

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

Post_title: 03: Crowland

ID1: 1158

comment_author: Mr Peter Bird

comment_content:

I am opposing further housing development in Crowland because insufficient concern has been shown for accessing the old A1073 by-pass (now James Road). If this issue is taken care of I would not oppose further housing development.

Officer Comment:

The Highways Authority have identified no adverse impacts relating to the amount of new development proposed for Crowland on the local highway network.

Officer Recommendation:

No change required.

ID1: 1159 comment_author: Gregory Gray Associates

comment content:

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

Policy 12 Distribution of New Housing of the draft Local Plan indicates that new housing site allocations will be made for a total of 380 units in Crowland. Crowland Garden Centre (site CRO38) is identified as a potential housing site to make a contribution of approximately 78 units towards this figure. Our client strongly supports the allocation of Crowland Garden Centre for housing purposes within the emerging Local Plan. It is recognised that the total capacity of the potential housing sites identified for Crowland amounts to 594 units, in excess of the housing figure set out in Policy 12. In the eventuality that the emerging Local Plan only seeks to make allocations to accommodate 380 units, the Planning Authority is requested to take into account the sequentially preferable nature of our client's site. Crowland Garden Centre is located partially within the existing settlement boundary for Crowland as defined within the existing South Holland Local Plan. The site is highly developed, containing a number of buildings with a combined footprint of 6,600 sq.m together with extensive areas of non-permeable hardstanding comprising the plant display area and car parking for 100 cars. The site is well situated in relation to the existing centre of population and the amenities and transport links offered by Crowland. It is provided with suitable access arrangements which serve the existing commercial use and which could facilitate access to other proposed housing sites to the north or east. Furthermore, it benefits from tree screening on its

Officer Comment:

Support for Cro038 is welcome. Cro038 is within the proposed settlement boundary for Crowland and is predominantly brownfield, so its use will have less environmental impact than some other potential housing sites. The SHLAA identifies that Cro038 is accessible to Crowland's existing facilities and services. The Highways Authority identifies that 'access via the existing garden centre and caravan site would be geometrically feasible although the culvert carrying the road over the water course would need to be investigated to see if it suitable for adoption, otherwise a new culvert would be required. The existing separate footbridge would not be acceptable for adoption. This might be extended into Cro031 but not as a sole means of access.' It appears that a satisfactory access could be provided to this site, arrangements for other, alternative sites will be more straight-forward. The SHLAA identifies that 'the eastern boundary has some tree screening which will help prevent the site protruding into the countryside', indicating that visual impacts may be less than for some other sites. The site is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard', similar to all but two potential housing sites, any opportunities to reduce the flood risk should be taken, but that is the same for all other sites. Although the re-use of brownfield land, mitigating flood risk and access to local services are important factors to consider when undertaking site selection, the Sustainability Appraisal does not score site Cro038 as well as some others, in particular with only one positive (green) impact being recorded relating to housing delivery, but five negative/very negative (orange/red) impacts being

Officer Recommendation:

Site Cro038 is not one of the more suitable Potential Housing Sites in Crowland, and it should not be taken forward as Preferred Option Housing Allocation.

eastern edge which serves to provide containment to the site and prevent encroachment into the open countryside beyond. The Flood Risk associated with the site is equivalent to all of the Crowland sites except CRO36 and CRO44, and the existence of significant built development and impermeable surfacing on the site offers an opportunity to reduce the cause and impact of flooding within the local area, an opportunity which para. 100 of the NPPF suggests that Local Authorities should use. In light of all of these factors, Crowland Garden Centre should be considered sequentially preferable to all of the other housing sites proposed for Crowland other than sites CRO36 and 44 which are at lower risk of flooding. Para. 182 of the NPPF requires a Local Plan to be prepared in accordance with the Duty to Cooperate, legal and procedural requirements and to be 'sound'. In order to be considered sound, the plan is required to be positively prepared, justified, effective and consistent with national policy. It is considered that the allocation of Crowland Garden Centre as a future housing site is consistent with the emerging South East Lincolnshire Local Plan being considered '[sound]' by an Inspector at the forthcoming Examination for the following reasons: In order to be 'positively prepared', the plan needs to be based on a strategy which seeks to meet objectively assessed development and infrastructure needs where it is reasonable to do so and consistent with achieving sustainable development. The allocation of the site to provide new housing is proposed in response to the emerging Local Plan's commitment to meet the objectively assessed housing need for the Local Plan area. It provides a sustainable means of meeting this need by reusing previously developed land, potentially mitigating flood impact through a reduction in impermeable surfacing and by siting development in an appropriate location with

recorded including access to community facilities and loss of an employment use. Part of the site lies within a Sand and Gravel Minerals Safeguarding Zone, although mitigation could address any issues identified, this is an issue which does not affect most other sites. Therefore it is considered that an alternative strategy to housing provision may also be justified. Confirmation that there are no barriers to delivery is welcome.

good accessibility to local facilities. As such the Plan can be considered 'positively prepared'. The identification of the site's potential to provide residential development has been based upon the evidence base, in particular a relative assessment of all potential housing sites within the individual settlement's Housing Papers. As such, it is considered that the most appropriate strategy for providing the required additional residential provision has been adopted such that the Plan can be considered 'justified'. There is considered to be no bar to the site being deliverable over the plan period such that the Plan is 'effective'. Finally, the site is currently in commercial use and comprises a highly developed brownfield site which is of low environmental value. Accordingly, its allocation for alternative residential purposes is entirely 'consistent with national policy' which encourages the re-use of such previously developed land. On this basis, it is considered that the allocation of Crowland Garden Centre as a housing site to meet the requirements of Policy 12, is consistent with the emerging Local Plan being considered 'sound' at Examination. I would be grateful if this representation could be taken into consideration as part of the emerging Local Plan process.

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ID1: 1160 comment_author: Mr C J Sharpe

comment content:

Reference Site Cro036: I would like to comment with reference to the notes for Site Cro036: The site additionally benefits from an existing mains gas and electricity supply to an uninhabitable dwelling on the property adjacent to redundant and derelict farm buildings. This site would seem to merit consideration within the Crowland village local plan as appears to meet with a number of the criteria, principals and guidance contained within The National Planning Policy Framework: Planning permissions may be considered : 'where the development would reuse redundant or disused buildings and lead to an enhancement to the immediate setting.' When defining boundaries local planning authorities should: 'not include land which it is unnecessary to keep open should define boundaries clearly using physical features that are readily recognisable and likely to be permanent' In identifying this site The South East Lincolnshire Strategic Land Availability Assessment has recognised the above guidance and the opportunity to provide a significant enhancement to this part of the village.

Officer Comment:

Provision of electricity and gas to part of the site is advantageous, although an upgrade may be required to accommodate additional housing. Development would lead to the re-use of some redundant brownfield land which with an appropriate design could enhance the local setting. Should the site be taken forward for housing it would then be included in the settlement boundary for Crowland.

Officer Recommendation:

No change required.

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ID1: 1161 comment_author: Historic England

comment content:

Crowland Abbey Scheduled Monument and the Grade I listed Crowland Abbey are to the north of the site. At present, the employment site proposed to the south forms part of the long open views which are of particular importance to the setting of both the scheduled monument and the church. It was unclear if the site had been assessed within the Sustainability Appraisal. As such, very strong concerns are raised regarding this site.

Officer Comment:

An initial desktop assessment has been undertaken which indicated that the site could be developed without significant harm to Crowland Abbey. However, further assessment will be undertaken by the LPA's Conservation Officer to determine whether this site can be satisfactorily developed in relation to these heritage assets.

Officer Recommendation:

Conservation Officer to undertake site assessment to determine whether Thorney Road should be taken forward as an employment site.

ID1: 1162 comment_author: Crowland Parish Council

comment content:

Members were all fully supportive of the proposed industrial development areas.
Members were all fully supportive of the development of field numbers - 36, 17, 2, 11 & 44 BUT Field number 45 was not supported by any members as they feel it would be better used to expand the educational facilities because, as South Holland grows, there will be a requirement for a secondary school education facility which could be developed on this site.
Field numbers 38 & 41 members did not support proposed housing and would prefer these to remain as retail/commercial for employment purposes.
Members agree with the proposed 380 houses.
Members were disappointed that there is no provision within the report for improvement to dangerous junctions on James Road and on the A16.
We would be most grateful if you would consider our comments within your consultation.

Officer Comment:

Support for the employment sites is welcome. Support for Cro036, Cro017, Cro002, Cro011 and Cro044 is welcome. The County Education Authority comment that there are no plans to provide a secondary school on Cro045, and consider that the existing secondary schools have capacity to expand within their current boundaries. Retaining Cro038 and Cro041 as commercial use is noted. Support for the housing requirement of 380 homes is noted. The Highways Authority have considered the impacts of traffic generated by each potential site in Crowland, individually and cumulatively and consider at this stage there is no need for significant highways works on James Road or on the A16 that would require identification in the Local Plan.

Officer Recommendation:

It is considered that the employment sites should be taken forward as Preferred Sites. Sites Cro002, Cro011, Cro017, Cro036, Cro044 and Cro045 are some of the more suitable Potential Housing Sites in Crowland, and they should be taken forward as Preferred

ID1: 1163 comment_author: Vinci Mouchel Ltd

comment content:

Crowland South View Primary School, Reform Street, Crowland “ the site of the school buildings comprising some 0.683ha is considered suitable for housing and presently the old school buildings are being cleared in preparation for future development. It is an undoubted residential development opportunity. The remote playing field is unlikely to see development in the short term but the owner of the site to the east is seeking consent for housing and this may afford some potential subject to overcoming the issues around securing Section 77 consent and the disposal of school playing fields. Accordingly it is our view that both sites should be considered appropriate for housing allocation and would represent a significant and valuable contribution to meeting local housing need in the area. The development of the site could also provide a significant provision of affordable homes in accordance with the requirements of proposed Policy 15: Affordable Housing and developer contribution in accordance with proposed Policy 6: Developer Contributions. The overall site area is about 0.76ha.

Officer Comment:

This has been registered as Cro046 & Cro047 in the SHLAA.

Cro046 - South View Community Primary School, Broadway, Crowland. The SHLAA identifies this site as developable. The Highways Authority identifies that ‘this site is large enough to accommodate the proposed 14 dwellings with a variety of access options available – either directly as individual dwellings or as adoptable or private roads off any of the three roads onto which the site has frontages. Sufficient off-street parking for residents and visitors would therefore be required on the site.

Cro047 - Playing field, east of Chapel Street, Crowland. The SHLAA identifies this site as being undevelopable because it would lead to the loss of a playing field and does not have highways access. Provision of affordable housing and other developer contributions through these new developments is welcome.

Officer Recommendation:

Site Cro046 is one of the more suitable Potential Housing Sites in Crowland, and it should be taken forward as Preferred Option Housing Allocation. Site Cro047 is one of the more unsuitable Potential Housing Sites in Crowland, and it should not be taken forward as Preferred Option Housing Allocation.

ID1: 1164 comment_author: Longstaffs

comment content:

Overall, on behalf of our client, we are disappointed to note that site Cro034 has not been selected as a Potential Housing site. The site is in scale with the 380 dwellings which the emerging Local Plan seeks to be developed in Crowland. It has been highlighted in the SHLAA 2016 assessment that:

1. It will not have adverse impacts on natural, built or historic assets.
2. It does not lead to the loss of existing infrastructure, such as open space, green infrastructure or community facilities.
3. The site is relatively close to Crowland's centre, although it is separated from it by James Road. It does however fall within the defining boundary of the settlement created by the A16 Bypass, which means that it is accessible to the majority of the town's services and facilities.
4. Services and facilities are accessible by foot, bicycle and within walking distance of public transport locations.
5. It has good highways access, and whilst it is in Flood Zone 3a, this is the same for several other sites in Crowland and indeed the South Holland area, including the main Sub Regional centres. Based on the fact that flood risk, whilst is a factor to be considered, is so relevant for so many sites, we believe this sites sustainable location, give good merit to site Cro034 being considered a suitable site, and if developed with other adjacent sites would provide a spread of new housing development across the town, to suit the carrying locational aspirations of homeowners. We put forward that it should be considered as a Potential Housing site for the settlement of Crowland.

Officer Comment:

The site has a capacity of 9 dwellings at 20dph so could contribute to the 380 target for Crowland. The PPG makes it clear that an "assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs." However the SHLAA identifies that Cro034 'is relatively close to Crowland's centre, it is separated from it by James Road which means that it is not as accessible to the majority of the town's services and facilities as sites on the northern side of James Road. It is also located away from Crowland's built up area (defined settlement limit)' and that 'services and facilities are poorly accessible by foot, bicycle and public transport', therefore the objector's statement is not accepted. Site Cro034 is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard' one of the least sequentially preferable sites in Crowland. The SHLAA identifies the site as 'undevelopable', similar to all the other sites in the Barbers Drove location. The landowners of the other sites in this location have not indicated that they would be willing for the sites to be considered together.

Officer Recommendation:

No change required.

ID1: 1165 comment_author: Longstaffs

comment content:

Overall, on behalf of our client, we are disappointed to note that site Cro033 has not been selected as a 'Potential Housing site'. The site is in scale with the 380 dwellings which the emerging Local Plan seeks to be developed in Crowland. It has been highlighted in the SHLAA 2016 assessment that:

1. It will not have adverse impacts on natural, built or historic assets.
2. It does not lead to the loss of existing infrastructure, such as open space, green infrastructure or community facilities.
3. The site is relatively close to Crowland's centre, although it is separated from it by James Road. It does however fall within the defining boundary of the settlement created by the A16 Bypass, which means that it is accessible to the majority of the town's services and facilities.
4. Services and facilities are accessible by foot, bicycle and within walking distance of public transport locations.
5. It has good highways access, and whilst it is in Flood Zone 3a, this is the same for several other sites in Crowland and indeed the South Holland area, including the main Sub Regional centres. Based on the fact that flood risk, whilst is a factor to be considered, is so relevant for so many sites, we believe this site's sustainable location, give good merit to site Cro033 being considered a suitable site, and we put forward that it should be considered as a 'Potential Housing site' for the settlement of Crowland.

Officer Comment:

The site has a capacity of 42 dwellings at 20dph so could contribute to the 380 target for Crowland. The PPG makes it clear that an "assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs." The SHLAA identifies that Cro032 'is relatively close to Crowland's centre, it is separated from it by James Road which means that it is not as accessible to the majority of the town's services and facilities as sites on the northern side of James Road. It is also located away from Crowland's built up area (defined settlement limit)'. The SHLAA identifies that 'services and facilities are poorly accessible by foot, bicycle and public transport', therefore the objector's statement is not accepted. Site Cro032 is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard' one of the least sequentially preferable sites in Crowland.

Officer Recommendation:

No change required.

ID1: 1166 comment_author: Longstaffs

comment content:

Overall, on behalf of our client, we are disappointed to note that site Cro032 has not been selected as a 'Potential Housing site'. The site is in scale with the 380 dwellings which the emerging Local Plan seeks to be developed in Crowland. It has been highlighted in the SHLAA 2016 assessment that:

1. It will not have adverse impacts on natural, built or historic assets.
2. It does not lead to the loss of existing infrastructure, such as open space, green infrastructure or community facilities.
3. The site is relatively close to Crowland's centre, although it is separated from it by James Road. It does however fall within the defining boundary of the settlement created by the A16 Bypass, which means that it is accessible to the majority of the town's services and facilities.
4. Services and facilities are accessible by foot, bicycle and within walking distance of public transport locations.
5. It completes a development which would be in an area of poor agricultural use following the poor shaped fields resulting from the Bypass routing. It has good highways access, and whilst it is in Flood Zone 3a, this is the same for several other sites in Crowland and indeed the South Holland area, including the main Sub Regional centres. Based on the fact that flood risk, whilst is a factor to be considered, is so relevant for so many sites, we believe this site's sustainable location, give good merit to site Cro032 being considered a suitable site, and we put forward that it should be considered as a Potential Housing site for the settlement of Crowland.

Officer Comment:

The site has a capacity of 116 dwellings at 20dph so could contribute to the 380 target for Crowland. The PPG makes it clear that an "assessment is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs." The SHLAA identifies that Cro032 'is relatively close to Crowland's centre, it is separated from it by James Road which means that it is not as accessible to the majority of the town's services and facilities as sites on the northern side of James Road. It is also located away from Crowland's built up area (defined settlement limit)' and that 'services and facilities are poorly accessible by foot, bicycle and public transport', therefore the objector's statement is not accepted. The site would involve the loss of 5.8ha of Grade 2 agricultural land. So it is not accepted that the area has poor agricultural use. Site Cro032 is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard' one of the least sequentially preferable sites in Crowland

Officer Recommendation:

No change required.

ID1: 1167 comment_author: Longstaffs

comment content:

Overall, on behalf of our client, we very much support the proposal to include site Cro017. It completes a development adjacent to other recently consented residential development, has good highways access, and whilst it is in Flood Zone 3a, this is the same for several other settlements around Crowland and indeed the South Holland area, including the main Sub Regional centres. Based on the fact that flood risk, whilst is a factor to be considered, is so relevant for so many sites, we believe this site's sustainable location, and the fact that a developer has indicated an interest in progressing an Outline Residential planning application on the site, give good merit to site Cro017 being considered a very suitable site, and we agree it has been correctly identified as a 'Potential Housing site' for the settlement of Crowland. We look forward to receiving an acknowledgment of this response, and to receiving a copy of any revisions to the Local Plan policies and Settlement proposals in due course.

Officer Comment:

Support for this potential housing site is noted. Site Cro010 adjoining the site to the east is being built out and would help integrate Site Cro017 with the Crowland built area. The Highways Authority identifies that 'services and facilities are accessible by foot, bicycle and public transport. Access from Cro010 or James Road would be suitable'. The site is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard', similar to all but two potential housing sites. The owners intent to progress a planning application is noted.

Officer Recommendation:

Site Cro017 is one of the more suitable Potential Housing Sites in Crowland, and it should be taken forward as Preferred Option Housing Allocation.

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ID1:

1168

comment_author:

Robert Doughty Consultancy Ltd

comment content:

Inset Map 3: Crowland The Inset Plan for Crowland identifies several potential allocations in Crowland, all to the north of the town and all in Flood Zone 3a, in advance of the Level 2 SFRA. All the allocations require infrastructure improvements. Our client's land interests centre around Crease Drove to the south west of the town centre and all are immediately adjacent to the existing settlement boundary and adjoin existing residential areas. The interests are effectively split in two, either side of Crease Drove and these are identified on the attached location plan and masterplan showing how the sites could be developed. Some, but not all of the land has been the subject of SHLAA representations. The northern part of that area to the north west of Crease Drove is identified as Cro018. The subject land to the south east of Crease Drove was not the subject of a SHLAA representation. The land to the north west of Crease Drove measures 3.4 ha and is capable of accommodating approximately 100 at 30 dpha. The land to the south east of Crease Drove measures 3.5 ha and is capable of accommodating 75 dwellings which is discounted based on the need to include a noise attenuation buffer zone. All the SHLAA proposals off Crease Drove have been discounted due to the perceived impact from Crowland Cranes and the need to improve Crease Drove. The SHLAA commentary, however, suggests that the development of Crease Drove would be unlikely to fund the necessary improvements to Harvester Way. No assessment has been made by the Local Plan team of the actual impact of Crowland Cranes in terms of noise impact and no assessment of the necessary work to Crease Drove (Harvester Way is quite suitable) has

Officer Comment:

All of the potential housing sites will require infrastructure provision, although some are more significant than others. The location of the revised Cro018 and the new site are noted. However, the SHLAA identifies that for Crowland the preferred density is 20 dwellings to the hectare; Cro018 would be 68 dwellings rather than 100, and the new site would be 70 dwellings. It is accepted that the SHLAA makes reference to improvements required to Crease Drove, and the potential amenity concerns relating to the nearby employment site. It is also acknowledged that no assessment relating to noise or highways has been undertaken. The SHLAA identifies the site as in close proximity to employment land. SHDC Environmental Health consider that even with mitigation there is no certainty that the amenity of future residents would not be adversely affected, which could impact upon the type and extent of development delivered in the Crease Drove employment area. The SHLAA identifies the cranes on the existing employment site as creating a potential adverse visual impact for future. It is accepted that landscaping could help minimise this impact. However, these are issues which do not affect the Potential Housing Sites to the same extent. Mixed use development can be an appropriate planning mechanism to create sustainable communities but equally there are benefits to promoting separate employment areas where there is a possibility that the amenity of future residents can be adversely affected. The ability for the development to provide for necessary highways improvements is noted. Site Cro018 is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no

Officer Recommendation:

No change required.

been undertaken. We have carried out an assessment of the noise impact generated by the operation of Crowland Cranes and the initial findings are presented as part of this representation. The conclusion is that with appropriate attenuation, the noise can be satisfactorily mitigated on both sites. The views of cranes on the site is not a sufficiently robust reason in planning terms to not allocate land for development, this is especially so when considering the fact that there are relatively few cranes on site at any one time and that these views will only be visible to a few dwellings and with appropriate landscaping these views will in time disappear. There is no good reason in planning terms that with the appropriate mitigation why residential development cannot sit comfortably next to existing employment activities. Moreover, there are indeed sound planning reasons to suggest that mixed use development is more sustainable than segregating employment provision at the southern end of the town from new residential allocations to the extreme north. There is the necessary control over land to enable the upgrading of Crease Drove or for that matter closing Crease Drove and re-routing it through the proposed development land and away from Crowland Cranes. In the absence of any ransom situation, the necessary road improvements can be funded by the proposed development.

The majority of Cro016 lies within Flood Zone 2 and is therefore sequentially preferable to any other land adjacent to the settlement boundary. The potential sites for housing to the north of the settlement identified on the Inset Map are all located within Flood Zone 3a. Development in the Crease Drove area is well related to the settlement and has development on most sides resulting in little or no impact on the wider character of the area. Development here would form a

hazard' one of the least sequentially preferable sites in Crowland. The new site is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard'. The SHLAA identifies that Cro018 is accessible to Crowland's existing services and facilities and is located adjacent to Crowland's existing built-up area (defined settlement limit). The SHLAA identifies that the opening-up costs for Cro036 are likely to be low and the promoter has not challenged this position with relation to highways.

logical extension to the town.

Cro036 This is a relatively small site, the development of which is recognised as requiring the significant improvement of Low Road. There is no identification as to whether this is financially viable or achievable within land maintained at public expense and yet the land is identified as a potential housing site.

Cro016 was ruled out as part of the SHLAA process on similar highway grounds.

Cro045 The site lies within Flood Zone 3a and requires infrastructure improvements to enable it to come forward, the scale and cost of these are largely unknown and yet the site is listed as a potential site for development.

Cro031 This site lies within Flood Zone 3a and requires road improvements to Clout Drove and there is no indication whether this is achievable. The development would extend the town northwards into open countryside.

Cro041 The site lies within Flood Zone 3a and would require either a link through from Cro031 or Cro038. There is no guarantee that this site would therefore come forward especially as Cro038 is an existing employment site and access from Cro031 might be ransomed. The access to Cro038 needs significant improvement. The site lies on the outer northern edge of the settlement and is not well connected to the town centre.

Cro038 The site lies in Flood Zone 3a, is an existing employment site and the existing access needs improving. There is also filled ground on the site. The site is on the northern edge of the settlement and is not well connected to the town centre.

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ID1:

1169

comment_author:

Robert Doughty Consultancy Ltd

comment content:

Please see our initial appraisal below, which is based on noise data from continuous noise logging measurements made at Locations 1-4, and attended short term sample measurements at Location 5 (measurement locations indicated in Figure 1). Measurements were taken during the morning hours of 11 February 2016, under calm and dry weather conditions. NB. We have also undertaken measurements during late evening and early morning hours, but traffic noise during those times was relatively low, and there was no operation at nearby industrial premises. Therefore, the late morning data is of greater relevance to the proposed development. The noise survey data for the LA99 and LA90 parameters at the logging positions are presented in the charts below. The prevailing noise source across the site is from local and distant road traffic. This is primarily from the A16, but there is also frequent passing traffic along Crease Drove. There is also notable noise generated by Crowland Cranes, which essentially comprises two elements: night-time noise from wheeled cranes leaving the site between approximately 0500-0700 hours, and daytime machine/process noise that is clearly audible at the site (this noise appears to emanate from the buildings to the south of the Crowland Cranes site). The mobile cranes potentially return later in the day, but noise impact from this will be no worse than that during the more sensitive nighttime period. All commercial vehicles enter and exit the Crowland Cranes site from the south via Crease Drove and Harvester Way. There was no significant noise emission observed from the other nearby commercial/industrial premises. From initial appraisal

Officer Comment:

Submission of a noise assessment is noted. SHDC Environmental Health consider that even with mitigation there is no certainty that the amenity of future residents would not be adversely affected, which could impact upon the type and extent of development delivered in the Crease Drove employment area. Therefore Site Cro018 is not one of the more suitable Potential Housing Sites in Crowland, and it should not be taken forward as Preferred Option Housing Allocation.

Officer Recommendation:

No change required.

of the survey data with regard to BS4142:2014, the Rating Level of the wheeled cranes is between 10-15dB above the nighttime background noise level, and the process noise is around 10dB above the daytime background noise level. This margin of impact is defined in the standard as indication of a significant adverse impact, and therefore mitigation is required to reduce impact upon proposed residential properties. As can be seen from the measurement data, the actual magnitude of noise levels is relatively low, and therefore suitable sound insulation of new dwellings can be incorporated into the building design and specification. Nonetheless, some mitigation will also be needed to reduce the BS4142 Rating Level. This is likely most easily achieved by a combination of an acoustic barrier and a buffer separation zone. Initial assessment indicates that provision of barriers and buffer zone as indicated in Figure 1 below should be sufficient to reduce the Crowland Cranes noise such that the difference between Rating Level and background noise is around 0dB, which represents a low impact.

ID1:

1170

comment_author: Woods Hardwick Planning Ltd

comment content:

It is assumed that the sites identified are based on the outcomes of the Strategic Housing Land Availability Assessment (SHLAA) that has been carried out on all of the sites submitted for allocation in the respective settlements. With regard to Crowland, we would submit the following comments in respect of Site Cro14 known as Land to the west of Harvester Way, Crowland. We submit that this site should be allocated for development. The assessment concludes that the site is unsuitable for development. The assessment makes the following comments: - That the site would not have any adverse impacts upon natural, built or historic assets; - It would not lead to the loss of existing infrastructure such as open space, green infrastructure or community facilities; - It is accessible to Crowland's existing services and facilities and is located near to Crowland's existing built up area (defined settlement limit). These are all accessible by foot, bicycle and public transport. - The replacement of the previously identified employment use would be accommodated elsewhere as there is sufficient employment land allocated in South East Lincolnshire. The only issue that has been raised is that of Harvester Way, which is stated as having been constructed to serve employment land to the west. The assessment states that the site may not offer a satisfactory residential environment as the employment land to the west and related traffic may impact upon amenities of new dwellings on the site. There is no firm evidence to substantiate this negative assessment and the use of the term 'may' shows that this is a supposition that is not based on a factual assessment. In point of fact, the site is subject of a current planning application, which is

Officer Comment:

The PPG makes it clear that a SHLAA 'is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.' Therefore the SHLAA is one of the evidence base documents that helped determine that Cro014 is considered to be undevelopable. It is accepted that the SHLAA identifies no adverse impacts upon natural, built or historic assets, no loss of existing infrastructure, and states that the site is accessible to existing facilities by a range of transport. The Employment Land Technical Paper (January 2016) identifies that Harvester Way should be 'de-allocated because it has attracted little interest from the market for employment use partly because it is adjacent to a residential area which would limit the type and extent of employment activity that could be approved and its hours of operation'. In this case, there would be no need to replace the employment land provision elsewhere as the Employment Land Technical Paper (January 2016) identifies that there is an oversupply of employment land in South East Lincolnshire to meet local needs. SHDC Environmental Health consider that even with mitigation there is no certainty that the amenity of future residents would not be adversely affected, which could impact upon the type and extent of development delivered in the Crease Drove employment area. This is

Officer Recommendation:

No change required.

supported by a noise assessment which demonstrates that this issue can be adequately mitigated. Harvester Way already extends past existing residential development and this particular site will be no different. It is therefore submitted that the site should be determined as being suitable for development and therefore allocated within the Plan. Unlike the sites that have been considered as being suitable, there is a developer on board and there are no significant infrastructure barriers to the site coming forward for development in the near future. It also is better related to the settlement and does not extend the built up area of Crowland in the same way that other sites do.

an issue which does not affect the Potential Housing Sites. The Local Highways Authority identifies that the site is accessible by foot, bicycle and public transport. Various assessments have been submitted for consideration as part of the planning application, but the South Holland Planning Committee refused to grant planning permission for this site because 'insufficient information was submitted to enable a clear conclusion to be drawn on the acceptability of residential development being permitted in such close proximity to the existing businesses and vacant allocated employment land directly to the west of the site. It is considered that to be able to grant permission for residential development in this location that full details are required to provide clear evidence as to how the number of properties, their layout and design has taken into account the inter-relationship with the adjacent commercial uses and what, if any, mitigation measures are required to ensure no significant and demonstrable adverse impacts upon either future residents or existing and future businesses. As such, on the basis of the application as submitted, it is not possible to determine whether the presumption in favour of sustainable development, as enshrined in the National Planning Policy Framework, 2012 applies. In particular paragraph 58 of the Framework, requires developments to function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development and paragraph 123 recognises that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of the changes in nearby land uses since they were established. There is currently insufficient information to determine whether residential development of up to 100 dwellings in this

location is in accordance with these elements of the Framework, and as such it is not possible to determine whether the principle of development is acceptable at this point. On this basis the only conclusion can be to refuse the application as submitted'. The Local Plan should select sites for allocation that are considered to be developable; the refusal of planning permission indicates that this is not the case, therefore it is appropriate to take forward other sites where there is a greater likelihood of planning permission being secured, thereby providing more certainty with delivery. It is noted that there is developer interest and that the SHLAA identifies that 'opening up infrastructure costs are likely to be low'. The SHLAA also identifies that Cro014 'is located near to Crowland's existing built up area.'

ID1: 1171 comment_author: Barton Willmore

comment content:

Abbey Developments are promoting parcel Cro045 as identified on Inset Map No 3 Crowland (Appendix 1). The site is situated west of Cloot Drove, adjacent to Normanton Road and Burghley Close. This site is off Kemp Street/Foreman Way which was also an Abbey Development. The developable area is approximately 5ha excluding Public Open Space provision and has been calculated to accommodate approximately 125 units. The site is situated within walking distance to main services including supermarket, schools, health centre and places of worship. A Site Location Plan is provided at Appendix 2.

CAPACITY AND HOUSING

The site is capable of delivering variety in built form, tenure and affordability to suitably address in part the housing need. Furthermore, the development can provide a high quality, sustainable, resilient and socially inclusive community. The site is also capable of delivering the public open space requirements. This can offer a recreational space which would also be within the catchment area of the adjoining residential parcels. FLOOD RISK The site falls within Flood Zone 3a, however, surveys conclude that appropriate mitigation is possible to reduce the risk of flooding to the development and periphery residential parcels. The strategy has been discussed with the IDB and Lincolnshire County Council and the scheme has been agreed in principle.

ECOLOGY, LANDSCAPE AND LAND QUALITY

Preliminary investigations conclude that the site in its current form is of low ecological value. The development of the Site therefore provides an opportunity to enhance biodiversity value and habitat

Officer Comment:

The site can accommodate 102 dwellings, rather than 125) at 20 dph the preferred density for housing sites in Crowland. The SHLAA identifies that Cro045 is accessible to Crowland's existing services and facilities'. The size of the site indicates that a good design should be able to provide a mix of housing types and tenures and the public open space requirement. The site is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard', similar to all but two potential housing sites. A Flood Risk Assessment will need to be approved by the Environment Agency, the Lead Local Flood Authority and IDB to determine whether flood risk can be appropriately managed. The SHLAA identifies that there are no known biodiversity designations nearby. The proposal to enhance the biodiversity value of the site and the wider area is welcome. The SHLAA identifies that 'the site will extend the settlement into the countryside to the north from Foreman Way and beyond the school' (although impacts can be reduced by site layout, landscaping and use of green infrastructure) so provision of landscaping would be beneficial. Cro045 is Grade 2 agricultural land. The site is within 590m of a local shop and the Highways Authority identifies that 'services and facilities are accessible by foot, bicycle and public transport'. The primary school adjoins the southern boundary of the site. The SA identifies that there is a bus stop within 670m of the site. The SHLAA identifies that there are no national or locally designated heritage assets on the site or nearby, and the site will not have any adverse impact upon the setting of any heritage assets. Confirmation of masterplanning, availability and deliverability is welcome.

Officer Recommendation:

Site Cro045 is one of the more suitable Potential Housing Sites in Crowland, and it should be taken forward as Preferred Option Housing Allocation.

connectivity, through the incorporation of new green infrastructure, and provides an opportunity for new pedestrian connectivity between Clout Drove and the public rights of way to the west. Furthermore, through the incorporation of landscape structure along the northern edge of the Site, the development presents an opportunity to provide a soft, robust northern edge to the settlement of Crowland, integrating development on the Site with the existing urban edge, filtering views from the northern approach into Crowland. Provisional mapping illustrates that land within the redline boundary is Grade 2 quality, however this will be confirmed by a detailed Agricultural Land Classification (ALC) survey which is currently being commissioned and undertaken.

ACCESSIBILITY

The site is situated approximately 600 metres north of the local centre and is adjacent to the St. Guthlac's County Secondary School. As Identified above, the local centre includes a range of services and facilities. The proximity to the nearest bus stop and permeability within the site could potentially reduce the need to rely on the private vehicle and contribute to positive health and well-being in Crowland and replicate the existing car dependency patterns. Furthermore, it has been identified that the bus routes service larger service centres optimising public transport methods for residents.

ARCHAEOLOGY AND HERITAGE

There are no designated or non-designated archaeological or heritage assets on the site and surrounding land is of low archaeological significance. Whilst there are not any listed buildings or a Conservation Areas in influencing proximity there is an opportunity to explore views in and out of the site and incorporate visual links to Crowland Abbey.

DELIVERABILITY AND IMPLEMENTATION

Abbey Developments are currently Masterplanning the development parcel in adherence to data from advanced surveys and assessments. Abbey Developments are committed to this development and are confident that this development parcel can be achieved within the plan period. Furthermore, it is considered that the development can be brought forward at the earliest opportunity.

CONCLUSIONS

Parcel Cro045 alone is capable of delivering a high quality, sustainable, resilient and socially inclusive community. The scheme is capable of adhering to draft Policy 14 and 15 through delivering varying typologies and tenure. The site is currently addressing the climate change through a flood mitigation strategy and high quality design and in accordance with draft Policy 28 and 29.

ID1: 1172 comment_author: iba planning

comment content:

My client objects to the Plan as presently drafted as far as it relates to Crowland. The potential housing sites for Crowland are shown on draft Inset Map 3. However, not all those sites submitted for consideration as part of the earlier SHLAA process are identified on the draft Inset Map and this necessarily limits the local community's engagement (and views) as to the suitability of these sites as well as those presently shown. South Holland District Council is currently considering an outline application for approximately 100 houses on land off Harvester Way yet this site (which is presently identified as a Major Employment Proposal with planning permission as at 1 April 2004 on the Proposals Map comprising the adopted South Holland Local Plan 2006) is neither identified nor proposed as a 'potential housing site' despite significant investment by developers to bring this land forward for housing. In addition, South Holland District Council has already consented to a Prior Notification for Demolition of the former potato warehouse on Crease Drove, Crowland in readiness for, by the agent's own admission, a more suitable future use i.e. Housing! Notwithstanding the above, this site is also not identified as a 'potential housing site' on the draft Proposals Map despite it already falling within the settlement boundary and other similar sites (i.e. Within the settlement boundary) being identified for consideration as 'potential housing sites' as part of this consultation stage. This point is particularly pertinent given the proposed expansion to the north of the existing employment site on Crease Drove as indicated on the same draft Inset Map 3, since this makes the logic of expanding the existing Business Park to the

Officer Comment:

The PPG makes it clear that a SHLAA 'is an important evidence source to inform plan making but does not in itself determine whether a site should be allocated for development. This is because not all sites considered in the assessment will be suitable for development (e.g. because of policy constraints or if they are unviable). It is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs.' The SHLAA was also available alongside the Local Plan for comment. Only developable potential housing sites and commitments were identified on the Policies Map. Although a planning application can demonstrate availability of a site, sites awaiting determination are not identified, as permission may not be granted. Issuing a Prior Notification for Demolition does not mean that a site will be granted planning permission. Cro043 is not identified as a Potential Housing Site because of the site's proximity to the Crease Drove employment area. The other potential sites within the settlement boundary are not affected by the same issue. The potential impact of allocating additional employment land in this location will be revisited to consider impacts upon residential amenity. The purpose of the SHLAA is to assess each site individually. The SHLAA process cannot assume that sites are to be developed together unless landowners indicate that they are willing for their sites to be considered as one. This has not happened in relation to the Crease Drove sites. The positive SHLAA issues are not disputed. Cro012 is approximately 45m from the existing boundary of Crease Drove Business Park,

Officer Recommendation:

Re-assess the proposed employment site to the north of Crease Drove Business Park relating to impact upon residential amenity and highways.

north in the direction of this site, the settlement boundary and nearby houses (as is presently proposed) highly questionable. The proposed employment site to the north of Crowland Cranes should therefore be deleted and re-allocated elsewhere. South Holland District Council will be aware that a number of individual (local) landowners had put forward their respective land at Crease Drove for consideration as future housing land through the earlier SHLAA process. The SHLAA considered the logic and suitability of these sites individually (rather than collectively). In respect of my client's site (SHLAA ref Cro012), the SHLAA confirmed positively: - there are no known legal or ownership problems; - opening "up infrastructure costs are likely to be low; - if it is to be allocated, there is a reasonable prospect that it would be developed; - it will not have adverse impacts on natural, built or historic assets; - it will not lead to the loss of existing infrastructure such as open space, green infrastructure or community facilities; - it is accessible to Crowland's existing services and facilities and is located near to Crowland's existing built-up area (defined settlement limit); - the site relates well to the existing town and because it abuts residential to the east and an employment site to the north (also submitted for redevelopment); and - services and facilities are accessible by foot, bicycle and public transport. However, issues relating to proximity to the settlement boundary, proximity to neighbouring employment uses and the need to upgrade Crease Drove being the principal reasons why some or all of these sites were, on an individual basis, either considered not suitable or not developable/deliverable. Dealing with the above issues, the view of Crowland Cranes would not be materially different from my client's site to that from the adjoining former potato warehouse, or indeed from

whereas Cro043 is approximately 125m from the business park, therefore it can be assumed that Cro012 is more likely to experience adverse amenity and visual impacts than Cro043 and from those properties within the settlement boundary. It is not accepted that Cro012 is not materially closer to Crowland Cranes than existing residential properties; at the nearest point Cro012 is 45m from the employment site, whereas existing properties are 200m away. It can be assumed that any adverse amenity impact generated by noise would be materially different. Although a noise impact assessment has been undertaken for Cro014, the outline planning application for that site has been refused on amenity grounds. SHDC Environmental Health consider that even with mitigation there is no certainty that the amenity of future residents would not be adversely affected, which could impact upon the type and extent of development delivered in the Crease Drove employment area. The SHLAA identifies that there are sufficient developable sites in Crowland to meet the housing target that are more straightforward to deliver than those in the Crease Drove area. Improving Crease Drove is not identified as a strategic infrastructure priority, therefore it would only be required as a consequence of new development. In such circumstances the Local Plan does not need to provide a mechanism to deliver highways improvements unless the associated housing sites were the 'preferred sites' which they are not. It is not accepted that the approach taken is unsound: the site selection process is robust, based on up to date evidence, and transparent and has identified sufficient potential developable sites to meet the housing target for Crowland in a sustainable manner. The sites selected form an appropriate strategy, based on the evidence available, are deliverable and are consistent with national policy.

any of those existing residential properties at the edge of the current settlement boundary. This in itself cannot therefore be considered to give rise to an unsatisfactory residential environment. Similarly, the proximity of my client's land is not materially any closer to Crowland Cranes than existing residential properties such as to conclude site Cro012 would not be suitable for housing development on noise/amenity grounds. Indeed, the application presently under consideration along Harvester Way (which is much closer to Crowland Cranes) has recently carried out a Noise Impact Assessment to confirm the suitability of that site for housing development. The Council clearly has an opportunity, via the forward planning process, to consider the land between Crowland Cranes and the settlement boundary for housing and their collective ability to fund the requirement for any necessary widening of the carriageway to Crease Drove (as referred to in the SHLAA conclusions) either as part of a single comprehensive development, or as a suite of mutually compatible individual developments which contribute individually but proportionately towards the overall highway improvement works. The failure to consider the individual SHLAA sites collectively (and in particular their ability, in combination, to fund the necessary infrastructure improvements) is regarded as a significant failing of the present draft. For this reason, the draft Plan cannot be regarded as having been prepared 'positively' or being 'effective', both critical in meeting the tests of soundness as required for ultimate adoption. The identification of some or all of the residual land identified above might then enable the Crease Drove Business Park to be incorporated within the settlement boundary rather than appearing as an isolated satellite allocation, thereby marking a clear distinction between the built-up area and the

Crease Drove Business Park, like many other employment sites in the Plan area, is separate from the built-up area and sits well in the local landscape. There is a clear distinction between the edge of the Business Park and the countryside, as there is between the edge of Crowland and the countryside. Given its use it is appropriate for the site to be slightly separate from the main built up area. Any investment by a landowner and/or developer in the planning process is at their own risk. Although submitting an outline planning application for Cro012 can help demonstrate deliverability, it does not necessarily mean that delivery is imminent, particularly if it is an outline planning application, and in this case planning permission has been refused. While it is welcome that the agent confirms the ability of Cro012 to be able to deliver highways improvements, it would be for the agents/landowners of the other sites to confirm that such provision could be made as part of a viable scheme, which they have not.

countryside beyond. In the absence of South Holland District Council being able to demonstrate a five-year housing land supply, my client has recently invested (significantly) in the preparation of an outline planning application seeking the principle of residential development on her land this is due to be submitted imminently. As part of this process, the application has been informed (and will be supported) by, among others: a Landscape and Visual Appraisal; a Transport Statement; and a Noise Impact Assessment. All reports confirm the suitability of the site to accommodate proposed housing (subject to appropriate mitigation) all such reports can be provided to the Forward Planning team if necessary on request. The above confirms the landowner's willingness (and ability) to bring this site forward for housing during the early part of the Plan period. Housing supply is of course a key consideration for all local authorities in the light of persistent under-delivery over the years, the shortage of affordable housing and the clear advice of national planning policy. In addition, my client is aware of adjoining landowners also being similarly willing to invest in an appropriate outline planning application(s) seeking the principle of residential development on their land. With this in mind, the ability of the collective 'potential housing sites' along Crease Drove (including that presently under consideration along Harvester Way which will also no doubt require similar improvement works along Harvester Way and Crease Drove) to fund any necessary road widening is of course entirely feasible and deliverable. In conclusion, my client's site is considered to be eminently suitable and immediately available as a potential housing site, either individually, or in combination with adjoining land (as part of a larger comprehensive development). To remedy the above objection at this stage: - a further consultation

round is required including my client's site (Cro012), the adjacent former potato warehouse site, the application site currently under consideration along Harvester Way and the residual land along Crease Drove as 'potential housing sites' in order that the local community is able to consider the merits of these sites individually, or collectively, in addition to (or in preference to) those other sites currently identified in the draft consultation documents; and - the proposed employment site to the north of Crowland Cranes should therefore be deleted and re-allocated elsewhere. In the absence of the above amendments, my client's objection to the draft Plan will remain on the basis that, for the above reasons, the Plan cannot be considered to have been prepared positively, is neither justified nor effective, and does not comply with national planning policy in connection with the same thereby collectively failing to meet the tests of soundness. 1 LPA reference: H02-1087-14 2 LPA reference: H02-0708-14 3 For employment purposes (SH1) in association with draft Policy 7 - Improving South-East Lincolnshire's Employment Land Portfolio.

ID1: 1173 comment_author: Waller Planning

comment content:

Site Cro010 has now been granted planning permission (H02-0468-14) for 50 dwellings. This site is currently under construction. Site Cro017 lies immediately to the south, and is effectively a second phase of the same development. The Council's SHLAA 2016 notes that Cro017 is only suitable for development if the adjacent land at Cro010 is developed, as this would physically link it to the town. As site Cro010 is being built out, we believe that this issue has been addressed, and the Councils can have comfort that this is a suitable location for development. It has already been demonstrated, through the previous planning permission, that site Cro010 is suitable for development. The principles which informed that planning application are also relevant to Site Cro017, as follows:

A suitable highway access has been constructed to Site Cro010. This has sufficient capacity to accommodate the additional development, which is estimated at around 45 dwellings.

Surface water within Site Cro010 would be accommodated within the site using SuDS techniques, and these could also be used on Site Cro017.

We understand that Cro017 can accommodate at least around 45 dwellings, whilst complying with all of the Council's policies, such as providing suitable areas of public open space, generous private garden areas, and a high quality public realm. The proposed development is also likely to be able to provide a mix of both market and affordable housing.

This site is entirely developable and deliverable, and is backed by Ashwood Homes, who wish to construct the above mentioned residential development following completion of Site Cro010.

Officer Comment:

Site Cro010 adjoining the site to the east is being built out and would help integrate Site Cro017 with the Crowland built area. The Highways Authority identifies that 'services and facilities are accessible by foot, bicycle and public transport. Access from Cro010 or James Road would be suitable'. The Lead Local Flood Authority will need to determine whether surface water run off from Cro017 can be adequately accommodated within the SudS provided within Cro010. The site capacity is 35 dwellings at 20dph, the preferred density for Crowland. The size of the site indicates that a good design can provide for recreational open space as well as a mix of housing types and tenures. Confirmation of availability and deliverability is welcome. Points highlighted from the SHLAA are not disputed. The site is within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard', similar to all but two potential housing sites. Site Cro031, Site Cro041 and site Cro045 are within Flood Zone 3a, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard', similar to all but two potential housing sites. In terms of Cro031: access from Clout Drove would require the carriageway to be widened and upgraded and the footway to be extended up to the site entrance. The site's development would have a major impact upon the landscape, but the site's visual impacts will be greater than some other potential housing sites. Cro041: the northern boundary has some screening which will help prevent the site protruding into the open countryside. Access via the garden centre and caravan site would be geometrically feasible although the culvert carrying the road over the water would need to be investigated to

Officer Recommendation:

Site Cro017 is one of the more suitable Potential Housing Sites in Crowland, and it should be taken forward as Preferred Option Housing Allocation.

In addition, we note that the SHLAA 2016 concludes the following with regard to this site:

It will not have adverse impacts on natural, built or historic assets.

It is accessible to Crowland's existing services and facilities.

Services and facilities are also accessible by foot, bicycle and public transport. The site lies within Flood Zone 3a, but this is also true of several of the potential housing sites identified around Crowland. It is not possible to meet the need for development in the town without developing land within Flood Zone 3a, as is also the case in several other settlements in the area, including the two Sub-Regional Centres of Spalding and Boston. We support the proposed Spatial Strategy in principle (see our representations on Policy 2), which we note concludes that flood risk is one of a range of factors which should be considered in the context of locating new development. Crowland is a sustainable location for development, and suitable sites such as Cro017 are required to meet the need for housing. The alternative sites on the town's northern boundary (Cro031, Cro041 and Cro045) are also located within Flood Zone 3, and so are no sequentially better in terms of flood risk. These sites suffer from relatively poor highway access, and they would also have a far more major impact on the landscape, when viewed from the surrounding countryside. As such, we believe that they would have a greater environmental impact than residential development at Cro017. In addition, we believe that there is a benefit in identifying a range of sites around the town, as this will spread, and reduce the impact of new development in terms of matters such as disruption for local residents and the impact on the local highway network. We therefore believe that Site Cro017 should be identified as an allocation for

see if it is suitable for adoption, otherwise a new culvert would be required. The existing separate footbridge is not suitable for adoption. Cro045: the site will extend the settlement into the countryside to the north from Foreman Way and beyond the school. A suitable access could be achieved from Foreman Way and Cloot Drove but this would require the extension of the footway up to and across the site frontage and require the crossing of a substantial watercourse. Access could be achieved to all sites but these might not be as straightforward as for other potential housing sites. Identifying a range of housing in locations across the town is not essential but may lead to the highways network being used in a different way than if all the sites were in one location.

housing in the new Local Plan.
