measures to mitigate against the appropriate breach scenario with allowances for climate change for the lifetime of the development). Confirmation that the

## Officer Comment:

It was considered appropriate to increase the housing target for Crowland from 380 to 500 dwellings (although this includes 193 completions and commitments) to create a sustainable form of development in the town that is capable of supporting infrastructure and services over the plan period, and to meet market demand. Where data was available the sites selected were the most sequentially preferable in flood risk terms in Crowland. The updated SFRA will help inform the final site selection. A site specific FRA will be sought as part of the planning application process to ensure that the Exceptions Test is passed. The updated SFRA confirms the draft outputs for Cro017 and Cro045. Should these sites be taken forward confirmation will be sought from the promoters to ensure that flood mitigation can be secured as part of a viable scheme. It is acknowledged that this may have an impact upon the design of development, but without a detailed design for consideration it is difficult to assess the impacts until planning application stage. At that point each site would be judged on its merits.

## Officer Recommendation:

No change required to housing target. Cro017 and Cro045 are not some of the more suitable housing sites in Crowland and should not be taken forward as Preferred Option Housing Allocations.

sites will still be viable, and therefore deliverable, when these additional costs are taken into account should be sought from landowners/developers. Such mitigation can also impact on the final design of the houses, i.e. raising the height due to finished floor level requirements and sometimes needing to be 3 storey with no ground floor habitable rooms - such requirements often fall into conflict with other planning policies and you need to be confident that sites can incorporate the required mitigation, and still be acceptable on other planning grounds.

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ID1: 124 comment\_author: Longstaffs

comment content:

Site south of A16-

We write on behalf of our above named client.

We have studied the South East Lincolnshire Local Plan - Public Consultation on Preferred sites for development (July 2016).

We have written previously to suggest the site south of the A16, between Carrington Drove and Barbers Drove South would be a suitable site for Roadside services (letter/Proforma of 19/12/14 to Simon Eldred, and email of 11 March 2016 to Karen Johnson)

We appreciate the recently published Inset Maps deal primarily with Housing, but we do note that there has been an annotated area for Employment use at Crowland , and we see no reference to any comment about that site or the site we have previously put forward.

We take this opportunity to re-advise of the suitability of our clients site, as a site for roadside services, and we would be appreciative of your consideration of this.

Cro032:

We note that that the above site has not been proposed as a 'Preferred housing site'.

We have re-considered this site, and appreciating your comments about proximity to the A16, we put forward that the site should be considered for

Officer Comment:

LCC have not identified demand for this type of facility and as such suggest that there is no need for a specific policy or designation for this type of use. It is considered that the Local Plan policies would provide sufficient scope to enable a proposal to be positively considered on its merits. In general, the Highways Authority supports the provision of roadside services as such facilities offer the travelling public opportunity to take a break in their journey for rest and/or refreshment with the obvious benefits to safety. If the site at Crowland between James Road and the A16, is to be promoted access should be off James Road (the old A1073) rather than off the A16. There is a roundabout at the junction of the A16 with James Road. However there is a local perception of excessive traffic congestion at the James Road/Peterborough Road junction and some local opposition might therefore be expected.

Officer Recommendation:

No change required.

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commercial/Industrial /Employment uses, or in alternative, forming a site for roadside services.

ID1:	125	comment_author:	Anglian Water
comment_content:	<div>Officer Comment:</div> <div>Officer Recommendation:</div>		
All of the proposed housing allocations in this area are expected to require improvements to the existing water supply and foul sewerage networks to enable development to come forward on these sites. Please refer to the enclosed spreadsheet [received via email] for detailed comments relating to these sites.		The Local Plan will have to demonstrate how arising water and sewerage 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. The site specific matters identified by Anglian Water will help inform the site selection process and the anticipated delivery rate for preferred sites.	No change required.

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ID1: 126 comment\_author: Mr Martin Simpson

## comment content:

Cro036:

Is the gas main and electricity delivered to this area large enough to cope with the new development, or will this need improving?

Already the water pressure is very low on Plank Drove. How will this affect us as residents when the new houses are built, as above will this need improving. As anyone knows who drives to work the Peterborough Road has been up 4 times in the last month and this is a 2 lane road , not like ours which is single track most parts. On such a small road the disturbance and upheaval will be considerable to us living here.

Also there is no main sewer at this point in the road, what would be the proposal for waste/ sewerage.

There is also no footpath for this area and very poor lighting. There will be a very large increase in traffic, which concerns us. What would be your proposal to remedy this?

This is the only way into Plank Drove for us as residents and employees of the working farm. If the road is to need major alterations how will this affect the day to day running of the farm, our lives and our children's safety. Have you considered the heavy machinery that uses the road and the size/weight of the vehicles.

The junction of Low Road / Broadway can be dangerous

## Officer Comment:

Western Power and the National Grid have identified no site specific concerns with providing gas and electricity to this site, although it is accepted that the networks may need to be upgraded to cope with additional demand. However this is true of all preferred housing sites. Anglian Water identifies that 'sewerage infrastructure and/or treatment upgrades will be required to serve the proposed growth (or a diversion of assets may be required). Anglian Water identifies 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)'. This should ensure that run-off is managed as close to the source as possible, so could potentially secure betterment to the existing position. The Highways Authority identifies that 'significant widening and upgrading of Low Road would be required alongwith the provision of a footway. It would be for the developer to demonstrate that this would be viable.' So it is inevitable that there would be some disruption to the day to day operation of Low Road. However the Highways Authority carefully manage roadworks to ensure that minimal disruption is generated for residents and local businesses. The Highways Authority identifies that there has been 'no record of injury in the last 5 years [at the Low Road/Broadway/West Bank junction], with confidence in data to the end of May 2016. The last injury accident recorded in the vicinity of this junction was in 1995' therefore it is not accepted that this junction is dangerous. It is accepted that farm vehicles use the road, although this is also true of most of the roads in Lincolnshire. The Highways Authority identifies that 'the junction visibility looks to be

## Officer Recommendation:

Cro036 is one of the more suitable housing sites in Crowland and should be taken forward as a Preferred Option Housing Allocation.

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with speeding cars and poor visibility also as only 1 car can pass at a time, but 2 cars can pull out of Low Road at the same time. in different directions.

The National speed limit on the road is 60 . We already have too many fast cars driving down our road and do not want this to increase.

CRO015 , CRO032, CRO013, CRO033, 18, 21, 41, 38 . Can all be developed without major impact on the people who live nearby we would appreciate you to consider these first before you turn our road area upside down.

We have already had a major development done and 1 pending in the last year; please consider the true cost before you make a decision.

adequate, and that larger vehicles using the middle of the road, and not observing the speed limit is a result of driver behaviour'. Should this site be taken forward, it is accepted that construction traffic will need to access the site; planning conditions are used to manage the hours of operation to minimise impact upon residents., The SHLAA identifies that sites Cro015, Cro032, Cro033 and Cro018 are undevelopable therefore are unsuitable housing allocations. Site Cro013 has planning permission for residential development, and sites Cro038 and Cro041 have been discounted because they are considered to be less suitable than the Preferred Sites.

ID1:	127	comment_author:	Historic England
comment_content:	Employment -  Historic England's previous comments in respect of the Thorney Road, Crowland site have not been included in the paper, and there is no reference to the site itself in the paper other than at the end where it is cited as a preferred site to be taken forward.  The current iteration of the SA d s not address the issues raised by Historic England on the Crowland site in previous comments of 17 February 2016.	Officer Comment:	CR007 has been assessed by the Council's Conservation Officer, who agreed with the comments previously made in the SA published in January 2016. On this basis Historic England's comments were considered, however, the comments remained unchanged. The comments relating to Thorney Road were not included in the Employment Paper (July 2016) because they related to the SA; it was considered that these comments would be better addressed in the SA Report, however for clarity 'the site and surrounding area is not known to have any significant historic or culturally-significant features.'
		Officer Recommendation:	CR007 Thorney Road is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation.

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

ID1: 128 comment\_author: iba planning

## comment content:

On behalf of the owner of land at Crease Drove:

The land has previously been submitted for consideration as a housing site as part of South Holland District Council's earlier SHLAA (site reference Cro012) and, more recently, was the subject of specific representations earlier this year in response to the January 2016 consultation on the Draft South East Lincolnshire Local Plan.

A copy of those last representations [provided via email] is enclosed for completeness and to ensure continuity, since many of my client's original objections remain unresolved.

## Formal Representations

Whilst the increased number of houses (confirmed as a 'minimum') for Crowland and its retention as a 'Main Service Centre' are welcomed and supported, as is the inclusion of site Cro043 as a housing site, my client still has residual concerns regarding the way the draft Plan has so far been prepared and the consequences this will have on the overall test of soundness when independently examined.

The need for greater transparency  
In section 6 of the Housing Paper for Crowland, stakeholders are told that three new sites were put forward for consideration as Potential Housing Sites.

Of these, two (sites Cro043 and Cro046) have been identified for inclusion as housing sites in the

## Officer Comment:

Receipt of the January representations is confirmed. Support for identification of Crowland as a Main Service Centre and for the increased housing target is noted. Support for Cro043 is noted. Cro012 has been given full, appropriate consideration through the Local Plan process, and has undergone the same SHLAA assessment as all the other sites. Cro012 had been submitted for consideration as a housing site before the January 2016 consultation so was assessed by and included in the SHLAA in January 2016 (which was also available for comment). It was classified as undevelopable in that report. Although a representation was submitted this did not warrant a change in approach therefore the site was not classified as 'new'. Cro046 and Cro047 were new sites to the process and Cro043 was being re-assessed because new evidence had been submitted which changed the approach taken to that site. Therefore it was correct that Cro012 was not referred to. However, the Local Plan is an iterative process and the Preferred Sites consultation provides an opportunity to further assess Cro012, as well as all the other sites, particularly as the SHLAA was available for comment alongside the Preferred Sites documentation. All representations (including for sites), and the officer response, are expected to be taken to the South East Lincolnshire Joint Strategic Planning Committee for consideration in March 2017, providing a further opportunity for scrutiny. The LPA were aware through pre-application discussions for Cro043 (which were ongoing through the preparation of the Preferred Sites document) that a satisfactory access solution could be achieved, which did not involve highways improvements to Crease Drove. However, the formal response to the

## Officer Recommendation:

Cro012 is not one of the more suitable housing sites in Crowland and should not be taken forward as a Preferred Option Housing Allocation. Cro043 is one of the more suitable housing sites in Crowland and should be taken forward as a Preferred Option Housing Allocation.

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Publication Draft.

My client is concerned that her site (Cro012) has not been referred to in this section, despite the fact that the site was also raised as a potential housing site during the previous consultation (as was site Cro043), and its undoubted similarities with site Cro043.

In originally discounting site Cro012 in the SHLAA, the proximity to nearby employment uses and concerns over noise were cited, as was the need to upgrade Crease Drove which might raise issues of viability.

The above however were also the very same issues leading to the identical (unfavourable) SHLAA conclusions for site Cro043.

First, there would appear to be no distinction between the promotion of either site thus far to warrant one being regarded as a 'new site' for consideration, and the other not to be mentioned at all. Both were submitted as part of the SHLAA process (both being discounted for the same reasons) - and neither being proposed as a housing site as part of the January consultation draft.

Stakeholders can only comment on what is in front of them. The omission of site Cro012 has denied stakeholders the opportunity to comment on this site and, whether inadvertently or not, placed other less suitable sites at an unfair advantage.

Second, in now proposing Cro043 as a housing site, the consultation document records that the concerns (in the SHLAA) over proximity to employment land and noise can be satisfactorily mitigated.

planning application was received too late for inclusion in the Crowland Housing Paper. The Highways Authority identifies for the outline planning application for Cro043 that 'given the application site's permitted B2 use, its brownfield status and its close proximity to the existing development boundary of Crowland, there is not a strong case for refusing this application by reason of the residual cumulative impact of the proposed development upon transportation being expected to be severe. Accordingly, subject to inclusion of conditions the Highways Authority do not wish to object to this application'. But in relation to the outline planning application for Cro012 the Highways Authority identifies that 'Crease Drove is inadequate in terms of carriageway width, construction, absence of footways, absence of street lighting and general physical layout to serve further development. There is generally insufficient width to permit vehicles to pass one another. The additional traffic likely to be generated by the proposed development will result in an increased incidence of manoeuvring of passing vehicles, which will lead to vehicles overrunning the edge of the narrow carriageway and adjoining verge, thereby causing an unacceptable level of damage to both and possible structural failure of the carriageway edges. Such conditions are contrary to the interests of safety and free passage of vehicles and pedestrians within the public highway. As such, the proposal is contrary to Policy SG15 of the South Holland Local Plan (2006) and Section 4 of the National Planning Policy Framework (2012), specifically paragraph 32. Consequently, the presumption in favour of sustainable development does not apply in this instance', so it is considered that there is a material difference in highways issues between the two sites. In relation to amenity concerns: Cro012 is approximately 45m from the boundary of Crease Drove

There is however no mention of the need for, and/or viability of, the highway improvements along Crease Drove - presumably because this could also easily be mitigated? If so, this ought to have been recorded for transparency as was the case with the Environmental Health issues.

Third, there are no material differences between sites Cro043 and Cro012 (they adjoin each other!) such as to warrant the resolution of the employment, noise and highway issues on one, but not the other.

Indeed, both sites are currently the subject of (separate) outline applications for residential development before the Council<sup>2</sup> and both necessarily comprise supporting surveys/reports confirming the absence of any noise, amenity or highways constraints.

The above being the case, the same employment, noise and highway concerns should have similarly been dropped in respect of Cro012 and the site reassessed in the light of this new information.

Site Cro012 ought, in the circumstances, to have been included within the same section on new sites<sup>2</sup> warranting further consideration/consultation in the light of this new information.

It was not and this raises significant concerns over the transparency of the site selection process.

To remedy the above, further consultation on site Cro012 is required either in advance, or as part, of the Publication Draft.

Business Park, whereas Cro043 is approximately 125m from the business park, therefore it is reasonable to consider that noise and amenity issues are more likely to be experienced by Cro012 than Cro043. Following consideration of all available information SHDC Environmental Health consider that 'even with mitigation there is no certainty that the amenity of future residents on Cro012 would not be adversely affected, which could impact upon the type and extent of development delivered in the Crease Drove employment area'. This is an issue which was not raised in relation to Cro043 at planning application stage by Environmental Health, and does not affect the other Preferred Sites, or the Potential Housing Sites. Both sites have been taken through the same Local Plan process, and the same planning application process (which involved separate consultation); specialist officers have considered the outline applications for both sites and recommended that Cro043 should be granted permission (subject to a s106 agreement) whereas Cro012 should not. This view was upheld by Planning Committee. The Local Plan should only identify sites that are considered to be deliverable; the refusal of planning permission for Cro012 indicates that this site would not be deliverable therefore cannot be taken forward in the Local Plan. The updated SFRA identifies Crowland as a high flood risk area, therefore it would be inappropriate to promote more housing growth than is currently identified. The SHLAA recognises that Cro012 'is located near to Crowland's existing built-up area (defined settlement limit)'. There is no requirement for the developers of Cro043 to contribute towards highways improvements along Crease Drove. No evidence has been submitted to demonstrate that the owners of Cro012 have reached agreement with the owners of any potential sites in the Crease Drove area in relation to

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If, once the updated SFRA becomes available, there is no justification for the relatively high levels of growth in some of the less sustainable settlements, the increased housing can then be redirected to Crowland as one of the Main Service Centres.

Whether in response to the need for more housing in Crowland as a result of the updated SFRA, or more generally, site Cro012 is again highly commended to you as a logical extension of the existing settlement boundary and/or enabling site Cro043 to be developed more efficiently.

In combination with site Cro043 (and possibly others along Crease Drove), site Cro012 will assist in providing the means to collectively contribute towards any highway works necessary along Crease Drove.

In addition to the above, it is also known that adjoining landowners along Crease Drove have also promoted their land for consideration as housing sites. Again, there is no mention of these sites under the new sites section of the consultation draft - further casting doubt over the transparency of the site selection process.

Nor is there any acknowledgement of those sites (including Cro043 and Cro012) that are the subject of current planning applications for residential development before the Council.

Not only are these applications indicative of willing and able landowners who have clearly been prepared to invest significantly in bringing these sites forward for early delivery/development<sup>3</sup> but they also necessarily provide the Council (and those preparing the new Local

delivering a comprehensive development in this location, or that collectively these sites are able to contribute to improving Crease Drove. The sites in the Crease Drove area were considered by the SHLAA to be undevelopable therefore were discounted before the January 2016. Although further evidence may have been submitted in relation to some of these sites, and additional sites submitted, none suggests that the approach taken to each site of the area was inappropriate, therefore none of the sites warranted being re-introduced. Although a planning application can demonstrate availability of a site, it does not necessarily mean that more information is available relating to suitability or that the sites are likely to be developed early, particularly if an outline planning application has been submitted. Investment in a site through the planning application process is at the landowners/developers risk.



Plan) with much more information/evidence attesting to the suitability of these sites for housing.

At present, stakeholders have no confidence that those preparing the Local Plan have been made aware of any of these sites having been submitted for planning, or the wealth of supporting documentation that is consequently available on them.

In the above connection, a copy of the location plan, illustrative site layout plan and supporting documentation is enclosed for site Cro012 [provided by email] showing how it is intended to be developed and confirming the absence of any physical or technical constraints that might otherwise prevent, limit or delay the early delivery of this site for housing.

In the absence of the above amendments, my client's objection to the draft South East Lincolnshire Local Plan will remain on the basis that, for the above reasons (and those cited previously), the Plan cannot be considered to have been prepared positively, is neither justified nor effective, and does not comply with national planning policy - thereby collectively failing to meet the tests of soundness.

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