

Post\_title: **07: Long Sutton**

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

ID1: 168 comment\_author: Dave Bax

## comment content:

I live in John Swains Way, Long Sutton. This area has a green space situated on John Swains Way. The Green Space has a public foot path which connects Lime Walk to Daniels Gate/John Swains Way.

I am not against future development, but must point out South Holland District Council is happy to build more properties and therefore receive greater Council Tax. The Addition of 560 houses will increase their coffers by nearly £600,000.00 a year.

What South Holland District Council are not good at is delivering services against this income. Local people will only see the collection of rubbish, and a few bin bags every 6 months as the value of their Council Tax Contributions.

The Green Space at the front of my property and the footpath, only seem to be maintained by the previous house builder, with South Holland DC failing to take control of the maintenance, namely grass cutting, rubbish and litter removal, lighting, a proper footpath.

The new developments in Lime Walk, will have access to the public foot path that is no more than a muddy track in the winter and a poorly maintained public footpath during the summer months (Over grown). Pedestrians who use this walk from the Lime Walk to Daniels Gate mainly do so to get to the Peel School area. Pedestrians walk straight across the park, wearing a natural footpath (Not the actual Foot Path) across this green space.

## Officer Comment:

SHDC does not own the open space; it is still in the ownership of the developer, who has responsibility for maintenance. Whether new open space is to be provided on Los008 or whether a financial contribution may be sought in lieu of on site provision to improve existing open space will be a matter for a planning application. The LPA can only seek developer contributions for infrastructure and works necessary to make the development acceptable in planning terms; so any open space or improvements to existing open space must be directly related to the development and be fairly and reasonably related in scale and kind to the development. In general, SHDC does not adopt new open space or take responsibility for future maintenance; this would need to be addressed through an open space management plan submitted with a planning application;

## Officer Recommendation:

No change required.

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The Green space only has lighting running at the front of John Swains Way.

If 78 Houses are to be added to Lime Walk it is obvious that foot traffic across this green space will increase. South Holland DC have got to take responsibility for the public space, which should include the provision of a Tarmac footpath running from the new development across the green space, Strategic Street Lighting on the new path, new litter bins on the park and the foot path, new signage and applied grass cutting regime.

South Holland DC should insist that any new developer should provide the path, the lighting the bins, the signage, the drainage, the litter bins. Once in place South Holland DC should take over maintenance of the path, the lights, the bins and the grass cutting regime (Instead of leaving it to others while accepting the increased revenue).

The John Swains Way Estate was built in 2002 and since then South Holland DC has taken no interest in the Green Space, No interest in littering or dog fouling, No interest other than to accept the Council Tax revenues of the estate leaving the original developer to cut the grass.

Having a plan is about planning properly, and at this early stage considering the impact to what is at present a poorly maintained, muddy (or overgrown) footpath, there must be account taken to improve the infrastructure supporting this new development.

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ID1:

169

comment\_author:

Peter Smeaton (Moor Solar Ltd)

comment\_content:

Re South East Lincs Local Plan " Preferred Sites for Development" Consultation The former Butterfly & Wildlife Park SHLAA Ref Los 037 Response No 20

I am writing on behalf of the land owners in response to the request put forward by Members in the South East Lincolnshire Local Plan : Housing Paper Long Sutton (July 2016) to have the above referenced site designated as being "outside the emerging settlement boundary for Long Sutton". At the time of writing the minutes of that Members meeting have not yet been produced and so I am unable to comment on either the concerns raised or their relevance to this consultation process.

I will however put on record that it would be totally inappropriate for Members, some of whom were leading objectors to the original planning application, to try and influence the outcome of this consultation for personal motive or gain.

I have a number of points that I would like to bring to the attention of the Joint Strategic Planning Committee that might be helpful in determining whether this site should be included within the Long Sutton Settlement Boundary.

I would refer you first of all to the Settlement Boundaries Background Paper that outlines the approach to settlement boundaries to be included in the Local Plan. Clause 3.5 b) ii states that the settlement boundary encloses  
" sites with planning permission for development

Officer Comment:

The minutes of the Committee meeting are available at [www.selincsllocalplan.org](http://www.selincsllocalplan.org) Members based their decision to exclude part of the site from the settlement boundary to protect the landscape setting of the town. Los037 has planning permission therefore it is correctly identified as a Housing Commitment. The role of the Countryside designation in the emerging Local Plan is to apply a policy of overall 'development restraint' with appropriate exceptions. Accordingly, it is not intended to encourage intensification of the built environment in this part of Long Sutton for the purposes of providing market residential development. Therefore the proposed settlement boundary is considered to be appropriate. Although a wide range of planning matters relating to Los037 were discussed by South Holland Planning Committee at the time the planning application was considered, the Local Plan provides a Members an opportunity to consider some matters again. Given the lack of progress made in terms of delivery, Committee considered the Local Plan an appropriate tool to seek to protect the landscape character of that part of Long Sutton, should the current permission lapse. It is accepted that the SHLAA identifies the site as developable within years 6-10 of the Local Plan period. Discussions relating to commencement and pre-commencement conditions are noted. It is accepted that development of the site will make good use of a vacant and underused brownfield site. Overall the Sustainability Appraisal scores sites Los037 with three positive (green) impacts being recorded for housing delivery, soil, air and water quality and access to employment, although a further seven (blue) impacts could deliver positive impacts by contributing towards infrastructure to meet

Officer Recommendation:

Los037 is one of the more suitable housing sites in Holbeach and should be taken forward as a Housing Commitment.

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situated on the edge of the main built up area"

the needs of future residents such as open space and school places.

The site in question has current planning consent (Ref H11 -0398-12) for some eighty seven homes and is situated on the edge of the main built up area and is also borders the grounds of Peele School.

The second piece of supporting documentation I would ask the Committee to consider is the updated Strategic House and Land Availability Assessment. This confirmed the site is available, achievable and suitable for development. It goes on to confirm

" Planning Permission is outstanding and there is a reasonable prospect that it will soon be developed ( assumed to begin in year 6 and be completed before year 10)."

SHDC Planning officers have been apprised of the current position re commencement works and are currently engaged with the developer in satisfying the Pre Commencement Conditions. These actions would suggest the site will be developed out in the short term and so therefore it would be appropriate for it to be enclosed within the Settlement Boundary.

The third piece of supporting documentation I would ask the Committee to consider is the revised Policy No 2 Spatial Strategy and Policy 12 Distribution of New Housing. In particular I would bring to the Committee's attention your own Strategic Environment Assessment / Sustainability Appraisal that has been carried out for the site and is included in the draft Local Plan.

The Appraisal confirms 'the site has the potential to contribute towards the 580 dwellings proposed

for Long Sutton over the plan period'. It goes on to state 'the site is partly within and adjacent to the Long Sutton settlement boundary and therefore be consistent with the principles of the hierarchy'. It continues with 'if the type and affordability of housing to be constructed on this site can help deliver the housing need identified for Long Sutton and South East Lincolnshire it will have a positive impact on this objective'.

Besides confirmation that the site is already partly within the existing settlement boundary the Appraisal goes on to state 'The site is a disused wildlife park. As such the site is brownfield land, containing evidence of its former use' and furthermore 'the redevelopment is likely to have a positive impact on residential amenity.' One of the Appraisal's final conclusions is that development on this site 'may reduce the amount of greenfield land that is developed elsewhere.'

In conclusion this site benefits from an existing planning consent for 87 houses, it lies partly within the existing settlement boundary and has been classified by Officers as being brownfield. For these reasons I would ask the Joint Strategic Planning Committee to review the supporting evidence and recommend that the site remains within the emerging Settlement Boundary for Long Sutton as originally proposed.

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

ID1:	170	comment_author:	Mr Dale Frith
comment_content:	Have considerations been given regarding drainage, water table, sewage etc?	Officer Comment:	Officer Recommendation:
		Anglian Water has commented that the Water Recycling Centre has capacity to serve all the sites. The foul sewerage network would require upgrading for all of the sites. Anglian Water has commented that water resources are adequate to serve the proposed growth. However the supply network would require upgrading to accommodate all of the sites. Anglian Water has commented that the capacity of the surface water network has major constraints, and that all developments should seek to reduce flood risk and incorporate Sustainable Drainage Systems (SuDS). The Local Plan will have to demonstrate how arising infrastructure needs, including water supply, sewerage and drainage, will be met. This will be evidenced through the Infrastructure Delivery Plan and subsequent versions of the Local Plan;	Further work will be undertaken in the IDP to incorporate Anglian Water's concerns.

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ID1:	171	comment_author:	Lincolnshire Wildlife Trust
comment_content:	The Shrubberies is a Local Nature Reserve and we would query why it is no longer shown as LNR but just recreational open space. We would recommend that the site is shown as LNR and not recreational open space. As a Lincolnshire Wildlife Trust nature reserve we do not feel it is appropriate to categorise the site as recreational open space and we would therefore request that this site is shown only as a LNR.	Officer Comment:	Officer Recommendation:
		Accepted.	Change the Policies Map to show The Shrubberies as a LNR and not a recreational open space.

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

ID1: 172 comment\_author: G R Merchant

## comment content:

Site Los043

The application to the latest Local Plan consultation reiterates that the land owner continues to make his garage site and attached land available for a comprehensive residential redevelopment on the fringe of Long Sutton. The proposal is a request by the owner of Hillards Motors, Bridge Road, Long Sutton who is proposing to retire in the near future but has been unable to sell the business as a going concern. The total ownership of the site is as shown on the attached plans. The Hillard Motor business is included within the proposed development boundary for Long Sutton, the remainder of the land is not included but includes a small landscaped pond and grassed paddock which has become surplus to requirements. The paddock area is predominantly accessed from Bridge Road apart from a small gated access off the B1359 to the South. The owner of the site wishes to develop the garage site for residential use which would 'land-lock' the paddock land. A comprehensive scheme could be created with Bridge Road frontage with access to the rear land for various dwelling types, affordable housing units, bungalow units, quality properties making use of the pond, together with possibly a single dwelling off the Southern access. This response to the Local Plan consultation is that the owner of the land shown on the attached plans is making the land available for development as a 'windfall' site to help to satisfy the future housing needs for South Holland.

## Officer Comment:

Confirmation that Los043 is available is noted. The SHLAA identifies that 'the site is partly within and partly adjacent to Long Sutton's existing built-up area (defined settlement limit). The Highways Authority identifies that 'safe and suitable vehicular and pedestrian access off Bridge Road would be easily achievable – the frontage currently provides access to car sales and a residential property. There should be no access to this site from Wisbech Road.' Therefore it appears that a satisfactory and suitable access solution can be achieved to the whole site, although it seems that access to the paddock could not be achieved separately. The SHLAA identifies that 'part of the site is currently in use (though not allocated) as employment land – and its development would therefore potentially lead to the loss of employment land. However the Employment land Technical Paper (January 2016) does not seek the site's allocation, and this land is not of a strategic scale – the loss of approximately 0.3ha of employment land is unlikely to have adverse impacts'. While it is noted that the site has been marketed unsuccessfully for employment use, the loss of employment land does not appear to be a significant concern. Whether a comprehensive scheme could be created for this site would be a matter for the planning application process, although a southern access would not be supported. At this stage, the Preferred Sites provide sufficient land to deliver the housing requirement for Long Sutton so there is no need for additional 'windfall' development to satisfy housing needs.

## Officer Recommendation:

Los043 is not one of the more suitable housing sites in Long Sutton and should not be taken forward as a Preferred Option Housing Allocation.



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

ID1: 173 comment\_author: Heather James

## comment content:

I am writing to make some comments about the plan for more housing to be built in Long Sutton.

Whilst I fully understand the need for such development I am concerned about the choice of various sites.

I often use Seagate Road and I feel that the lane is too narrow to support such a development. Further, access to and from this site near to the bridge will cause congestion. Coming over the bridge from the centre of Long Sutton is a blind spot. To meet a stationary vehicle waiting to enter this site is dangerous and could have disastrous consequences.

The Gedney Road site seems to be a much more sensible proposition. Having previously been the A17 main road, it has been proven to accept larger amounts of traffic than it currently accommodates. There is already in place street lighting, a bus stop and even a cycle lane. Safe access to the A17 is already available at the roundabout. New houses here would bring a new focus and a little extra life to the northwest of this lovely market town. I wonder why this site has been overlooked?

## Officer Comment:

The Highways Authority identifies that 'Los015 should be developed with a comprehensive road layout with access onto both Seagate Road and Wisbech Road. The eastern boundary of Los015 (where the bridge is) has a long frontage onto Wisbech Road so a junction with the prescribed visibility splays should be capable of being provided along that frontage'. It is accepted that street lighting exists along Gedney Road, but new lighting would be provided should Los015 be taken forward. There is no cycle lane along Gedney Road. It is accepted that bus stops are closer to Ged001, although two bus stops are within 200m of Los015. It is not accepted that Ged001 has better access to the A17; the A17 roundabout is 440m from the site boundary. But the Environment Agency identifies that Ged001 is within Flood Zone 3a, and the majority of the site is within flood hazard in 2115 'danger for most', and flood depth in 2115 '1-2m', whereas Los015 is within Flood Zone 3a, and the majority of the site is within flood hazard in 2115 'danger for most', and flood depth in 2115 '0.25-0.5m'. Therefore Ged001 is one of the least sequentially preferable sites in terms of flood risk in Long Sutton, so consistent with national policy has been discounted.

## Officer Recommendation:

Los015 is one of the more suitable housing sites in Long Sutton and should be taken forward as a Preferred Option Housing Allocation. Ged001 is not one of the more suitable housing sites in Long Sutton and should not be taken forward as a Preferred Option Housing Allocation.

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

ID1: 174 comment\_author: Geoffrey Collings & Co.

## comment content:

We have previously put forward for consideration as a Preferred Site for housing the area denominated LoS019, LoS020, LoS006 and LoS009. The 3 reasons why these adjoining sites were not taken forward as a Preferred Housing Site are stated below

Reason No. 1. Overall the Sustainability Appraisal scores the site with two positive (green) impacts being recorded for housing delivery and access to employment, but scores three negative (orange) impacts relating to education facilities, soil, air and water quality and flood risk;

Reason No. 2. The Highways authority identifies that the access solution may not be as straightforward for these sites, as for others, which could impact upon viability and deliverability;

Reason No.3. The majority of the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m', although site LoS009 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '1.0-2.0m', one of the least sequentially preferable sites in Long Sutton

In terms of reason number 1, the negative (orange) impacts of education facilities, soil, air and water quality must surely also apply to the Preferred Sites in Long Sutton.

The negative impact relating to flood risk is addressed

## Officer Comment:

It is accepted that the negative impact identified in the SA relating to air, soil and water quality applies to the majority of greenfield Preferred Sites, although the impact upon education facilities depends on distance from schools and the likely number of school places expected to be generated by each development, so the outcome will vary by site. 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 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 Site Allocations Flood Risk Sequential Test Interim Report (July 2016) identifies that for site Los019 and Los020 the Sequential Test has not been passed'. Even with a reduced site area Los019 and Los020 has more land within a higher hazard and depth of flood risk (33.4% of Los019 with a flood depth in 2115 of above 1m, and 32.8% of Los020 with a flood depth in 2115 of above 1m, when compared to 1.4% for Los015, 7% for Los008, 3.9% for Los046 and 22.1% for Los026) therefore would remain sequentially less preferable than the Preferred Sites, in flood risk terms. It is accepted that Los019 and

## Officer Recommendation:

Los019, Los020, Los006, Los009 are not some of the more suitable housing sites in Long Sutton and should not be taken forward as a Preferred Option Housing Allocation.

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at Appendix 1 [provided by email] by way of a Flood Risk Assessment.

The Assessment concludes that LoS019, LoS020, LoS006 and LoS009 would be at a no greater risk of flooding in 2115 as compared to the Preferred Sites LoS008 and LoS026 and the recent Anfield Road development. Furthermore the risk of flooding at LoS019, LoS020, LoS006 and LoS009 would be only marginally greater than Preferred Site D which is LoS046 (0.75-1.25m as compared to 0.75-1.00m). As such, we suggest other considerations should come into play.

For example, LoS019 and part of LoS020 (see below under Proposals) would be closer to the Town Centre shops and businesses, the Primary School, the Health Centre and the library. As compared to the Preferred Sites. Access onto the A17 would also be closer and/or safer (e.g. Via a roundabout as compared to a staggered junction on a speed-unrestricted section of the A17 - LoS015 and LoS030). There is also the prospect of creating a significant area of additional open space and/or additional school places through the planning process. In short, development at this location would bring sustainability benefits.

In Terms of reason number 2, our advice contained in an e-mail dated 13 April 2016 (copy attached at Appendix 2 - [provided by email]) appears not to have been considered. The inclusion of 57 Station Road would provide an overall frontage to Station Road of about 37 metres excluding the frontage of LoS006 (see below). A frontage to Station Road of about 37 metres, together with the IDB drain on the frontage is more than sufficient to overcome any concerns the Highways

part of LoS020 are closer to the town centre, when compared to the Preferred Sites, although the Preferred Sites are closer to the secondary school and employment opportunities. The distance from LoS019/LoS020 to the A17 is broadly similar to LoS015, a Preferred Site. LoS019 and LoS020 does offer the opportunity to create open space and school places through the planning process, but this is equally true of other Preferred Sites in Long Sutton. The Highways Authority identifies that 'a plan drawing, based upon survey detail, showing that the required visibility splays could be provided within the land that is available would be welcomed' so further consideration of the details would be required to secure a satisfactory access solution. Overall the Preferred Sites could deliver 307 dwellings, which together with the 96 completions and 160 commitments should deliver the 560 dwellings housing requirement in Long Sutton. Therefore, there is no anticipated shortfall identified for Long Sutton for the plan period. It is accepted that a 7ha site will deliver 140 dwellings at 20 dwellings to the hectare. Confirmation that the owner is willing to make more land available for further development and/or open space at a later date is noted. There is no evidence to suggest that a site of 140 dwellings would be more marketable than a site of 356 dwellings. Although it appears that a satisfactory access solution could be achieved through further discussion with the Highways Authority, the Site Allocations Flood Risk Sequential Test Interim Report (July 2016) identifies that sites LoS019 and LoS020 have not passed the Sequential Test. Although the classification categories for LoS019 and LoS020 are the same as the Preferred Sites, the amount of land at higher risk within LoS019 and LoS020 is greater than for each of the Preferred Sites. Therefore, it is recommended that the site is not taken forward as a

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Authority has regarding access and visibility splays, etc. Appendix 3 comprises of an e-mail dated 05/08/16 on behalf of the co-owners of 57 Station Road, Long Sutton with confirmation of the inclusion of 57 Station Road.

Housing Allocation.☐

In Terms of reason number 3, as already stated, the question of flood risk is addressed at Appendix 1 by way of a Flood Risk Assessment.

LoS019, LoS020, LoS006 and LoS009 also offers the ability to deliver positive (blue) impacts.

## Proposal

We now wish to put forward a fundamental change to Housing Site LoS019, LoS020, LoS006 and LoS009.

To meet the anticipated shortfall in the Housing Allocation for Long Sutton, we propose that a new site is designated a Preferred Housing Site. The new site to comprise LoS019 and part of LoS020 incorporating 57 Station Road, but excluding LoS006, LoS009 and the balance of LoS020 [map showing the site has been submitted by email].

The proposed new Housing Site is shown on the plan at Appendix 4 [provided by email] and comprises approximately 7Ha/17.25 acres subject to a measured survey. The area will accommodate about 140 dwellings at a density of 20 dph. The owner is willing to provide additional land for further residential development at a later date and/or for the creation a additional Open Space, School Places, etc. A Development Site suitable for the provision of about 140 dwellings would be much more acceptable to the

market than a site for say 356 dwellings as originally proposed, with a greater prospect of achievability.

We hereby request that LoS019 and part of LoS020 incorporating 57 Station Road is brought forward as a Preferred Site for development in addition to those sites already designated in Long Sutton as Preferred Sites.

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ID1: 175 comment\_author: Geoffrey Collings & Co.

## comment content:

We wish to comment on the provision of Employment Allocations in Long Sutton.

The inclusion of 9.3Ha identified as LoS007 on Inset Map No. 7 (Long Sutton) as a proposed Main Employment Area (Policy 7) is welcome. However, we remain concerned end-users find the location constrained. The general location has been identified for Employment Use since December 1987 (see attached extract from the Long Sutton and Sutton Bridge Local Plan Adopted December 1987 - [provided by email]).

It will be noted at paragraph 3.22 of the 1987 Local Plan that at the time, the Council said 'if this area (8Ha) is to be developed it is likely to create a scale of traffic generation which should not be encouraged to use the existing road systems through Long Sutton or Sutton Bridge'. This is precisely what could happen if LoS007 is developed. There is a weight restriction on a short section of road in the centre of Long Sutton comprising Market Street. However, HGV's travelling west from LoS007 are able to travel into the centre of Long Sutton and through the Market Place (B1390) or down Bull Lane to the A17. There is no restriction for HGV's through the centre of Sutton Bridge. It is worth revisiting the Employment Land Technical Paper 2016 with particular reference to the area comprising LoS002. Note the comment regarding the junction between B1359 and Bridge Road. 'Problematic for large HGV's'.

We remain of the opinion a site needs to be identified

## Officer Comment:

Support for LO007 is welcome, although the site area is 4.8ha, and not 9.3ha. LO007 is also about half the size of the site identified in 1987. The Highways Authority have raised no objection to the level of traffic that could be generated from development of this site on the wider road network. The reference in the ELTP relating to the junction between the B1359 and Bridge Road was taken from the Employment Land Review 2012. The Local Highways Authority identifies that 'there is an existing Bus Stop at this site's northern frontage to Bridge Road – but it is not impossible to re-site this if necessary. The site's northern frontage looks to be wide enough to accommodate a suitable access and there is suitable visibility in both directions. Bridge Road is the old A17 so is of a suitable standard to be able to accommodate the vehicular activity associated with a B1 B2 and B8 use on this site.' LO007 is considered to be an appropriate sized site capable of accommodating a range of business needs. A smaller site would constrict growth in this area and may make delivery of associated infrastructure e.g. flood mitigation, drainage unviable. It is reasonable for this site to be developed in phases as demand exists. The 1998 Local Plan identified the broad area to the south of Princes as being appropriate for development but acknowledged that it would require highways improvements. It is considered that this is one of the reasons the site has not been developed. Since 1998 national planning policy has changed; for sites to be allocated in a Local Plan they should be suitable, available and deliverable. It is considered that this site is not deliverable; the Highways Authority identifies that 'the site to the south of Princes could be developed as an extension to the existing factory but there is a 7.5

## Officer Recommendation:

LO009 Bridge Road is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation. LO011 Land to the east of Hundreds Lane is not one of the more suitable employment sites in South Holland and should not be taken forward as a Preferred Option Main Employment Allocation.

with ready access to the A17. A smaller site is much more likely to be acceptable to developers/end-users and much more likely to deliver new employment uses.

We have previously recommended land located off Vicarage Lane and adjacent to the McDonalds Restaurant as suitable for the creation of a small business park. The land has previously had permission for a Hotel and/or Garden Centre. We do not act for the owner, but it seems to us the land would be relatively inexpensive to open-up in terms of infrastructure. The land has previously been rejected as suitable for an Employment Use because of its position relative to the town centre and residential areas. In our opinion a pragmatic approach to location is required. To give an example, a major employer in Long Sutton will be the Education Authority. How many employees at the primary school and the Peele Community College will cycle or walk to work. Possibly none! On the other hand the proximity of this land to the A17 will attract end-users.

Little progress has been made in the provision of Employment Land in Long Sutton since the publication of the Long Sutton and Sutton Bridge Local Plan in 1987. As things stand we could be in the same position in 29 years time. Unfortunately the writer will not be here to say 'I told you so'!

tonne maximum weight limit on Hundreds Lane to the south of the existing access to the food processing site. If access were to be formed at the frontage to Hundreds Lane, some substantial improvement works would be required on Hundreds Lane.' The cost of the highways improvements identified by the HA and especially the suggestion of an additional arm and associated road onto the existing roundabout would require significant investment to open-up the site. It is considered that employment development could not support this, and with no other funding identified (for example in the GLLEP'S Strategic Economic Plan), that this site would not be developed, so would be contrary to national guidance.

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ID1: 176 comment\_author: Fran Blinco

## comment content:

Regarding any changes to existing plan, all plots were tested against the same algorithm and those selected were deemed to be appropriate to meet building targets. Any changes to the published plans would require further public awareness and consultation. If the council is considering a Plan B it could be in the public domain . Please publish dates when final plan will be taken forward and available for inspection.

## Officer Comment:

The Publication Draft Local Plan, including site allocations, will be subject to a formal 6 week consultation to ensure that all interested parties and residents have the opportunity to comment on its content, including site allocations. The consultation will be publicised in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the South East Lincolnshire Statement of Community Involvement 2012. This will include details of the consultation period, where the Local Plan and supporting documents will be available for inspection and the process to be followed to submit comments.

## Officer Recommendation:

No change required.



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

ID1: 177 comment\_author: Lincolnshire County Council

## comment content:

Los006 - This site has the potential to open up all surrounding sites through the potential access to Station Road. Allowing this site to come forward would ensure that Long Sutton remains a sustainable place to live, with the ability to provide housing in line with Greater Lincolnshire aspirations. While there is flood risk on the site, this could be mitigated through appropriate SUDS schemes.

## Officer Comment:

The SHLAA identifies that 'the site is one of four that provide a suitable combined site that has development on three sides...consequently the combined site is considered suitable'. Therefore it appears that Los006 would not be considered appropriate as a stand-alone site. 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 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 Site Allocations Flood Risk Sequential Test Interim Report (July 2016) identifies that for site Los006 the Sequential Test has not been passed'.

## Officer Recommendation:

Los006 is not one of the more suitable housing sites in Long Sutton and should not be taken forward as a Preferred Option Housing Allocation.

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ID1:	178	comment_author:	Environment Agency		
comment_content:	<p>We are pleased to see a reduction in the number of dwellings to be allocated in Long Sutton as this settlement is at a high risk of flooding from the tidal River Nene. Sites allocated in this settlement will need to demonstrate that they pass the flood risk Sequential Test and that the depths of flooding identified in the Strategic Flood Risk Assessment can be mitigated through design in order to pass the Exception Test. It is important that those promoting these sites acknowledge the level, and additional costs, of flood mitigation that will be required to make the dwellings safe. Confirmation that the sites will still be viable, and therefore deliverable, when these additional costs are taken into account should be sought from landowners/developers.</p>	Officer Comment:	<p>Support from the Environment Agency for the reduction in housing numbers in Long Sutton (as a settlement at high risk of flooding) is welcome. The South East Lincolnshire Site Allocations and Flood Risk Sequential Test Interim Report (July 2016) identifies that the preferred sites are the most sequentially preferable sites in terms of flood risk in Long Sutton. Further work will be undertaken with the promoters of allocations to ensure that they are aware of the likely flood mitigation measures (in section 4.3) and likely associated costs to ensure that flood risk does not hinder deliverability;</p>	Officer Recommendation:	<p>No change required to site selection. Further work will be undertaken with the promoters of allocations to ensure than mitigation can be delivered as part of a viable scheme.</p>
ID1:	179	comment_author:	Anglian Water		
comment_content:	<p>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. Similarly a number of the proposed housing allocation sites are expected to require improvements to the existing water supply network. Please refer to the enclosed spreadsheet [received via email] for detailed comments relating to these sites.</p>	Officer Comment:	<p>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.</p>	Officer Recommendation:	<p>No change required to site selection. Further work will be undertaken in the IDP to ensure Anglian Water's concerns are identified.</p>

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ID1: 180 comment\_author: Larkfleet Homes

## comment content:

Former Butterfly and Wildlife Park  
As you are aware we now have a formal interest in the former Butterfly and Wildlife Park at Long Sutton.

We note that whilst the site is still identified as being a 'Housing Commitment' the settlement boundary has been altered compared to the earlier version of the draft plan published in January and now shows the site mostly outside the revised settlement limit as opposed to being wholly within it.

Notwithstanding the fact that the site has planning permission for residential development this site should score significantly better than the sites identified as a 'Preferred Housing Site' by virtue of the site being previously developed. This site has long been accepted as meeting the definition of brownfield as it is a disused wildlife park falling within Class DZ of the Use Classes Order. That fact alone should ensure its inclusion within the settlement limits.

In addition the Butterfly Park application was accompanied by a comprehensive suite of supporting documentation including reports on ecology, transport, flood risk, archaeology etc. These were all validated during the processing of the application and all confirmed that the site was deliverable. Again this demonstrates that the site should be included within the settlement limits as it is clearly a site suitable

## Officer Comment:

Los037 has planning permission therefore it is correctly identified as a Housing Commitment, rather than a Preferred Housing Site. It is accepted that development of the site will make good use of a vacant and underused brownfield site, although this is only one factor to take into consideration when defining a settlement boundary. The planning permission has now been implemented therefore it is right that the site is now incorporated within the settlement boundary, consistent with the criteria set out in the Settlement Boundaries Background Paper 2016. It is accepted that the SHLAA identifies the site as developable within years 6-10 of the Local Plan period. Discussions relating to commencement and pre-commencement conditions are noted. Further discussions with the Council in relation to the delivery of the site, and subsequent presentations to Members through the pre-application process are welcome and noted. Submission of a revised planning application to ensure delivery of a viable scheme is also noted. The SHLAA identifies that the site is 'accessible to Long Sutton's existing facilities and services and is located adjacent to the existing built up area (defined settlement limit)', Los037 is adjacent to the Peele Secondary School and leisure centre and is within 1km of the town centre, so it is accepted that Los037 relates well to the town. A revised planning application has yet to be submitted for the site, so it is not accepted that the housing trajectory should be amended to include the proposed higher figure. The housing trajectory should be based on either: the number of dwellings consented (for sites with planning permission), or, for allocations, by reference to the assumptions in the SHLAA which indicate a preferred site density of 20

## Officer Recommendation:

Los037 is one of the more suitable housing sites in Long Sutton and should be taken forward as a Housing Commitment. Amend the settlement boundary to include Los037.

for development.

In the absence of a planning permission, the site is clearly suitable for development, particularly compared to those sites identified as being preferred housing sites, as the Butterfly site is brownfield in nature and having been fully assessed in terms of flood risk, access, ecology etc., it clearly demonstrates that it can be delivered. Therefore, it should be also identified as both a 'Preferred Housing Site' as well as 'Housing Commitment'. As such it should be located within the settlement boundary. Not to do so is clearly contrary to the JPU's own criteria for defining settlement boundaries which are:

For the Sub-Regional Centres, Main Service Centres, Minor Service Centres and

Other Service Centres and Settlements, each settlement boundary has been defined having regard to the following guidelines:

- a) The settlement boundary encloses the main built-up area (or areas, in the case of a few settlements) of the town or village.
- b) The settlement boundary also encloses:
  - i. areas of amenity and/or recreational open space, the appearance and character and/or use of which is worthy of protection; and
  - ii. sites with planning permission for development situated on the edge of the main built-up area.

Notwithstanding the comments raised by Members and the public about the existing

dwelling to the hectare for Long Sutton. For Los037 that would equate to 125 dwellings, and not 151. It should be noted that the housing targets for each settlement are minimum figures so there is scope to exceed this figure should there be good planning reasons to do so.

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planning permissions (H11-0398-12 8. H11-0450-14) and the sites suitability for development, all these matters were considered by Members at the time when the Council had a 6 year land supply and despite this, chose to grant planning permission. We therefore find it hard to understand why now they now consider this brownfield site to be an unsuitable location for development which even the CPRE support.

In respect of the delay in delivery of this site, we have explained to Members that the scheme as approved will be very costly to implement due to the design of the buildings and that in our detailed assessment, having many years selling homes in the area, the resulting homes would not be attractive to the market and would not sell at a price that would make the scheme viable. In locations closer to Cambridge for example, such an exemplar development would have had little difficulty in selling. In Long Sutton the housing market is somewhat different.

It is for that reason why the site has not been delivered. We have carried out extensive work looking into how we could deliver the approved scheme and despite our expertise in providing high quality energy efficient homes utilising renewable energy throughout the area, we concluded that a more traditional scheme would be required. To this end we have made a presentation to Members of the Pre-application Consultation Group on the 14th July of a revised scheme (see attached) [revised

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scheme provided via email]. This provides 151 homes ranging from 1-5 beds and will provide ample areas of public open space including an orchard in excess of the Council's standards.

Following the presentation to Members, we are revising the proposed application and its supporting documents to take account of Member's comments and suggestions. That application will be submitted within the next few weeks.

We are of the view that despite the scheme no longer being an 'exemplar development', the scheme should be supported as it is located close to the school and relates well to the village and will make use of an underused and vacant brownfield site to provide much needed housing.

Not allocating this site will likely put pressure on other greenfield sites surrounding Long Sunon.

We therefore strongly urge you to reconsider the unsupportable decision to exclude this site from the settlement limits and put it back to within the settlements limits as originally assessed by officers using the adopted criteria and to recognise it's many benefits and also identify it as a 'Preferred Housing Site'. In addition we suggest that you amend the housing trajectory in respect of Long Sutton to include the higher figure of 151 for this site and that this will largely be provided within the first five years of the Plan.

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ID1: 181 comment\_author: Mr M Dickinson

## comment content:

Having attended the second public consultation at Long Sutton Market House I wish to reiterate the following points.

My comments are specific to the proposed development site between the Wisbech Road and Seagate Road, Long Sutton.

1) My prime concern was and still is the immediate proximity of the site to one of the lowest points in Long Sutton (Adjacent to the Spar shop at the junction of Seagate Road with the old A17), which even now floods during periods of heavy rainfall. The main sewage system runs down the centre of Seagate Road to this low point. It services domestic and retail properties in Seagate Road, Lancaster Drive and The Terrace. The development of a natural, free draining twenty-two acre field into a housing estate introducing large areas of tarmac roads, driveways and roof areas, non of which are natural free draining can only increase the likelihood of flood risk to the area and properties I have referred to. This risk will be further aggravated by the plan to raise the level of the proposed site by at least 1.5 metres as a flood preventative measure protecting the properties on the proposed development. This, by implication acknowledges the fact that the proposed site itself is at flood risk and as a consequence will increase even more the risk to existing properties on Seagate Road, Lancaster Drive and the Terrace which are considerably below this level.

These, relatively simple observations must have been apparent to yourself Mr Udy and members of your

## Officer Comment:

Anglian Water identifies that the foul sewerage network would need upgrading to accommodate the site, but that is equally true of all preferred sites in Long Sutton. Anglian Water also identifies that sustainable drainage systems should be required for all sites in the Plan Area. Given the size of the site a drainage strategy is likely to be required as part of the planning application which should demonstrate how surface water will be managed on site so that the risk off site will not be increased. The Environment Agency identifies that all the site is within Flood Zone 3a, and the majority of the site is within flood hazard in 2115 'danger for most', and flood depth in 2115 '0.25-0.5m', therefore it is one of the most sequentially preferable sites in terms of flood risk in Long Sutton. A Flood Risk Assessment will be required to ensure that through development the risk on and off site, up and downstream will be no worse as a consequence of development, this is likely to include mitigation measures identified by the Environment Agency in the Long Sutton Housing Paper (July 2016). The Highways Authority identifies that 'Seagate Road is wide enough for two vehicles to pass.' The County Council are the Local Highways Authority, and (as set out in national legislation), manage and maintain roads within Lincolnshire (excluding major trunk roads which are the responsibility of Highways England), and promote safe and sustainable travel. In addition they consider, and provide advice, on the impact that development may have on the highway. Therefore it is entirely appropriate that the Local Highways Authority advice is sought on the local road network and traffic conditions, and that weight is given to their views. The Local Plan will have to demonstrate how arising

## Officer Recommendation:

No change required to site selection. Further work will be undertaken in the IDP to ensure the impact upon doctors and schools and likely mitigation identified. Los015 is one of the more suitable housing sites in Long Sutton and should be taken forward as a Preferred Option Housing Allocation.

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Development / Planning Team when visiting the proposed site between Wisbech Road and Seagate Road Long Sutton, if indeed such a site visit did in fact take place by yourself or your team ? If not I strongly recommend you do so before proceeding with this proposed development.

2) It is also proposed access to the site will be via Wisbech Road and Seagate Road. Seagate Road is a country lane boarded by a dyke on one side. It is not wide enough for two medium sized vehicles to pass without one vehicle mounting the grass verge. at risk of entering the dyke. Upon making this point to your representative at the Long Sutton consultation I was informed that this was a matter for Lincolnshire Highways and not the responsibility of South Holland District Council, adding, "There has to be a very serious reason for Lincolnshire Highways not to approve access to a road from such a development."

This again, underlines the complete lack of understanding of vehicle movements, the local road network and conditions. Of greater concern is the apparent readiness of South Holland District Council to devoid itself of all responsibility for this particular issue to another body.

3) Long Sutton Primary School is at maximum pupil capacity, as is the the patient capacity at Long Sutton Medical Centre , both aspects having being made very clear at your public consultations but little acknowledgement appears to have been made of these issues.

3) I was dismayed and shocked by the response of members of your team during the second public

infrastructure needs, including for education and health, will be met. This will be evidenced through the Infrastructure Delivery Plan and subsequent versions of the Local Plan. It is true that should Los015 be taken forward, a lack of developer interest would prevent development. Concerns raised during the consultation periods have been given full consideration. A robust evidence-based site selection process, followed by several consultations with key stakeholders, interested parties and residents has been essential to ensure that all issues have been identified and addressed. Some potential housing sites (some with developer interest) identified in Long Sutton in January 2016 are no longer being pursued as a result of consultation feedback, similarly the amount of dwellings to be provided for in Long Sutton has been reduced to help address residents concerns. It is therefore not accepted that comments made are of no consequence. The Long Sutton Housing Paper (July 2016) identifies that the density figures are an estimate; it is acknowledged that developers may submit plans at a higher density than those identified in the SHLAA. However, planning applications can be refused should the density be considered to be too high and out of scale with the character of the area. It is an appropriate part of the development process for developers to have an interest in a site(s), for options to be taken on land and for discussions to take place through the pre-application process relating to the development of a site. This does not mean that those sites will automatically be identified as preferred sites. Indeed several sites that have developer interest have not been identified as preferred sites. The Council is not aware of any developer interest in this site, and it is not accepted that the Council has been in collusion with any developer. Through the SHLAA process a call for sites was undertaken for assessment for housing,



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consultation at Long Sutton Market House in answer to my question, "What if anything would prevent this development from proceeding?" The response being, "The only thing that would prevent this development going ahead would be if a Developer did not purchase the land." This calls into question your whole process of consultation and suggests that comments and legitimate concerns raised by the general public are of little or no consequence when, as the Councils' representative repeatedly referred to pressure from Central Government to build more houses. To the extent that although the proposed development is for 215 properties based on the Councils formula, it is highly likely that a Developer would resubmit plans to the Council to increase the number of properties to be built, as has happened with other developments in Long Sutton which your records will clearly show, approval for which must be granted by the Council and, according to your representative permission to increase the number of properties built would most likely be granted by the Council, again referring to the pressure being brought to bear by Central Government. I challenged your representative that the consultation process was not fit for purpose as a Developer was already showing interest and the Council's collusion at this consultation stage, with a Developer, was highly inappropriate. The response being that when a site is being proposed for development it is usual for the Council to seek potential Developer's interest prior to or during the consultation period.

In conclusion the proposed development on land between the Wisbech Road and Seagate Road, Long Sutton should not proceed as your consultation process is flawed on several points, is not fit for purpose and is open to legal challenge.

employment or retail use. However the Council does not actively seek developer interest in a site, although developer interest is noted as an indication of deliverability. This is an appropriate tool to help prepare a Local Plan.☐

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ID1: 182 comment\_author: Mrs F Smith (GLNP)

comment\_content:

The Shrubberies is a Local Nature Reserve and is identified as recreational open space. This is private land and it would be appropriate to check this designation with the land owner before confirming this designation.

Officer Comment:

Accepted.

Officer Recommendation:

Change the Policies Map to show The Shrubberies as a LNR and not a recreational open space.