

SOUTH EAST LINCOLNSHIRE LOCAL PLAN: HOUSING PAPER – SUTTON BRIDGE (JANUARY 2017)

1 SUTTON BRIDGE'S PLACE IN THE SPATIAL STRATEGY

- 1.1 Policy 2 of the South East Lincolnshire Local Plan 2011-2036 Preferred Sites Consultation (July 2016) identified Sutton Bridge as a 'Main Service Centre'.
- 1.2 **Comments received** - The following support was received in relation to Sutton Bridge's place in the Spatial Strategy:
1. support Sutton Bridge as a Main Service Centre as it will accommodate future development to help meet its need.
- 1.3 Given this support, it is considered that Sutton Bridge should remain as a 'Main Service Centre'.

2 SUTTON BRIDGE'S HOUSING REQUIREMENTS

- 2.1 Policy 12 of the South East Lincolnshire Local Plan 2011-2036 Preferred Sites Consultation (July 2016) identified that housing allocations should be made in Sutton Bridge to provide for 210 dwellings between April 2011 and 31st March 2036.
- 2.2 **Comments received** - The following comments were received concerning Sutton Bridge's housing requirements:
1. the Environment Agency 'are disappointed to note that the number of dwellings to be allocated to this settlement has increased from 180 to 210 as Sutton Bridge is at a high risk of flooding from the tidal River Nene. But are pleased to note that the preferred site allocation is the most sequentially preferable in flood risk terms';
 2. support the increase in the housing requirement from 180 to 210 dwellings because it takes account of the population of the parish, the local rate of housing growth and the local availability of land at lower risk of flooding. The slight increase in housing growth will also help deliver the infrastructure necessary to support viable, sustainable development over the plan period. The increase will provide a better distribution of housing in those settlements which are identified to accommodate new development;
 3. note that the housing targets are inclusive of extant planning permissions (22 units) and dwellings built (21 units) since April 2011. As such, there is a need to allocate land to accommodate at least 167 new dwellings to meet the overall need of 210 dwellings. But 210 dwellings should not be a maximum figure. Sutton Bridge is a Main Service Centre where a higher amount of residential development could be accommodated to meet the housing need and demand of the area during and beyond the plan period.

Acknowledging that an additional 167 dwellings is not a maximum figure will provide flexibility within the Local Plan to ensure it is in accordance with the National Planning Policy Framework which seeks to boost the supply of housing and promote the presumption in favour of sustainable development.

2.3 **Responses to the above comments:**

1. it is acknowledged that Sutton Bridge is at high risk of flooding from the tidal River Nene, however the Environment Agency have provided detailed guidance relating to mitigation (in section 4.3) to ensure that all new development will be designed to a safe standard. As such, a slight increase of 30 dwellings in the housing figure is considered appropriate to deliver a better form of flood resilient development in Sutton Bridge and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period;
2. support for the increased housing figure, its location and the evidence base upon which the figure is based is welcome. The potential for 210 dwellings to support new infrastructure over the plan period is also acknowledged;
3. the housing figures are a minimum rather than a maximum target; this approach will help ensure that there is sufficient flexibility over the plan period to accommodate development to meet South East Lincolnshire's housing needs. The scale of housing growth proposed for Sutton Bridge took account of many issues, including: the findings of the 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 availability of employment land, and the local availability of land at lower risk of flooding. The level of housing growth proposed for Sutton Bridge stemmed largely from the availability of land with lower flood hazard in and around that settlement and the sustainability credentials of the settlement. Therefore it is considered that the provision of at least 210 dwellings will adequately meet local needs over the plan period. The housing need and the location of dwellings to support that need beyond the plan period, is a matter to be determined by the next Local Plan;

- 2.4 It is not considered that the comments made by consultees justify a change to Sutton Bridge's housing requirements. Consequently it is considered that the Local Plan should seek to identify housing allocations in Sutton Bridge to provide for 210 dwellings between April 2011 and 31st March 2036.

3 **SUTTON BRIDGE'S RESIDUAL REQUIREMENTS**

- 3.1 **Completions** - Between 1st April 2011 and 31st December 2016, 21 new dwellings were built in Sutton Bridge.

3.2 **Commitments** - As at 31st December 2016, planning permission was outstanding for the construction of 25 dwellings in Sutton Bridge, and there is no evidence to suggest that these permissions will not be implemented during the Plan period.

3.3 **Residual requirement** – Given the above figures, the identification of land to accommodate approximately 164 dwellings is required.

4 **INFRASTRUCTURE**

4.1 **Education** – the County Education Department has commented that there is sufficient capacity at the primary school for the level of development proposed. There is limited secondary capacity from 2016-2018, additional capacity would be required but The Peele School has sufficient land to expand. There is a lack of capacity at sixth form level at University Academy Holbeach. A study will be required to identify the nature of the buildings to be delivered and will be dependent on each schools needs.

4.2 **Health** – the CCG's have commented that currently there is some capacity at the local GP surgery(ies) to accommodate additional patients, however County-wide there is an increasing shortage of GP's, nurses and other healthcare staff which could affect future capacity should demand increase.

4.3 **Flood risk** – the Environment Agency has made the following comments:

- allocations in areas of hazard would need to ensure that finished floor levels are raised to the appropriate level with additional flood resilient construction incorporated into proposals. Developers would need to confirm that they can achieve required mitigation and that the proposal would still be deliverable.
- Adopt a Flood Risk Mitigation Policy to ensure safe development. Finished floor levels (FFL) should be informed by the predicted flood depth maps as:
 - depths of >1.6m: it is unlikely that mitigation measures would prevent flood water from entering the building at ground floor level. Therefore proposals must be a minimum 2 storey with no ground floor habitable accommodation. The first floor living accommodation shall be above the highest predicted flood depth;
 - depths of 1-1.6m: proposals must be a minimum 2 storey, with FFL set a minimum of 1m above ground level, flood resilient construction shall be used to a height 300mm above the predicted flood level, demountable defences to 600mm above FFL;
 - depths 0.5m-1m: FFL to be set 1m above ground level, flood resilient construction shall be used to a height 300mm above the predicted flood level, (single storey proposals must consider the 0.1% + climate change event for setting FFL).

- 4.4 South Holland IDB identifies that 'in line with current recommendations the use of Sustainable Drainage Systems (SuDS) should be considered as a first approach to dealing with surface water run-off. Consent for the discharge of surface water to a watercourse must be obtained from the IDB. If the surface water run-off rates can be restricted to 1.4litres/sec/Ha, then there will be minimal impact on the drainage network. However, in certain circumstances, where restriction down to this rate is not possible, the IDB may consider allowing a higher rate, if it is considered appropriate. Discharging surface water to a watercourse may incur a Surface Water Development Contribution Fee, depending on the rate of discharged agreed with the IDB.
- 4.5 Where SuDS are consented as the surface water drainage method, it is important that a future maintenance regime forms part of the consent. Without maintenance SuDS will not function in the long term. IDBs are prepared to take on the maintenance of certain types of SuDS on a site by site basis, and subject to payment of a commuted sum to cover future costs. If this is the preferred option, developers should consult with the IDB at an early stage to incorporate the IDB's requirements for maintenance access etc.
- 4.6 Where a site relies on private watercourses to convey flow to the Board's system, consideration should be given to the condition of the private drainage system and whether it is capable of dealing with the proposed flows. Where a development results in an increase in flow above the 1.4l/s/Ha greenfield rate then riparian owners should be consulted to see if they are willing to take the extra flow. If a private watercourse requires improvement to cater for the flow from the development then this would have to be undertaken at the developers cost with the agreement of the riparian owners downstream.
- 4.7 Where a site is adjacent to an IDB watercourse, Byelaws will apply which may restrict elements of the development. In such cases consent will be required from the IDB.
- 4.8 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).
- 4.9 **Sewage Treatment** – The Environment Agency has commented that the Sutton Bridge Water Recycling Centre (Sewage Treatment Works) has capacity for 3,780 houses. Anglian Water has commented that the Water Recycling Centre has capacity available to serve the site, and that the foul sewerage network will need upgrading to accommodate each site.
- 4.10 **Water Supply** – Anglian Water has commented that water resources are adequate to serve the proposed growth. The supply network would require upgrading for the site.

5 SUTTON BRIDGE SITE OPTIONS

- 5.1 Inset Map 10 of the South East Lincolnshire Local Plan 2011-2036 Preferred Sites Consultation (July 2016) identified one 'Preferred Housing Site': Sub013.

5.2 **Comments received** - The following comments were made on site **Sub013 (Land to the south of Bridge Road, Sutton Bridge)**:

1. the Environment Agency identifies that 'the depths of flooding identified in the SFRA will need to be mitigated through design in order to pass the Exception Test – i.e. depths generally are 0.5-1.0m, with an area to the south of the site where depths are 1-2m. It is important that the developer 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 site 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 - sometimes needing to be 3 storeys with no ground floor habitable rooms – such requirements can conflict with other planning policies. There must be confidence that the site can incorporate the required mitigation and still be acceptable on other planning grounds';
2. the site will be affected by noise from the A17. There will be overlooking of the bungalows on Falklands Road;
3. there is no evidence that the impact of development on infrastructure, has been taken into account because the local infrastructure (schools, doctors, police and ambulance service) cannot accommodate the demand that will be generated;
4. need more work for people who will live in the new homes;
5. there will be more traffic on Bridge Road and there are no enforceable restrictions at the moment;
6. Sub013 effectively expands the Falklands Estate and is a logical progression for housing. Support this providing that any development creates a green space, ideally linking up and adopting the area known as Billy's Wood;
7. Sutton Bridge Parish Council are concerned that no new green spaces have been defined. Green Spaces are under-provided in Sutton Bridge. Green areas should be included within new housing areas above an absolute minimum;
8. Sub013 is likely to constitute 90% of all new housing provision for Sutton Bridge in the plan period, on one site and in one ownership. This introduces a delivery risk. If the site were delayed or did not come forward it could lead to a significant deficit within the town;

5.3 **Responses to the above comments:**

1. further work will be undertaken with the promoters of Sub013 to ensure that they are aware of the likely flood mitigation measures expected on this site, and the associated costs, to ensure that flood risk does not adversely impact

- upon the viability of the development, and so that an acceptable design can be achieved;
2. a noise assessment may be required to identify noise levels from the A17, and if necessary identify noise attenuation measures such as acoustic barriers, buffer zones (which could also incorporate open space) and acoustic vents in dwellings. Therefore, it is considered that any adverse noise impacts can be satisfactorily addressed through the planning application process;
 3. the Local Plan will have to demonstrate how arising infrastructure needs will be met. This will be evidenced through the Infrastructure Delivery Plan and subsequent versions of the Local Plan;
 4. about 8ha of new employment land is being allocated in the Sutton Bridge/Long Sutton area to support new businesses. Additionally, seven employment sites are being protected for ongoing employment use, most have space to expand or intensify on site. This level of provision is considered appropriate to help provide employment for existing and future residents that may want to work in the area;
 5. the Highways Authority identifies that 'the opening [along Bridge Road] is long enough to be able to accommodate a suitable junction with the required visibility splays. This is within the 30mph limit.' Therefore, it appears that a satisfactory access solution can be achieved, although inevitably this will generate additional traffic on Bridge Road, but additional traffic will be a consequence of most Preferred Sites. The need for additional highways safety measures required as a consequence of development will be a matter for a planning application;
 6. support for Sub013 is noted. Development of 11 or more dwellings is currently expected to provide for open space. The design of the development will help determine where the open space should go, although on Sub013, flood risk and amenity issues relating to proximity to the A17 may influence the location of some space to the south of the site adjacent to Billy's Wood. The LPA can only seek developer contributions for infrastructure and works necessary to make the development acceptable in planning terms; so 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 and take responsibility for future maintenance; this would need to be addressed through an open space management plan submitted with a planning application;
 7. the Local Plan should only identify sites for development which can be delivered; there are no sites identified for green space in Sutton Bridge at the moment, therefore none are shown. The location of new open space delivered through new development is only identified on mapping systems once development takes place so that the exact location and boundary can be recorded. The amount of open space sought on site 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. Requiring open space in excess of the minimum may not, therefore, be possible as part of a viable development;

8. it is acknowledged that Sub013 is the only preferred housing site in Sutton Bridge, and that the site is in a single ownership. Even so, the SHLAA identifies that 'there is a reasonable prospect that it would be developed (assumed to begin in year 10 and be completed before year 20). The Housing Implementation Strategy and Local Plan monitoring framework (which will accompany subsequent versions of the Local Plan) will demonstrate how housing needs in Sutton Bridge will be met over the plan period should the preferred site not come forward as expected;

5.4 **Conclusions on site Sub013** – It is considered that site Sub013 is the most suitable Preferred Housing Site in Sutton Bridge, and that it should be taken forward as a Housing Allocation:

- the Sustainability Appraisal scores site Sub013 as having one very positive (green) impact relating to access to employment although a further eight (blue) impacts could deliver positive impacts as a result of a high quality design and the delivery of infrastructure to meet the needs of future residents such as open space and school places;
- Sub013 is within the Sutton Bridge settlement boundary and is accessible to existing services and facilities;
- 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 '0.5-1m', which is one of the most sequentially preferable site in Sutton Bridge;
- although the SHLAA identifies that opening-up infrastructure costs are likely to be relatively high (including flood mitigation costs) ... if it is allocated there is a reasonable prospect that it would be developed (assumed to begin in year 10, and be completed before year 20) [the plan is currently in year 6], so this site is considered to be deliverable, therefore able to contribute to the Council's five year supply of available housing sites.

6.0 ALTERNATIVE HOUSING SITES

6.1 Three alternative housing sites were put forward:

6.2 **Comment received:** The following comment was made, promoting site ***Sub026 (West Bank, Sutton Bridge)***:

1. disappointed that Sub026 has not been identified for residential development. It backs onto the golf course and fronts the River Nene and the new £900,000 commercial and leisure marina. A redefinition would preserve the lived-in feel of the area;

6.3 **Response to the above comment:**

1. the SHLAA identifies that 'the site is currently in a variety of commercial uses and its owners have not been identified. The owners' intentions for the land are unknown, and consequently the site cannot be considered as available'. This means that the site cannot be considered for housing development during this plan period;

6.4 **Conclusions on site Sub026** - the SHLAA classifies site Sub026 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 Sub026 should not be taken forward as a 'Housing Allocation'.

6.5 **Comment received:** The following comment was made, promoting site ***Sub024 (Land to the north of Withington Street and Chestnut Street, Sutton Bridge)***:

1. a small part of Sub024 is allocated within the 2006 Local Plan. It has not yet been brought forward because of a wish to see a more comprehensive form of development;
2. Sub024 is integrated into the existing built environment, is closer to the settlement centre and services than site Sub013 which would be an incursion into open countryside;
3. the SFRA is the most up to date evidence published. On the Actual Risk and Predicted Time Contours maps, present day and 2115, most of Sub024 is outside the area where flood water is predicted to reach within 3 hours whereas most of Sub013 is within the 3 hours contour in both cases. Actual flood risk and residual flood risk show predicted depths of no greater than 0.5-1.0m on sites, and actual and residual flood hazard on both sites in 2115 is equivalent with current day hazard, and lower on Sub024. There is no sequential preference to Sub013. Direct information has been sent claiming to be from EA maps - this contradicts the SFRA and leads to an incorrect conclusion relating to Sub024. Sub024 has sequential preference to Sub013 in the short term and is no worse in sequential terms in the future. The predicted flood depths are not in excess of 1.6m, are mainly 0.5 - 1.0m with small areas that could be utilised as open space areas between 1.0 and 1.5m in extreme future events;
4. the highway assessment for Sub024 lists all the potential access points, which have the benefit of access and traffic being spread over a number of junctions rather than overloading any one. It concludes that a satisfactory vehicular access could be provided. The intention is to also utilise Allenby Chase and achieve a combination of access points. There are no highway grounds to prefer Sub013 to Sub024. Sub024 is better placed for

pedestrian and cycle journeys between the site and village facilities and in particular the Primary School which it adjoins. There is scope to improve access to the school as part of proposals if desired;

5. Sub024 has an area of 3.3 ha and could accommodate around 60-80 units with appropriate landscaping and open space. This is in relation to a residual need for Sutton Bridge of 167 homes. The site is available and a planning application will be submitted shortly for the part of Sub024 in the settlement boundary;
6. to ensure more certainty of delivery should allocate Sub024 (70 units) and the northern part of Sub013 (100 units). This would enable a further allocation of the southern part of Sub013 on review of the plan, likely to be within 5-10 years.

6.6 **Response to the above comments:**

1. it is accepted that a small part of the site is allocated in the South Holland Local Plan, and the owners intentions for the site are acknowledged;
2. the Sustainability Appraisal identifies that Sub024 is closer to Sutton Bridge town centre and other local community facilities, however site Sub013 is still within an appropriate walking distance to a local convenience store, health centre and primary school. Sub024 will form an extension of the built form along the northern boundary, and the SHLAA identifies that Sub013 would 'extend the town towards the A17 as the Falklands Estate has and therefore is in character', so it is not accepted that Sub013 is an incursion into the countryside;
3. it is accepted that the most up-to-date published flood risk evidence is the SFRA. The Environment Agency identifies that 'some of the maps used by the agent are not the scenarios that [we] agreed should be used to apply the Sequential Test. Actual Risk maps are not considered appropriate for this purpose because they only show outputs from breaches where overtopping is thought likely to occur (where the minimum freeboard requirements are not apparent) and then breach is assumed to follow. National guidance requires the use of Residual Risk maps because national planning guidance says the consequences of defence failure must be considered – this is regardless of overtopping/freeboard allowances. The agent compares the 'short term' present day scenario, but again this is not applicable because planning guidance requires us to consider the lifetime of residential development, which is 100 years ahead'. Mapping extracts sent to the agent are taken from the EA's hazard maps, available on request from the EA. The Environment Agency identifies that 'there is a difference between the SFRA and the EA's hazard maps. At the time the SFRA was undertaken, the EA were undertaking hazard mapping for the East Coast to feed into the Lincolnshire Coastal Study. It was the EA's opinion that secondary, as well as primary, flood defences should be breached in the modelling – Royal Haskoning had only modelled the

primary defence breaches along the coastline in the SFRA. However, rather than Royal Haskoning redoing their model, it was decided that the EA's model would be used – amalgamated into the modelling for the River Nene as soon as possible. This was done but it is not part of the published SFRA. The maps supplied show this amalgamated modelling scenario, which is considered the most up to date information on risk to Sutton Bridge. The SFRA is being updated as it is no longer considered to be the most up to date information on flood risk; additionally it does not cover all the areas where sites are being allocated, hence the need to update. The draft outputs of the updated SFRA for Sutton Bridge now appear identical to the EA's hazard mapping for this area. The EA's hazard maps (and the draft updated SFRA outputs) show that approximately 60-70% of Sub024 has depths of 1-2m. Sub013 has approximately 30% of depths of 1-2m, with 70% being 0.5-1.0m. Sub013 is therefore the most sequentially preferable site in terms of flood depths predicted on site in the correct modelled scenario';

4. the Sutton Bridge Housing Paper (July 2016) accepts that development on Sub024 'should be served by all roads leading northwards from Bridge Road so that traffic movements are not concentrated on one road'. However it states that while 'it appears that a satisfactory vehicular access could be provided, arrangements for other, alternative sites will be more straight-forward', e.g. relating to ransom strips, no evidence has been submitted to counter this point. It is accepted that there is scope to enhance access to the primary school and other facilities through Sub024;
5. the SHLAA identifies that at 20 dwellings to the hectare (the preferred site density for Sutton Bridge) Sub024 could accommodate 74 dwellings. The site's availability is noted, and the proposed planning application for the site is welcome;
6. the SHLAA does not identify any deliverability concerns with Sub013 therefore there is no need to identify two Preferred Sites in Sutton Bridge;

6.7 **Conclusions on site Sub024** - the SHLAA classifies site Sub024 as being developable, but the site was not put forward as a Preferred Housing Site in the July 2016 consultation because it is less sequentially preferable in flood risk terms than the Preferred Site. 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 Sub024 should not be taken forward as a 'Housing Allocation'.

6.8 **Comment received:** The following comment was made, promoting site ***Sub025 (Land to the south of Bridge Road, Sutton Bridge)***:

1. support the inclusion of this site for housing development;

6.9 **Response to the above comment:**

1. the SHLAA identifies that ‘the site is not within or adjacent to Sutton Bridge’s existing built-up area (defined settlement limit)’ therefore the SHLAA recognises that the ‘site’s development would harm the appearance of the area – it would create an incongruous ribbon of development that would appear unrelated to the existing town’;

6.10 **Conclusions on site Sub025** - the SHLAA classifies site Sub025 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 Sub025 should not be taken forward as a ‘Housing Allocation’.

7 NEW SITES

7.1 No new sites were put forward for consideration as Potential Housing Sites in Sutton Bridge.

8 HOUSING ALLOCATIONS AND TRAJECTORY

8.1 It is considered that site Sub013 should be taken forward as a Housing Allocation. This site has a capacity of 210 dwellings, increasing the overall housing target to 256. However given that approx. 22% of the site (in the southern area) is classified as having a flood depth in 2115 as ‘1-2m’ it is likely, that with flood mitigation, the density of this site will be lower than 210 dwellings. In practice, therefore, the overall housing figure for Sutton Bridge will be much closer to the target of 210 dwellings than the trajectory below suggests. [The capacity of the sites assumes that they will be developed at a density of 20 dwellings to the hectare.]

8.2 This allocation and other development opportunities, provide the following trajectory for Sutton Bridge. [The plan is currently in year 6].

	Years 1-5	Years 6-10	Years 11-15	Years 16-20	Years 21-25	TOTAL
Completions	21	0	-	-	-	21
Commitments	-	25	-	-	-	25
Sub013	0	25	125	60	0	210
TOTAL	21	50	125	60	0	256