



South East Lincolnshire
Joint Strategic Planning Committee

SOUTH EAST LINCOLNSHIRE LOCAL PLAN EXAMINATION

Tuesday 5 December 2017

Day 13

**Venue: South Holland District Council
at 2.00 pm**

A G E N D A

Afternoon Hearing Session

- 1. Matter 9: Allocations – Non-Strategic Sites in the Sub Regional Centres
(MIQs Attached)**
- 2. Additional Questions (Attached)**
- 3. Any Other Business**

Participants:

South East Lincolnshire Joint Strategic Planning Committee

Annabel Parkinson, Longstaff & Co

Alex Roberts, DLP Planning representing Mr R Hardy and Richard Hardy

Michael Braithwaite, Robert Doughty Consultancy representing Various Clients

Annette Hewitson, Environment Agency

Matter 9: Allocations (Policies 8, 11, 12, 13)

Issue: Whether the housing and employment allocations are soundly based and whether they provide sufficient flexibility to meet identified need

247. Is the Plan positively prepared? Will the capacity of allocated sites be sufficient to meet the identified requirements for housing and employment uses across the whole plan area and within individual settlements?
248. Will the range and type of allocations provide sufficient flexibility to respond to changes in circumstances during the plan period?
249. Are the potential constraints and site requirements for individual allocations clearly identified within the Plan? Does the Plan provide an appropriate level of detail on the form, scale, access and quantum of development proposed for the allocated sites? (NPPF, paragraph 157)
250. Has a consistent approach been taken with regards to identified sites with extant planning permission where a technical start on site has been made? Are any differences in the approach taken to the commencement of development clearly justified? For example, is the apparent difference in approach explained between the Butterfly Park site at Long Sutton and the site at Spalding Road, Sutterton?
251. What assessment has been undertaken of the likelihood of development coming forward on sites with permission? What evidence exists to support this assessment? How have anticipated timescales for the delivery of these sites been established?
252. Will the Plan provide for the effective delivery of development? Does the Plan provide 'a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency' (NPPF, paragraph 17)?
253. The phased development of the Sustainable Urban Extensions at Spalding and Holbeach is identified within the Plan, as well as that for retail development in Spalding. Was consideration given to a wider phased approach to the delivery of development, either across the whole Plan area, or in relation to specific settlements?
254. What assessment process was followed to determine whether the development of individual site allocations would be suitable and achievable and whether the sites are available? Are this assessment and the resulting allocations supported by adequate and up-to-date evidence? Was the process followed the same for housing and non-housing allocations? Was a reappraisal of the suitability of previously allocated land undertaken? How does this process interact with the SA?
255. Briefly explain the process followed for individual site assessment in relation to the following matters? What evidence supports these assessments? Are the conclusions reached clearly justified?

- flood risk
- effectiveness and suitability of sustainable drainage systems
- the provision of transport infrastructure, highway safety and capacity, public transport, pedestrian and cycle links
- other types of physical infrastructure provision
- contamination, ground conditions and previously developed land
- agricultural land quality
- mitigation measures identified within the HRA screening and AA process
- protected species or habitats
- biodiversity
- green infrastructure provision
- the setting and significance of heritage assets, including whether any adverse impacts are capable of effective mitigation and, if not, how the resulting harm to the heritage assets is justified
- the visual impact of individual allocations and their effect on the character of an area
- viability

256. How were the assessment criteria weighted for individual allocations? Were any of the criteria decisive? Is the site allocation process clear and robust? Is the choice of allocated sites justified? Were reasonable alternatives considered? Is it clear why these were not allocated?

257. Is the choice consistent with the aims of national planning policy? Were sites of lesser environmental value preferred? Do the allocations encourage the effective re-use of previously developed land?

258. Will all the allocations achieve net gains across all three of the dimensions of sustainable development (NPPF, paragraph 152)? Will any of the allocations result in adverse social, economic or environmental impacts? If so, have any effective mitigation, or suitable compensatory, measures been identified for these sites? Are these measures justified?

Policy 8: Improving South East Lincolnshire's Employment Land Portfolio

259. Do the extent and location of employment site allocations meet the identified requirement for employment land? What flexibility is provided within the allocations and the policies of the Plan to respond to changing circumstances in the future, including market signals?

260. What methodology has been used to calculate the floorspace capacities of individual sites? Has this taken into account specific variables, such as known site constraints?

261. Has sufficient detail been given in the SELLP to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the "what, where, when and how" questions)?

Policy 11: Distribution of New Housing

262. Does the Plan identify sites with planning permission, or new homes built since 2011, which contribute to meeting the identified housing requirement? How

have recent permissions granted on non-allocated sites been taken into account in the assessment of proposed allocations?

263. Do the allocations in Table 3 provide for sufficient housing to meet the requirements for each settlement, as identified in Policy 11? Do the allocations provide sufficient flexibility to respond to changes in circumstances? How is it intended that any shortfall would be addressed?
264. Are the extent and variety of housing allocations within each settlement justified? Will they provide for the effective delivery of new housing within the settlement? Do they appropriately reflect the spatial strategy, including sequential location in terms of flood risk?
265. How have individual housing allocations been assessed in relation to their connections to local services and facilities?
266. How has the issue of social infrastructure provision been assessed for individual housing allocations? How has school capacity been calculated? Would there be sufficient capacity within existing schools to meet the demand likely to be generated by new dwellings? If not, how would this be addressed? How have similar considerations for other types of community facilities been addressed?
267. How does the Plan identify the requirements for greenspace, including public open space and play space, to serve individual housing allocations? What mechanisms exist to ensure that this provision is made and maintained?

Boston

268. The identified Sustainable Urban Extensions (SUE) in Spalding and Holbeach are the subject of Policies 12 and 13, respectively. Are the allocated sites to the west of Boston (Refs Sou006 and Wes002) clearly identified within the Plan as SUE to Boston?
269. In the absence of a site specific policy for sites Sou006 and Wes002, how will the Plan provide for the effective delivery of their development? Are the allocations justified and robust? Have any adverse impacts been identified? How has the effectiveness of these sites for the delivery of housing been assessed?
270. How has the issue of flood risk been assessed in relation to these sites? Are their allocations justified in flood risk terms? How does the evidence demonstrate that they represent sequentially preferable locations for growth?
271. Paragraph 3.2.5 refers to the significant infrastructure needs in relation to major highways improvements and indicates that the levels of growth identified reflect the need to fund this highway infrastructure. Paragraph 3.6.5 refers to the need for a new secondary school to serve the proposed development to the west of Boston. Is the extent and type of infrastructure provision, including green and social infrastructure, required to support the development of these sites clearly identified, justified and sufficiently detailed to provide for their effective delivery?

272. Does the Plan specify when this infrastructure will be required, and how and by whom this will be delivered? If not, how will the provision of the required infrastructure be controlled? What confidence exists that this provision will be delivered in a timely manner, to relate positively to the rate of development on the site?
273. What evidence supports the assessment that delivery of the proposed development would be feasible and viable, including in relation to the provision of affordable housing and infrastructure. Are the priorities for delivery of affordable housing and infrastructure clearly identified and justified? Do the Policies provide sufficient flexibility to respond positively to possible future changes in circumstance or priorities?

Policy 12: Vernatts Sustainable Urban Extension (SUE)

274. How has the issue of flood risk been assessed in relation to the SUE proposal? Is the allocation of the SUE justified in flood risk terms? How does the evidence demonstrate that it represents a sequentially preferable location for growth?
275. Paragraph 5.3.2 of the Plan indicates that the previous aim of avoiding the virtual coalescence of Pinchbeck and Spalding has been dropped for reasons of practicality. Is such an approach justified and will it lead to the effective delivery of development?
276. How would the proposed development impact on the historic environment, including Pinchbeck Conservation Area and potentially significant archaeology? Does the policy clearly identify how development proposals should address potential impact on designated and non-designated heritage assets? Is Policy 12 justified and consistent with national policy in this regard?
277. How is the phased development of the SUE proposed to be managed? How will the series of separate masterplans for the individual phases identified in Policy 12 be prepared and by whom? Does the Policy make it clear by when, and by what process, these masterplans should be agreed?
278. How will the approach for the detailed development of the SUE overall be established, to ensure that the development achieves the aims of Policy 12, including the delivery of a balanced community over its lifetime.
279. Are the identified locations for proposed greenspace justified? Will these locations support the effective delivery of development on the site?
280. Is there an identified need for retail provision on the site, in addition to the proposed provision of community facilities?
281. Does the Policy clearly identify the extent and type of infrastructure provision, including green and social infrastructure, foul and surface water drainage, required to support each phase of the development? Are these requirements justified and sufficiently detailed to support the effective delivery of development? Does the Policy specify when this will be required, and how and

by whom this will be delivered? If not, how will the provision of the required infrastructure be controlled?

282. Is the reference within paragraph 5.3.2 of the Plan to the infrastructure requirements being developed through the Infrastructure Delivery Plan (IDP) and Whole Plan Viability Assessment a sufficiently robust mechanism? What confidence exists that this provision will be delivered in a timely manner, to relate positively to the phased rate of development on the site?
283. What evidence supports the assessment that delivery of the proposed development would be feasible and viable, including in relation to the provision of affordable housing, sewerage and drainage infrastructure, the northern section and part of the central section of the Spalding Western Relief Road (SWRR) and the bridge crossing of the railway line. Are the priorities for delivery of affordable housing and infrastructure clearly identified and justified? Does the Policy provide sufficient flexibility to respond positively to possible future changes in circumstance or priorities?

Policy 13: Holbeach West SUE

284. The Policy refers to the preparation of a masterplan to support the delivery of this site. Does the Policy provide appropriate clarity and certainty about the requirements for the housing allocation, including the extent and type of supporting infrastructure required and its phasing in relation to the development of the site as a whole?
285. How would the proposed development impact on the historic environment, including historic landscape character? Does the policy clearly identify how development proposals should address potential impact on designated and non-designated heritage assets? Is Policy 13 justified and consistent with national policy in this regard?
286. How has the issue of flood risk been assessed in relation to the SUE proposal? Is the allocation of the SUE justified in flood risk terms? How does the evidence demonstrate that it represents a sequentially preferable location for growth? To be effective, should the Policy also refer to the need for foul drainage strategy for the site as a whole and for each phase?
287. How is the phased development of the SUE proposed to be managed? How will the masterplan identified in Policy 13 be prepared and by whom? Does the Policy make it clear by when, and by what process, this masterplan should be agreed?
288. Are the identified locations for proposed greenspace justified? Will these locations support the effective delivery of development on the site?
289. Does the Policy clearly identify the extent and type of infrastructure provision, including green and social infrastructure, foul and surface water drainage, required to support each phase of the development? Are these requirements justified and sufficiently detailed to support the effective delivery of development?

290. Does the Policy specify when this will be required, and how and by whom this will be delivered? If not, how will the provision of the required infrastructure be controlled? What confidence exists that this provision will be delivered in a timely manner, to relate positively to the phased rate of development on the site?
291. What evidence supports the assessment that delivery of the proposed development would be feasible and viable, including in relation to the provision of affordable housing and infrastructure. Are the priorities for delivery of affordable housing and infrastructure clearly identified and justified? Does the Policy provide flexibility to respond positively to possible future changes in circumstance or priorities?

Additional Questions on Matter 9: Housing Allocations

The following points will be discussed at the forthcoming hearing sessions. If the Councils wish to submit a written response before the hearing date, this would be welcomed. References below to the SHLAA are to the South East Lincolnshire Strategic Housing Land Availability Assessment (April 2017) CD/Hsg/018.

Sub Regional Centres

Boston

1. The latest housing trajectories suggests very limited or no direct developer involvement with several of the proposed non-strategic sites, including: Fen001, Fen002, Fis002, Fis003, Nor006, Wyb013; with no recent information in relation to Pil002, Pil006 and Wyb041. What is the basis for the understanding that these sites are likely to come forward for the quantum of development proposed, within the timeframes indicated in the trajectories?
2. Sites Fen002, Fis003, Fis033, Wes001, Wyb013 and Wyb033 have been identified as within Flood Risk Zone 3a, with a hazard of danger for all and depth of 1.0m to 2.0m. Are there other sequentially preferable sites at lower risk of flooding that are available and have not been allocated? If so, why have the proposed allocations been considered preferable to those other sites?
3. Sites Cen001, Fen002, Fis002, Fis003, Pil002, Pil006 and Wyb013 have been identified within the Boston Housing Paper as sites where the Environment Agency have raised concerns about the potential impact of flood risk mitigation measures on viability and no response has been received from the site owners in relation to these concerns. In light of this, what has influenced the JSPC assessment that the development of each of these sites would be achievable?
4. Fen001 – has a survey been undertaken to demonstrate that the issues identified by the Highway Authority with the required junction and road geometry can be addressed?
5. Fen002 – site values are considered to be relatively low, with development and infrastructure costs likely to be high. In light of this and the concerns in relation to

viability and flood risk mitigation above, is the assessment that the development is likely to be viable and achievable realistic?

6. Fen006 – the SHLAA indicates permission has previously been granted for a non-residential scheme on the site and residential development has a poor level of achievability. High levels of infrastructure costs associated with its development are also highlighted, including significant highway works, which may impact on its delivery. Why does the JSPC consider the allocation justified in light of this?
7. Fis002 –has any further assessment been undertaken on the ability to achieve a safe access to the site and any wider implications of the removal of the hedge?
8. Fis038 – how has the wildlife value of the site been assessed? How are the potential impacts of the development of this site on Pink Footed Geese and the Wash SPA proposed to be addressed?
9. Nor006 – how have the requirements identified in the SHLAA, for landscaping and development of a restricted height at the south of the site been addressed in the Plan?
10. Pil006 – how have the potential impacts of development on the setting of nearby heritage assets been considered? How are these proposed to be addressed in the Plan?
11. Wyb013 – the site is identified within the SHLAA as an existing allocation in the 1999 Local Plan. Given it has not been developed to date, what is the basis for considering that the site is likely to be developed in the future, particularly given the relatively high infrastructure costs? Is its identified contribution to housing supply realistic?
12. Wyb041 – the site has been identified within the SHLAA as less accessible to most of the town’s services and facilities than alternative sites. In light of this, why was the site considered suitable for allocation, in preference to those sites?
13. Fis017a – the officer comment to response No 536 received on the public consultation on the SELLP Publication Version (CD/LP/008) indicates that there is an arguable case for a smaller proportion of site Fis017 to be allocated (as site Fis017a). Has this smaller site been the subject of specific assessment and evaluation? Why was this site not allocated?

Spalding

14. The latest housing trajectories suggests limited or no direct developer involvement with several of the proposed non-strategic sites, including: Stm010, Stm028, Mon005 and Mon008; with no recent information in relation to Pin025. What is the basis for the understanding that these sites are likely to come forward for the quantum of development proposed, within the timeframes indicated in the trajectories?
15. Stm010 and Stm028 have been identified within the Spalding Housing Paper as sites where the Environment Agency have raised concerns about the potential impact of flood risk mitigation measures on viability. In light of this and the limited

developer involvement identified above, what has influenced the JSPC assessment that the development of each of these sites would be achievable?

16. Stm004, Stm010, Stm028 – the SHLAA indicates that these sites are not as accessible to existing services and facilities as other sites. Why were these sites considered preferable to other alternative sites? Have the sites been assessed individually or cumulatively? Would the assessment of individual suitability alter if one or more of the other sites did not come forward for development?
17. The Spalding Housing Paper indicates that site Stm004 was considered preferable to alternative sites Stm006 and Stm009, primarily on flood risk grounds. How was the issue of flood risk assessed for these sites? What area was identified for the sequential assessment of flood risk? Are any sites of equal or greater risk of flooding than sites Stm006 and Stm009 proposed to be allocated? If so, what are the reasons for considering those sites preferable to sites Stm006 and Stm009?
18. Mon005 – the site has been assessed in the SHLAA as having moderate achievability, with moderate values and high likely infrastructure costs. The need for improvements to schools, water and the foul sewerage network have been identified within the SHLAA. Has the assessment of viability/ achievability taken into account any financial contribution required to deliver the Spalding Transport Strategy? Are the likely infrastructure requirements for this site clearly identified within the Plan