

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

Post_title: 13: Butterwick

ID1: 236 **comment_author:** Jacqueline Barton

comment_content:

I believe the preferred sites are welcome, this expansion to the east of the village remains within the village footprint. I am however, concerned about the businesses in But002, surely it is important to maintain business sites within the village and if possible expand them.

Officer Comment:

The support for sites But004 and But020 is welcomed.

Site But002 is currently in use (and is allocated in the adopted Boston Borough Local Plan (April 1999)) as employment land. However, the Employment Land Technical Paper (Aug 2015) concludes that the site is not of a strategic scale, that its loss would be unlikely to have adverse economic impacts, and that (given the level of existing, operational employment uses in and adjacent to Butterwick & the amount of housing proposed there) there is no need for this site to be retained in employment use.

Officer Recommendation:

It is not considered that the comments call into question the sites' suitability. Consequently, it is considered that sites But002, But004 and But020 should be taken forward as 'Housing Allocations'.

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ID1: 237 comment_author: Mr Andy Carrott

comment content:

The following comments refer to the Preferred Housing Sites. If the status of any of the other sites changes or any other sites are added please re-consult with the Board.

Officer Comment:

Site But002 - The comments are noted.

Officer Recommendation:

It is not considered that the comments call into question site But002's suitability. Consequently, it is considered that site But002 should be taken forward as a 'Housing Allocation'.

But004 - a Board maintained watercourse exists on the roadside boundary of the site and to which Byelaws apply. No development (including but not limited to any structure, fence, landscaping, tree planting, paths is permitted within 9m of the watercourse without the prior consent of the Board. This watercourse could accommodate an attenuated surface water discharge.

Site But004 - The comments are noted. The Byelaw requirements would not prevent the residential development of the site, but would seek to influence the layout of the site to ensure that the Board's access to its drain was not compromised. The Board will consider relaxing the Byelaw to permit structures within 9m, but each site would have to be judged on an individual basis.

It is not considered that the comments call into question site But004's suitability. Consequently, it is considered that site But004 should be taken forward as a 'Housing Allocation'.

But020 - a Board maintained watercourse exists 35m (approx.) to the west of this site and could accommodate an attenuated surface water discharge. Existing properties separate the site from this watercourse.

Site But020 - The comments are noted.

It is not considered that the comments call into question site But020's suitability. Consequently, it is considered that site But020 should be taken forward as a 'Housing Allocation'.

In all cases Board's consent is required to discharge surface water to a watercourse (private or Board maintained).

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ID1:

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comment_author:

Heritage Trust of Lincolnshire

comment_content:

I have no objections to the proposals put forward on archaeological grounds.

It is likely that all sites in Butterwick would require archaeological intervention/survey prior to a planning application being submitted, in line with the NPPF.

This advice is subject to change depending on the level of information available (for example, new information may come to light).

Officer Comment:

The comments are noted.

Officer Recommendation:

It is not considered that the comments call into question the sites' suitability. Consequently, it is considered that sites But002, But004 and But020 should be taken forward as 'Housing Allocations'.

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ID1: 239 comment_author: Lincolnshire County Council

comment content:

But016, But027

Access to the site could be provided via Upsall Road. Development could be limited to natural features in the landscape (the drain to the west of But027 and the village end to the south to restrict But027 and But016). This would overcome the drawbacks put forward in the SHLAA and allow for development of an appropriately located site.

Officer Comment:

Site But016 - The SHLAA classifies site But016 as undevelopable, because its development would have adverse impacts upon the character and appearance of the area – i.e. It would extend the village's built-up area into a visually prominent area of open countryside (whereas alternative sites can consolidate the built-up area with lesser impacts). It was also a concern that the allocation of the site would be likely to generate pressure for further westward expansion, given that it is not contained by a strong and defensible 'natural' western boundary – it is not understood to what the consultee refers as “the village end to the south”. The western boundary of site But016 is defined by either non-existent landscape features, or ‘weak’ landscape features (a minor field-drain) which mean that it does not have the appearance of a discreet unit of land.

Site But027 - The SHLAA classifies site But027 as undevelopable, because: a satisfactory vehicular access cannot be provided - the Highway Authority comments that Upsall Road is unsuitable to provide vehicular access to further development - the carriageway is only 2.5m (approx) wide and is of concrete construction with a bitumen overlay, which suggests that the original concrete surface has suffered some decay; and because it would deliver dwellings in excess of the number sought for Butterwick over the Plan period. The site would deliver 90 dwellings (at 20 dwellings to the hectare) and this would mean that, if it were allocated, the Plan's provisions for Butterwick would be approximately 100 dwellings (when taken together with existing completions and commitments) instead of the 70 sought (i.e. A 42% over-provision).

Officer Recommendation:

The SHLAA classifies site But016 as being undevelopable, and consequently the site was not put forward as a Potential Housing Site in the January 2016 consultation, nor as a Preferred Housing Site in the July 2016 consultation. This objection does not raise any issues that suggest that the previous approach taken to this site was inappropriate. It is therefore considered that site But016 should not be taken forward as a 'Housing Allocation'.

The SHLAA classifies site But027 as being undevelopable, and consequently the site was not put forward as a Preferred Housing Site in the July 2016 consultation. The above objection does not raise any issues that suggest that the previous approach taken to this site was inappropriate. It is therefore considered that site But027 should not be taken forward as a 'Housing Allocation'.

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ID1: 240 comment_author: Environment Agency

comment content:

But020 lies within an area classified as 'danger for all' where potential flood depths of 1-2m are predicted within the Strategic Flood Risk Assessment's hazard mapping. We note your comment that the site is owned by a willing house builder and scores highly within the Sustainability Appraisal. 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 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 internal 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.

Officer Comment:

It is considered that, notwithstanding the flood mitigation measures that are likely to be required, an acceptable development scheme will be achievable for the site. Hume Planning Consultancy (on behalf of the site's owners) comments that "you will know that Broadgate Homes operate throughout Boston and South Holland and are aware of and familiar with, the issues and implications associated with flood risk. Each development site is assessed for viability in respect of on-costs that any flood mitigation measures might incur and the price paid for development land reflects the specific level of mitigation required for each particular site. Broadgate through their retained consultant (R M Associates, Contact Mr Ray Morgan, 10 Main Street, Thorpe on the Hill, Lincoln LN6 9BG) are familiar with the implications for development of the Strategic Flood Risk Assessment for the Plan area. The site at Butterwick has been considered accordingly and the overall viability assessment includes the need for the flood mitigation to make the site safe, a fundamental requirement of housing provision by a developer. On behalf of Broadgate Homes Ltd., I can confirm that the necessity for development to meet the Exception Test in the NPPF has been taken into account and it is recognised that potential flood depths of up to 2m are predicted. I can also confirm that Broadgate are aware of the need for flood mitigation for site But020 and that the dwellings will be safe for their lifetime. Therefore the development will be viable and deliverable for this site during the early part of the Plan period"

Officer Recommendation:

It is not considered that this comment calls into question the site's suitability. Consequently, it is considered that site But020 should be taken forward as a 'Housing Allocation'.

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ID1: 241 comment_author: Anglian Water

comment_content:

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 for detailed comments relating to these sites.

Officer Comment:

The comments are noted, and the Infrastructure Delivery Plan that will accompany the Local Plan will need to identify when and how the necessary enhancements to the water supply and foul sewerage networks will take place.

Officer Recommendation:

It is not considered that this comment calls into question the sites' suitability for allocation. Consequently, it is considered that sites But002, But004 and But020 should be taken forward as 'Housing Allocations'.

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ID1: 242 comment_author: Bloombridge LLP

comment content:

Overview

We consider that Produce World's redundant 3.43 hectare Mill Site should be allocated as a 'preferred site' for 35 to 70 units, including at least 1 hectare of land within this area being reserved for landscape mitigation, public open space and biodiversity enhancements. This would complement a 'dispersal' strategy for Butterwick, ameliorating the impact of new development on existing residents whilst also maintaining existing, in use employment sites currently proposed in the draft as 'preferred sites' for housing. importantly, the Mill Site is a sequentially preferable previously developed site in its entirety, with 'good' accessibility to the village (ie within a c800m walk). It is the only 'preferred site' that, according to the SHLAA, is available now. In these terms, the Mill Site has strong sustainability and soundness credentials.

With regard to the Main Works (now closed), whilst we have had no success finding an alternative agricultural or commercial use for this property in the last 12 months, Produce World will agree to continue the marketing campaign and, in effect, leave this site as a strategic employment site, consistent with the draft Local Plan. However, this is not a viable option in isolation. It is essential that the next draft of the Local Plan provides a strategy for both the Main Works and the Mill Site, with residential on the latter. Without this, Produce World is obliged to object to the proposed strategic employment allocation because this adds a further constraint (ie loss of employment land) to the current disposal and/or redevelopment plans for the Main Works.

Given the Parish Council resolved on 10 August 2016 to

Officer Comment:

Comments on Policy 1 are specifically considered as part of reviewing the Local Plan overall. However, the Objector's sites (including the Mill Site) are previously developed land where that previous use was for agriculture. Agricultural uses are not classed as brownfield/previously developed land under the government's guidelines.

No evidence is provided as to why Butterwick has a greater housing need to be met. The scale of growth proposed for Butterwick took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements and their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. The objection does not seek to address any of these issues. The objector is incorrect in their assertion that none of the preferred sites are available for release early in the Plan period – the development of But020 is expected to begin in 2018/19, and that of But004 in 2019/20. The availability of land for development is not, in itself, a sound argument for increasing the village's housing requirement.

Site But022

- It is agreed that it would be preferable to meet Butterwick's housing needs through the redevelopment of redundant, previously-developed land, rather than through the development of best and most versatile agricultural land, or areas of land that are currently in employment use. However, well-located examples of redundant previously-developed sites are not available;

Officer Recommendation:

No change to the Local Plan is recommended.

It is not considered that the consultees' comments justify a change to Butterwick's housing requirements. Consequently, it is considered that the Local Plan should continue to seek to identify housing allocations in Butterwick to provide for 70 dwellings between 1st April 2011 and 31st March 2036.

The SHLAA classifies site But022 as being undevelopable, and consequently the site was not put forward as a 'Potential Housing Site' in the January 2016 consultation nor as a 'Preferred Housing Site' in the July 2016 consultation. This objection does not raise any issues that suggest that the previous approach taken to this site was inappropriate. It is therefore considered that site But022 should not be taken forward as a 'Housing Allocation'.

It is not considered that the comments call into question site But002's suitability. Consequently, it is considered that site But002 should be taken forward as a 'Housing Allocation'.

It is not considered that the comments call into question site But004's suitability. Consequently, it is considered that site But004 should be taken forward as a 'Housing Allocation'.

It is not considered that the comments call into question site But020's suitability. Consequently, it is considered that site But020 should be taken forward as a 'Housing Allocation'.

suggest no changes to the 'preferred sites' in Butterwick, the enabling strategy now requested by Produce World could instead be founded on further dialogue, including with the local planning authority, plus:

1. An update to Policy 1 in the draft Local Plan that reflects the positivity and flexibility of the National Planning Policy Framework, seeking to grant permission unless any adverse impacts would "significantly and demonstrably" outweigh the benefits. In particular, an additional last paragraph to Policy 1 is sought to extend the presumption in favour of sustainable development by reflecting clear Government guidance to prioritize the redevelopment of 'previously developed' sites, on a plan-wide basis, ahead of the release of greenfield land (especially where 'best and most versatile' agricultural land is involved).

2. An increase in housing numbers for Butterwick given that (a) none of the 'preferred sites' are available for release in the early part of the plan period and (b) the village clearly has capacity to accommodate more development (on previously developed land).

We therefore object to the proposals in the latest consultation and request (a) the addition of a 'previously developed' criteria to the presumption in Policy 1 (b) an increase in housing numbers for Butterwick and (c) that the Mill Site is allocated for housing as enabling development linked to employment proposals at the Main Works.

We would add that if this strategic employment site is to be progressed, then the type of employment should be couched in the widest possible terms, including agricultural (current), B1, B2 and B8, and retail. These representations should be read alongside the Transport Statement provided by Vectos and the overview presentation prepared by our master planners, Space

- Site But022 does not abut the existing built-up area of Butterwick. It is physically unrelated to the existing village and, if it were to be developed, would create an incongruous group of dwellings that would be physically isolated from the existing village;

- The comments on the site's capacity are noted;

- Site But022 does not abut the existing built-up area of Butterwick – existing residential development in its vicinity is scattered only, and does not appear as part of the village. Whether or not the site is previously-developed, it is physically unrelated to the existing village and (if it were to be developed) it would create an incongruous group of dwellings that would appear physically isolated from the existing village. Although a well-conceived masterplan could no doubt reduce these adverse visual impacts to some extent (for example by screening the development from view), the site remains fundamentally unsuitable for residential development because of its physical separation from the existing village;

- The Local Plan identifies three Preferred Housing Sites in Butterwick – But002, But004 and But020. The SHLAA assumes that the development of: site But002 will begin in 2023/24; site But004 will begin in 2019/20; and site But020 will begin in 2018/19. It is considered unlikely that, if it were allocated, the development of site But022 would begin any sooner than But004 and But020;

- The comments on technical constraints, infrastructure and utilities are noted;

- The fact that site But022 is not located close to many existing dwellings is an inevitable consequence of its isolated position, remote from the village; and

- Whether or not the site is an 'acceptable' distance from local amenities, it is physically unrelated to the existing village and (if it were to be developed) it would

BU001 Produce World is one of the more suitable employment sites in Boston Borough and should be taken forward as a Preferred Option Established Employment Site.

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Strategy, both submitted in response to the latest consultation.

The Mill Site

The summary points in favour of allocating the Mill Site for development comprise:

1. The draft Local Plan proposes 70 new houses for Butterwick and the village has capacity to take more given that the Mill Site is a vacant, sequentially preferable previously developed site.
2. Various sites have been put forward, all of which (save the Produce World sites) are either existing employment sites or predominantly greenfield and 'best and most versatile' Grade 1 agricultural land.
3. Government policy is clear that previously developed sites are sequentially preferable to greenfield sites, and must be released for development as a priority.
4. The Local Plan seeks to protect existing employment sites and there is no evidence or logic to support housing development on existing, productive employment sites in Butterwick, whilst then allocating the Main Works for strategic employment without any consultation on suitability or viability with Produce World. There is no recent evidence to support large scale B1, B2 or B8 employment in Butterwick (the Main Works are rated as agricultural).
5. The Mill Site is not "isolated" and development would not present as "a group of dwellings in the countryside" as per the SHLAA (But 22). The site is 'walkable' to the key village services, being within the standard c800m distance that represents a 10 minute walk, ie 'good accessibility' (see Manual for Streets). In practice, there is little to choose between 800m and 400m ('excellent accessibility') in terms of the sustainability advantages they offer. With the Main Works left as a strategic employment site, the Mill Site would have the added advantage of being very

create an incongruous group of dwellings that would appear physically isolated from the existing village. Whilst proximity to a potential strategic employment site would undoubtedly be an asset for a potential housing site, site But022 is still considered fundamentally unsuitable for residential development because of its physical separation from the existing village.

Site But002

- The site's owner indicates that the site is expected to be released for development in 2022 (i.e. in 6 years). It is not agreed that this makes the site unsuitable for allocation in terms of the provisions of para. 47 of the NPPF – the trajectory for Butterwick shows that predicted housing growth is strongly 'loaded' towards the first parts of the Plan period;
- The site is currently in use (and is allocated in the adopted Boston Borough Local Plan (April 1999)) as employment land. However, the Employment Land Technical Paper (Aug 2015) concludes that the site is not of a strategic scale, that its loss would be unlikely to have adverse economic impacts, and that (given the level of existing, operational employment uses in and adjacent to Butterwick & the amount of housing proposed there) there is no need for this site to be retained in employment use;
- Only one neighbour commented on site But002 in response to the January 2016 consultation, and none have commented in response to the July 2016 consultation. Thus, there is no evidence to suggest that the site is likely to be 'unpopular or difficult to deliver'.

Site But004

- The SHLAA assumes that the development of site But004 will begin in year 9 of the Local Plan period

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accessible to these jobs, but these master planning and enabling development considerations need to be reviewed through meaningful

engagement between the Councils and Produce World.

6. The Mill Site could accommodate more than 70 new houses, but a more sustainable outcome would be to limit the number of units to no more than 70 and include planting and public open space within the 3.43 hectares in order to mitigate any visual impact and to enhance green space and biodiversity locally.

7. The suggestion that housing at The Mill would be "incongruous" is not supported by any evidence and seems to ignore the nearby housing in this location, the fact that this site is previously developed, and that there is at least 1 hectare of spare land that can be used to mitigate any adverse impacts. Indeed, a well-conceived master plan would deliver enhancements to the village (and sustainable development) making an early, useful contribution to housing need locally.

8. The Produce World sites are available now (and are in need of an urgent planning response), whilst all of the other sites are not available for development for at least 5 years. This is an important consideration in the context of Government policy to "boost significantly the supply of housing" (NPPF, para 47). We therefore consider that Produce World's Mill Site ought to be allocated for development. The matrix that follows sets out the key parameters for the Produce World sites versus those sites currently considered by the local planning authority as 'suitable' for development, as shown below.

SHLAA Address Availability Units Current Use Walkable
Ref: @ 30 dph

But 2 East of Sea Lane 11 " 15 yrs 32 Allocated c400m
employment

(2019/20), and will be completed by year 15 (2025/26).

It is not agreed that alternative sites are likely to be delivered any sooner;

- Although the site contains some existing development (a dwelling, an agricultural shed and a glasshouse) the majority is not previously-developed. It is accepted that it would be preferable to meet Butterwick's housing needs through the redevelopment of previously-developed land, rather than through the development of greenfield sites. However, well-located examples of such sites are not available in sufficient numbers to meet Butterwick's housing needs;

- No neighbours commented on site But004 in response to the January 2016 consultation, and none have commented in response to the July 2016 consultation. Thus, there is no evidence to suggest that the site is likely to be 'unpopular or difficult to deliver'.

Site But020

- The SHLAA assumes that the development of site But020 will begin in year 8 of the Local Plan period (2018/19), and will be completed by year 15 (2025/26). It is not agreed that alternative sites are likely to be delivered any sooner;

- It is agreed that it would be preferable to meet Butterwick's housing needs through the redevelopment of previously-developed land, rather than through the development of best and most versatile agricultural land. However, well-located examples of previously-developed sites are not available in sufficient numbers to meet Butterwick's housing needs; and

- No neighbours commented on site But020 in response to the January 2016 consultation, and none have commented in response to the July 2016 consultation. Thus, there is no evidence to suggest that the site is likely to be 'unpopular or difficult to deliver'.

But 3 North of Water Lane 6 " 10 yrs 35 Not PDL'
c400m

But 4 East of Benington 6 " 10 yrs 31 Not PDL c400m
Road

But 19 North of Brand End 6 " 10 yrs 66 Greenfield
c400m Road

But 20 North of Peter Paine 11 " 15 yrs 23 Grade 1 ag
land, not c400m Close PDL _

But 21/24 PW Main Works Site Now 139 PDL c800m

But 22 PW Mill Lane Now 103 PDL c800m

*PDL = 'previous|y developed land'

This is the sort of matrix that (suitably extended) the Soundness Self-Assessment Checklist advocates for the consideration of reasonable alternatives, being a "clear audit trail showing how and why the preferred approach was arrived at". The Mill Site unquestionably passes the test.

We are advocating a range of 35 to 70 units on the Mill site. We consider that this number is sustainable, and we have identified no major technical constraints; and being previously developed land, the basic infrastructure and utilities provision is in place.

Finally, we note that sites very close to where a lot of people live often prove to be unpopular and therefore difficult to deliver. The Mill Site impacts on the least number of local residents and is unlikely to give rise to the usual 'last minute' objections at the EIP stage.

Whilst the Mill Site is separated from the village, it is not an unacceptable distance from local amenities, including the school. Widely accepted planning standards record 800m as 'good accessibility' and 1200m as 'adequate'. So the separation is not unsustainable, nor is it a constraint to development. Indeed, if both sites are master planned as part of an enabling development package, then new housing on the Mill would be very close to a strategic employment

It is accepted that the Main Works are closed, and have been marketed for a period of time, although no evidence has been submitted to support the view that a suitable alternative agricultural/commercial enterprise could be found. Ongoing promotion of the site for employment use is welcome. The suitability of the Mill Site for residential use is a matter for the Butterwick Housing Paper (October 2016). If the site were to be taken forward as an employment site, and the owners wished to promote an alternative use, it is correct that the owners would need to justify the loss of employment land against the requirements of the relevant Local Plan policies. The Local Plan needs to ensure that where possible housing and employment are closely located. As such the intention is to retain the site for employment use (B1, B2 and B8) and ancillary development necessary to the effective functioning of the site. This potentially could include agriculture but not retail as this would be contrary to the town centres first approach promoted by the Local Plan and could adversely impact upon the vitality and viability of the town centres.

site (on the Main Works). Putting houses next to jobs in this way is a widely accepted planning strategy for delivering sustainable development.

Crucially, if the Local Plan does not provide for the redevelopment of the vacant Mill Site, how else can it be redeveloped during the 20 year plan period?

The Main Works Site

We have already made the point that this agricultural production site has little potential for B1, B2 or B8 development. There have been no enquiries in the last 12 months. There is no sense in proposing this strategic employment allocation in isolation without regard to the market or without meaningful engagement with Produce World. A planning strategy based on 'allocate and employment will follow' is not deliverable, effective or justified " ie it is unsound. It is clear that smaller scale employment is more suited to Butterwick (as evidenced by the existing employment in the village), yet the 'preferred sites' document currently accepts the replacement of this small scale, valuable employment for housing.

We cannot support a strategic employment allocation of the Main Works in isolation to the Mill as this may fetter plans for this site in the future by means of 'loss of employment land' arguments. The proposed employment land allocation will only be supported by Produce World if a wider package of enabling development is put in place as part of the plan-making process. This requires meaningful engagement with Boston Borough Council. Without this engagement, and changes to the draft Plan, we are obliged to object to the strategic employment allocation and withdraw the Main Works site from further consideration.

Sustainability Appraisal

With regard to the Mill Site (But 2), we disagree with

the description at Objective 8 that development of this site of would be "incongruous". There is no evidence to support this assertion and, moreover, it is an illogical statement given the existing production and storage uses of the site. Housing, with approximately 1 hectare of mitigation, will have a very low impact from a landscape and visual perspective. It is likely to present an enhancement. For the same reasons, the 'red' (negative) designation of the Mill Site under Objective 11 (flooding) appears to ignore the fact that the site has previously been occupied for many years free of flooding.

Next Steps

1. We request a dialogue with Boston Borough Council.
2. Through dialogue and meaningful engagement on an enabling development strategy we consider that the Main Works and Mill can be added to the draft Local Plan and, potentially, the housing numbers for Butterwick can be increased.
3. A new paragraph needs to be added to Policy 1 dealing with a presumption in favour of sustainable development on redundant 'previously developed' sites, like the Mill. This would ensure positivity and flexibility in line with paragraph 14 of the NPPF. Policy 1 should also deal with the (typical) scenario whereby policies in the Plan point in different directions. It is rare for a planning application to be wholly consistent with the development plan; meaning that Policy 1 should be specifically about positivity 'on balance' from a policy perspective before looking to 'other material considerations' (and a Departure).
4. We request that the draft Sustainability Appraisal is recast to reflect the previously developed nature of the Produce World sites, their inherent sustainability, the availability of infrastructure (including drainage and power), and the offer of land for mitigation, landscape

enhancement, public open space and biodiversity.
