

Post_title: **10: Sutton Bridge**

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

ID1:

203

comment_author: Savills

comment_content:

Our client, The Henry Smith Charity, is the landowner of Site Sub013 'Land to the south of Bridge Road, Sutton Bridge'.

As stated above, we fully support the future growth of Sutton Bridge as a Main Service Centre. In addition to the generic growth of the settlement, we fully support the allocation of Site Sub013 'Land to the south of Bridge Road, Sutton Bridge' for housing development and consequently support the proposed amendment to the Settlement Boundary to encompass this site within the new development limits of Sutton Bridge.

The site is located immediately adjacent to the existing settlement boundary of Sutton Bridge and is accessible to existing services and facilities. There are also existing bus stops on Bridge Road. Furthermore, as stated in the consultation document, the Highways Authority identifies that services and facilities are potentially accessible on foot and bicycle from the proposed allocation. It is therefore a sustainable site to accommodate future development.

The location of Site Sub013 will help meet the development needs (as set out in Policy 12 'Distribution of New Housing' - whereby it has been illustrated that, after considering extant planning permissions and dwellings built since April 2011, there is still a need to accommodate at least a future 167 dwellings) in a sustainable manner.

We note the Council's comments that the overall capacity of this site is 207 dwellings (at 20 dwellings per hectare), which is above the residual requirement of 167 dwellings. We support this initial site assessment but note that the South East Lincolnshire Strategic Housing Land Availability Assessment (January 2016)

Officer Comment:

Support for the future growth of Sutton Bridge as a Main Service Centre is welcome. Support for the increase in housing provision in Sutton Bridge is welcome. Support for the allocation of Sub013 is welcome, as is the support for the proposed settlement boundary. The site's location, accessibility to services and potential access is not disputed. The SHLAA identifies that the preferred density for sites in Sutton Bridge is 20 dwellings to the hectare (210 dwellings), and not 25 or 30 dph. Recognition that the southern part of the site has a higher flood risk is welcome. It is accepted that the density, design and layout of the scheme will be finalised through the planning application process. The residual requirement is 164 dwellings but it is accepted that this is a target rather than a maximum figure. The Sutton Bridge Housing Paper acknowledges that 'The capacity of the sites assumes that they will be developed at a density of 20 dwellings to the hectare. In practice, some sites are likely to accommodate a higher density' so it is acknowledged that the figures are indicative. For consistency the density for this site will be amended to 210 to reflect the 20dph aspiration. The extent of the additional land in the same ownership is noted, however allocations post 2036 will be a matter for the next Local Plan.

Officer Recommendation:

Sub013 to be known as Sub027 is one of the more suitable housing sites in Sutton Bridge and should be taken forward as a Preferred Option Housing Allocation. Amend the Sutton Bridge Housing Paper to reflect the 20dph density in the SHLAA.

for Sutton Bridge, a supporting document to the draft Local Plan, identifies that the proposed housing site Sub013 could deliver 270 dwellings at a density of 30 dwellings per hectare and 225 dwellings (dph) at a density of 25dph.

However, the southern part of this site has a higher flood risk than the majority of the site and it may be more appropriate to locate open space in that location. Whilst we acknowledge this and agree that the best use of the land to the south of the site could be to accommodate land uses which are considered more appropriate in areas of potential flood risk, it is important to note that final housing numbers, land use and layout for the site would be established during the preparation of a planning application. The final site yield is therefore still to be determined.

However, we acknowledge that there is an identified housing requirement for 167 dwellings, but that this is not a maximum housing figure; it is purely an approximate to ensure the housing needs and demands for Sutton Bridge are met during this Plan period. As such, the 167 dwellings should be identified as an indicative housing yield on the understanding that final figures will be established during the application process.

Subsequently, we have concerns over stipulating that the density / yield for this site should be 162 dwellings at 20 dwellings per hectare. We propose this element of the policy / site allocation is removed.

Notwithstanding this, we agree that a minimum housing requirement for Sutton Bridge could be set but that this should be amended to 210 dwellings over the plan period as follows to comply with Revised Policy 12: Distribution of New Housing:

Years 1-5 Years 6-10 Years 11-15 Years 16-20 Years 21-

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25 Years 26+ Total

Completions 21 - - - - - 21

Commitments - 22 - - - - 22

Sub013 0 50 117* - - - 167*

Total 21 72 117* 0 0 0 210*

*Red text illustrates proposed amendments.

We therefore support the allocation of Site Sub013 as a housing site to accommodate circa 167 dwelling over the Plan period, but suggest that the housing numbers are included for indicative purposes only and that final housing numbers will be established during the preparation for a formal planning application.

Finally, Site Sub013 will help address the housing needs during this Plan period. However, we would like to inform the Joint Committee that our client, the Henry Smith Charity, also owns land to the west of the proposed allocation. As such, it is considered that land to the west of Site Sub013 could accommodate residential development post 2036.

In conclusion our client, The Henry Smith Charity, is a landowner in South East Lincolnshire, with particular interest around the settlement of Sutton Bridge.

Sutton Bridge should remain as a 'Main Service Centre'.

We fully support this assertion. We therefore support Revised Policy 2: Spatial Strategy and do not propose any changes to the policy or its supporting text.

In respect of Revised Policy 12: Distribution of New Housing, we fully support Sutton Bridge accommodating future development to help meet the identified housing need of South East Lincolnshire.

Since the last public consultation earlier this year, there has been a increase in the housing requirement proposed at Sutton Bridge (from 180 to 210 dwellings).

We therefore support Revised Policy 12, particularly the increase of housing provision at Sutton Bridge from 180 to 210 dwellings during the Plan period.

Additionally, our client, The Henry Smith Charity, is the landowner of Site Sub013 'Land to the south of Bridge Road, Sutton Bridge'. We therefore fully support the allocation of Site Sub013 for residential development.

The site is suitable, available and deliverable in a sustainable location. Consequently, we also support the proposed amendment to the Settlement Boundary to encompass this site within the new development limits of Sutton Bridge.

However, whilst we support the proposed allocation, we suggest that the housing numbers / yield identified per site are included for indicative purposes only and that it is confirmed that the final housing numbers will be established during the preparation for a formal planning application.

Finally, Site Sub013 will help address the housing needs during this Plan period. However, we would like to inform the Joint Committee that our client, the Henry Smith Charity, also owns land to the west of the proposed allocation. As such, it is considered that land to the west of Site Sub013 could accommodate residential development post 2036.

We welcome future discussions with the Council regarding the site identified in this representation and we should be pleased if the above comments would be taken into account during the preparation of the South East Lincolnshire Local Plan.

As a final point, we respectfully ask that we are kept informed of all future consultations during the Local Plan process.

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ID1: 204 comment_author: Mrs Joan Ansell

comment content:

Very unhappy about the use of land between the A17 and Bridge Road for 162 houses. There is noise from the A17 constantly. I hope at least there will be backing on to Falklands Road bungalows.

My concerns are:

- a) overcrowded schools
- b) insufficient medical service
- c) no police/ambulance service
- d) no work for people - is it realistic? I know houses are needed by it all seems very flakey
- e) there will be so much traffic on Bridge Road and there are no enforceable restrictions at the moment

Officer Comment:

A noise assessment may be required for Sub013 to identify noise levels from the A17, and if necessary identify noise attenuation measures such as acoustic barriers, buffer zones (which could also incorporate open space) and acoustic vents in dwellings. Therefore, it is considered that any adverse noise impacts can be satisfactorily addressed through the planning application process. The County Education Department has commented that there is sufficient capacity at the primary school for the level of development proposed. There is limited secondary capacity from 2016-2018, additional capacity would be required but The Peele School has sufficient land to expand. There is a lack of capacity at sixth form level at University Academy Holbeach. A study will be required to identify the nature of the buildings to be delivered and will be dependent on each school's needs. The CCG's have commented that currently there is some capacity at the local GP surgery(ies) to accommodate additional patients, however County-wide there is an increasing shortage of GP's, nurses and other healthcare staff which could affect future capacity should demand increase. The Local Plan will have to demonstrate how arising infrastructure needs will be met. This will be evidenced through the Infrastructure Delivery Plan and subsequent versions of the Local Plan. About 8ha of new employment land is being allocated in the Sutton Bridge/Long Sutton area to support new businesses. Additionally, seven employment sites are being protected for ongoing employment use, most have space to expand or intensify on site. This level of provision is considered appropriate to help provide employment for existing and future residents that may

Officer Recommendation:

Sub013 to be known as Sub027 is one of the more suitable housing sites in Sutton Bridge and should be taken forward as a Preferred Option Housing Allocation. Further work will be undertaken in the IDP to ensure the impact upon doctors and schools and likely mitigation identified.

want to work in the area. The Highways Authority identifies that 'the opening [along Bridge Road] is long enough to be able to accommodate a suitable junction with the required visibility splays. This is within the 30mph limit.' Therefore, it appears that a satisfactory access solution can be achieved, although inevitably this will generate additional traffic on Bridge Road, but additional traffic will be a consequence of most Preferred Sites. The need for additional highways safety measures required as a consequence of development will be a matter for a planning application.

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ID1:

205

comment_author:

Sutton Bridge Parish Council

comment_content:

The following comments are from Members of the Sutton Bridge Parish Council's Working Party for the S E Lincolnshire Local Plan. The Parish Council requested an extension to the consultation deadline of the 12th August however this was rejected. It was impossible to call an extraordinary Parish Council meeting prior to the 12th August in order for the Council to approve on a Parish response and therefore the comments below are from Working Party Members acting in their personal capacity.

The Working Party felt very strongly that an extension should have been granted. The whole process for the Plan has been continually delayed and a further week to receive our comments formally should not have caused any undue delay. Seven days from the exhibition to receipt of comments is unconstitutional and it is felt that our comments do not matter!

Land for Residential Use (Ref: Sub013)

Originally we requested housing be located in The land North of the Westmere School as it was included in the 1998 local plan.

The Planners subsequently suggested a strip for housing development along the south side of Bridge Road which we opposed as it was contrary to their planning guidelines.

The new proposed area for residential development effectively expands the Falklands Estate and is a logical progression for housing. We would support this providing that any development must take into account

Officer Comment:

The Preferred Sites consultation was a non-statutory consultation for six weeks. The consultation was widely publicised meaning that all consultees had sufficient time to consider proposals and prepare comments. Support for Sub013 is welcome. Support for Sub013 is noted. Development of 10 or more dwellings is currently expected to provide at least 14% of the gross site area as open space. The design of the development will help determine where the open space should go, although on Sub013, flood risk and amenity issues relating to proximity to the A17 may influence the location of some space to the south of the site adjacent to Billy's Wood. The LPA can only seek developer contributions for infrastructure and works necessary to make the development acceptable in planning terms; so improvements to existing open space must be directly related to the development and be fairly and reasonably related in scale and kind to the development. In general, SHDC does not adopt new open space and take responsibility for future maintenance; this would need to be addressed through an open space management plan submitted with a planning application. The Local Plan should only identify sites for development which can be delivered; there are no sites identified for green space in Sutton Bridge at the moment, therefore none are shown. The location of new open space delivered through new development is only identified on mapping systems once development takes place so that the exact location and boundary can be recorded. Currently, at least 14% of the gross site area of a new development should be open space, however the precise amount identified for this site will be a matter for a planning application. The LPA can only seek developer

Officer Recommendation:

Sub013 to be known as Sub027 is one of the more suitable housing sites in Sutton Bridge and should be taken forward as a Preferred Option Housing Allocation. Sub026 is not one of the more suitable housing sites in Sutton Bridge and should not be taken forward as a Preferred Option Housing Allocation. SB001 West Bank is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Established Employment Site. LO009 Bridge Road is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation. LO011 Land to the east of Hundreds Lane is not one of the more suitable employment sites in South Holland and should not be taken forward as a Preferred Option Main Employment Allocation. SB007 Wingland Power Station is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Restricted Use Site.

the road noise from the A17 and create a green space, ideally linking up and adopting the area known as Billy's Wood.

Green Spaces

No new areas have been defined despite comments in our earlier response. Green Spaces are currently under-provided in Sutton Bridge. Green areas should be included within the new housing area above at an absolute minimum.

West Bank Business Area

We are disappointed that our views on enhancing this area and re-zoning it for residential development has not been included. We would recommend that the definition of this area be changed to 'Residential'. It backs onto the golf course and fronts on to the River Nene and the marina site.

It is anticipated that the new £900,000 commercial and leisure marina for Sutton Bridge will have leisure moorings which will cater for up to 20 boats (a combination of those owned by local boaters and visiting craft), while the commercial moorings will ensure that both the Nene navigation pilot boat and Eastern IFCA (Fisheries Protection Agency) can remain based in Sutton Bridge. Cllr Colin Davie, Executive Member for Economic Development, commented: 'The marina will act as a gateway to the county and we want to make it as attractive to visitors as possible. We anticipate it will lead to increased visitor numbers, many of whom will be using local shops, pubs and restaurants. We also expect to see opportunities arise for businesses providing services for the boating community. This will provide a significant boost to the local economy, something that will benefit businesses

contributions for infrastructure and works necessary to make the development acceptable in planning terms; so any open space or improvements to existing open space must be directly related to the development and be fairly and reasonably related in scale and kind to the development. Requiring open space in excess of the minimum may not, therefore, be possible as part of a viable development. The SHLAA identifies that 'West Bank Business Area is currently in a variety of commercial uses and its owners have not been identified. The owners' intentions for the land are unknown, and consequently the site cannot be considered as available'. This means that the site cannot be considered for housing development during this plan period. National planning policy has changed since the 1998 Local Plan was adopted; the Local Plan is only able to identify sites that are suitable, available and achievable in the plan period. The Employment Land Technical Paper identifies that the Bridge Road site is able to meet these three criteria whereas it is considered that the wider area of land between Princes and the A17 would not. To open-up this area for development would involve significant new highways infrastructure potentially in the form of a new roundabout. This would have to be provided by the development. It is unlikely that employment development in this location would be able to do so as part of a viable scheme, in the plan period. Therefore this site would not be deliverable. Recognition that the EDF Power Station is identified on the Policies Map is welcome. The town centres and primary shopping areas in the Local Plan have been defined with reference to the National Planning Policy Framework. The NPPF defines a town centre as 'including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping

and residents alike.'

A redefinition would preserve the lived-in feel of the area " it would be a pleasant place to live.

Little Sutton Industrial Site

We are disappointed that this logical solution has not been progressed with only an additional small area define in the Long Sutton plan off Bridge Road. This additional space is welcomed but d s not deal with the issue of road access to the A17.

We suggested that this area between Sutton Bridge and Long Sutton is well placed to cater for such development needs. In fact the 1998 plan states that this was the preferred option. Land between Princes Foods and the A17 in Little Sutton would offer a large enough industrial site to cater for Long Sutton and Sutton Bridge during the life of the plan. It would also allow for residents newly employed to walk or cycle to work from both areas.

The site would have easy access to the A17 by-pass by way of an extra arm on to the existing four-arm roundabout at Long Sutton, thus relieving Pop Bottle Bridge at Long Sutton and deterring HGV's from using the old A17 through Sutton Bridge. Importantly this site is also outside the Zone 3 flood risk area.

We understand that you are not aware of businesses that would wish to come to this area but would suggest that it offers an ideal 'gateway' to South Lincolnshire for produce related businesses and would be easy to market with access to the A17.

area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.' It goes on to define a primary shopping area as 'an area where retail development is concentrated'. The concentration of town centre uses, including retail in Sutton Bridge is at the eastern end of Bridge Road (up to Church Street). Moving west from Church Street for over 400m the area becomes residential, with housing dominating both sides of Bridge Road. This means that the Railway Lane/Bridge Road junction is detached, and not adjacent to the primary shopping area (as defined by the NPPF). However there are some town centre uses at the junction (a chemist, fish and chip shop, convenience store, public house and hair/beauty salon) interspersed with residential properties which would form a neighbourhood parade of shops. The Local Plan will protect and promote individual local shops and local community facilities and small neighbourhood clusters of them within a settlement boundary but outside a town centre. Designating Conservation Areas is not a matter for the Local Plan, this designation can be achieved through a separate process. It is considered that the planning permission for the extension of the port has been implemented, and that if the site is developed it should be in accordance with the extant planning permissions. The employment site occupied by Scottes, Feldbinder and Shires is protected as a Specific Occupier Site for employment use.

Wingland Industrial Site

We are pleased to note that the area has been reduced from the previous Plans as it was blighted for development by the lack of services and has been marketed for twenty years to no avail.

We note that EDF B Power Station is now marked on the Plan.

Shopping Centre

The shopping area should remain as previously designated or at least as far along Bridge Road as the former Post Office.

Conservation area

We have a copy of a document which was fully prepared 10 years ago by SHDC. It needs to be reinstated and acted on as quickly as possible. Buildings of historical interest have already been lost. No reference to an area of conservation has been made, however it was commented at the exhibition that this could be actioned after the Plan. Regretfully these are empty words if nothing is agreed now.

Land North of the Port

No development of this area has taken place in the last twenty years. If it is not removed from the plan we request a policy put in place to ensure that the land is not developed until a new access road is built. The West Bank is not capable of taking any more traffic and it will have the addition of traffic and parking for the Marina.

East Bank Lighthouse

Very disappointed that this area has again been missed of the Local Plan “ this is a missed opportunity to

enhance this wildlife and conservation area and improve the coastal walks.

The Environment

We feel there should be more policies included to protect the environment.

General observations

The map contains a number of inaccuracies and anomalies and the Joint Strategic Planning Committee are urged to review it and ensure it is correct for the next stage of the process.

Examples are; The Curlew Centre not shown, allotments incorrect, Garden of Rest not shown and the 'employment site' used by Feldbinder/Shire Garden Buildings are not highlighted.

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ID1: 206 comment_author: Environment Agency

comment content:

Sub013 -

We are disappointed to note that the number of dwellings to be allocated to this settlement has increased from 180 to 210 as Sutton Bridge is at a high risk of flooding from the tidal River Nene. However, we are pleased to note that your preferred site allocation is the most sequentially preferable in flood risk terms. The depths of flooding identified in the Strategic Flood Risk Assessment will need to be mitigated through design in order to pass the Exception Test - i.e. depths generally are 0.5-1 m with an area to the south of the site where depths are 1-2m.

It is important that the site promoter acknowledges the level, and additional costs, of flood mitigation that will be required to make the dwellings safe (i.e. confirms that the NPPF Exception Test can be passed, through built in resistance measures to mitigate against the appropriate breach scenario with allowances for climate change for the lifetime of the development). Confirmation that the sites will still be viable, and therefore deliverable, when these additional costs are taken into account should be sought from landowners/developers.

Such mitigation can also impact on the final design of the houses, i.e. raising the height due to finished floor level requirements and sometimes needing to be 3 storey with no ground floor habitable rooms - such requirements often fall into conflict with other planning policies and you need to be confident that sites can incorporate the required mitigation, and still be acceptable on other planning grounds.

Officer Comment:

It is acknowledged that Sutton Bridge is at high risk of flooding from the tidal River Nene, however the Environment Agency have provided detailed guidance relating to mitigation (in section 4.3) to ensure that all new development will be designed to a safe standard. As such, a slight increase of 30 dwellings in the housing figure is considered appropriate to deliver a better form of flood resilient development in Sutton Bridge and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Sub013 to be known as Sub027 is one of the more suitable housing sites in Sutton Bridge and should be taken forward as a Preferred Option Housing Allocation. Further work will be undertaken with the promoters of allocations to ensure that mitigation can be delivered as part of a viable scheme.

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ID1: 207 comment_author: Anglian Water

comment_content:

The proposed housing allocations in this area is expected to require improvements to the existing water supply and foul sewerage networks to enable development to come forward on these sites. Please refer to the enclosed spreadsheet for detailed comments relating to these sites.

Officer Comment:

The Local Plan will have to demonstrate how arising water and sewerage infrastructure needs will be met, and these matters will be dealt with in later versions of the document and the Infrastructure Delivery Plan that will accompany it.

Officer Recommendation:

No change required to site selection. Further work will be undertaken in the IDP to ensure Anglian Water's concerns are identified.

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ID1:

208

comment_author:

Robert Doughty Consultancy

comment_content:

Sutton Bridge

We support the recognition of the port as a restricted use site. We note that land to the north of the existing port is identified as a 'proposed restricted use site', but would point out that the land identified within the red line does not reflect the actual extent of the four extant planning permissions on site.

On the 19th August 2009, work started on site which preserved planning permissions H18/1270/00, H18/1433/00, H18/1373/03 and H18/0896/04. We have attached a plan that shows the extent of those permissions together with a satellite image. We would also make the point that the access into this land is via the existing river bank that leads directly from the port area and not via Petts Lane, as indicated on the draft settlement plan.

We should, therefore, be grateful if you would amend the proposed restricted site allocation and the associated settlement boundary to reflect those implemented permissions. Although the proposed settlement boundary does not impact on the ability to build out the extant permissions, an adopted Local Plan which incorrectly identifies the Port's long term development land may have the impact of putting off investors and general interest in port related activities. It is, therefore, important that the draft plan accurately reflects the existence of these permissions.

Officer Comment:

The promoter has confirmed that the planning permission for the port expansion has been implemented. It is therefore appropriate that the consented site is shown on the Policies Map and the site shown within the settlement boundary. However the development of the site will be restricted to port-related development.

Officer Recommendation:

SB003 Sutton Bridge Port is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Restricted Use Allocation. Amend the boundary of the proposed restricted use site to include land that has been consented and implemented. Amend the settlement boundary to reflect the site boundary.

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ID1: 209 comment_author: Cllr C Brewis

comment content:

I think the area of land allocated for possible future commercial use of Centenary Way, Wingland, remains too small. Support industries for the existing food producers should be welcomed. It seems to me that a clause saying that any business wishing to locate itself near those industries would be both welcome, and good and sustainable in environmental terms. Most seriously I thought the valid points I had made about the 'shopping area' of Sutton Bridge had been accepted. The highest concentration of commercial premises in Sutton Bridge consists of the Pharmacy, the Fish Shop, the Newsagent/Corner Shop, and the Pub, at the junction of Bridge Road and Railway Lane. To include the 'old' Post Office is odd, since it is closed and currently on the market as a residence, but to extend the shopping area to include the area afore mentioned is sensible. Thank you for all your hard work, and I shall, if necessary, attend any inquiry held by an Inspector.

Officer Comment:

The town centres and primary shopping areas in the Local Plan have been defined with reference to the National Planning Policy Framework. The NPPF defines a town centre as 'including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance.' It goes on to define a primary shopping area as 'an area where retail development is concentrated'. The concentration of retail development in Sutton Bridge is at the eastern end of Bridge Road (up to Church Street). Moving west from Church Street for over 400m the area becomes residential, with housing dominating both sides of Bridge Road. This means that the Railway Lane/Bridge Road junction is detached, and not adjacent to the primary shopping area (as defined by the NPPF). However there are some town centre uses at the junction (a chemist, fish and chip shop, convenience store, public house and hair/beauty salon) which would form a neighbourhood parade of shops (although these are interspersed with residential properties); the accompanying policy protects and promotes individual local shops and local community facilities and small neighbourhood clusters of them within a settlement boundary but outside a town centre. The wording of the policy should ensure that should an application for a change of use be submitted the appropriate level of protection is given, alternatively should a unit wish to expand that should also be supported up to a size threshold designed not to undermine the vitality and

Officer Recommendation:

No change required.

SB002 Wingland is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Main Employment Allocation. No change required to SB002. Ensure that Policy 7 is worded to ensure appropriate employment development can take place outside of allocated sites.

viability of the town centre. The old Post Office was included in the boundary because when we undertake a retail survey each building that is vacant is considered on the basis of the Use Class it had prior to its vacancy (in accordance with Class D2 (d) of the GPDO amendment).

The amount of employment land proposed for South East Lincolnshire took account of many issues, including: the findings of the South East Lincolnshire Employment Land Technical Paper (January 2016); the existing and predicted population of the area; economic conditions and trends between 2001 and 2016; and the take-up of land for B Use development across South East Lincolnshire and within employment allocations. Although it is accepted that the take-up of land and market interest for the available land at Wingland does not justify the identification of the remaining allocated land, it is considered that allocating a small amount of land is appropriate to accommodate the expansion of existing uses or for the development of small-scale enterprise. Within Policy 7 provision will be made to ensure that employment development outside allocations can take place provided that criteria are met including for design, highways and amenity impact.

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ID1: 210 comment_author: Maxey Grounds & Co LLP

comment content:

Our clients land comprises the area known as SUBO24. It lies to the north of Chestnut Terrace, Withington Street and Sutton Bridge Primary School running between Allenby Chase and Granville Terrace. The land is of irregular shape intertwining with the existing developed areas.

At present a small part of the land is allocated within the 2006 local plan. It has not yet been brought forward solely because of a wish to see a more comprehensive form of development, and has been promoted as being a suitable area for growth and housing provision in Sutton Bridge with this aim. As present in the consultation papers the site is not identified as preferred. However in comparison with the preferred site (Sub 013) we would make the following comments.

In relation to location, my clients site is more integrated into the existing built environment, is closer to the settlement centre and services than Site SUB013 which would very much be an incursion into open countryside.

In relation to flood risk, we have studied the South Holland SFRA documents on the Local Plan website which is the most up to date evidence published on that website by the Council. We note that:

On the Actual Risk and Predicted Time Contours maps, 9 present day and 15 2115, most of my clients site is outside the area where flood water is predicted to reach within 3 hours whereas most of site SUB013 is within the 3 hours contour in both cases

Actual Flood risk maps page 7 and residual flood risk maps page 7 show predicted depths of no greater than 0.5 " 1.0m on both my clients site and SUB013, and

Officer Comment:

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

Officer Recommendation:

Sub024 is not one of the more suitable housing sites in Sutton Bridge and should not be taken forward as a Preferred Option Housing Allocation. Sub013 to be known as Sub027 is one of the more suitable housing sites in Sutton Bridge and should be taken forward as a Preferred Option Housing Allocation.

actual and residual flood hazard on both sites in 2115 is equivalent with current day hazard lower on my clients site so supporting the view that there is no sequential preference to SUB013. Whilst Karen Johnson has sent what is claimed to be direct information from EA it appears to contradict the published SFRA information within the evidence section of the website. It would also appear this is leading to an incorrect summary in the site assessment conclusions relating to SUBO24. It is submitted that this site has sequential preference to SUB013 in the short terms and is no worse in sequential terms in the future. It is further submitted that the conclusions stated in the January Consultation document are also incorrect in that the site predicted flood depths are not in excess of 1.6m, are mainly 0.5 ” 1.0 m with small areas that could be utilised as open space areas between 1.0 and 1.5m in extreme future events. This is based upon the plans within the published SFRA.

The highway assessment for my clients site lists all the potential access points, which have the benefit of access and traffic being spread over a number of junctions rather than overloading any one. It concludes that a satisfactory vehicular access could be provided. It would be our intention if the proposed site were allocated to also utilise Allenby Chase and achieve, as is stated would be desirable, a combination of road access points. It is submitted that there are no highway grounds to prefer SUB013 to my clients site (SUBO24). My clients site is better placed for pedestrian and cycle journeys between the site and village facilities and in particular the Primary School which it adjoins. There is scope to improve access to the school as part of proposals if desired.

In general, the January consultation and July consultation comments have in reality little between

that ‘there is a difference between the SFRA and the EA’s hazard maps. At the time the SFRA was undertaken, the EA were undertaking hazard mapping for the East Coast to feed into the Lincolnshire Coastal Study. It was the EA’s opinion that secondary, as well as primary, flood defences should be breached in the modelling – Royal Haskoning had only modelled the primary defence breaches along the coastline in the SFRA. However, rather than Royal Haskoning redoing their model, it was decided that the EA’s model would be used – amalgamated into the modelling for the River Nene as soon as possible. This was done but it is not part of the published SFRA. The maps supplied show this amalgamated modelling scenario, which is considered the most up to date information on risk to Sutton Bridge. The SFRA is being updated as it is no longer considered to be the most up to date information on flood risk; additionally it does not cover all the areas where sites are being allocated, hence the need to update. The draft outputs of the updated SFRA for Sutton Bridge now appear identical to the EA’s hazard mapping for this area. The EA’s hazard maps (and the draft updated SFRA outputs) show that approximately 60-70% of Sub024 has depths of 1-2m. Sub013 has approximately 30% of depths of 1-2m, with 70% being 0.5-1.0m. Sub013 is therefore the most sequentially preferable site in terms of flood depths predicted on site in the correct modelled scenario’. The Sutton Bridge Housing Paper (July 2016) accepts that development on Sub024 ‘should be served by all roads leading northwards from Bridge Road so that traffic movements are not concentrated on one road’. However it states that while ‘it appears that a satisfactory vehicular access could be provided, arrangements for other, alternative sites will be more straight-forward’, such as in relation to ransom strips that may exist; no evidence has been

them other than on the stated flood risk, which does not accurately reflect the SFRA information. The SFRA clearly has legitimacy as it is published on the website as the evidence document on flood risk.

SUB024 has an area of 3.3 ha and thus could accommodate around 60- 80 units with appropriate landscaping and open space. This is in relation to a residual need for Sutton Bridge of 167 homes. It is submitted that to provide all new allocation, which is likely to constitute 90% of all new housing provision for the village in the plan period, in one site and one ownership introduces a delivery risk. If that site were delayed or did not come forward it could lead to a significant deficit within the village. My clients appreciate the need to demonstrate their land is available and intend to submit an application shortly for the part of SUB024 currently within the development area, as a first phase of development of that ownership. We submit that a reduction of delivery risk would be achieved if both SUB024 for say 70 units, and the northern part of SUB013 for 100 units were allocated. This would enable a further allocation of the southern part of SUB013 on review of the plan, likely to be within 5~10 years and probably before later phases would be brought forward in any case.

We thus submit that site SUB024 should be allocated for development for around 70 units, and the extent of allocation on site SUB013 be curtailed at this stage to the northern part of the site for around 100 units, with comment that this is envisaged as a first phase of development in this area, and that the remainder of the area can be considered as part of any further review.

submitted to counter this point. It is accepted that there is scope to enhance access to the primary school and other facilities through Sub024. The SHLAA identifies that at 20 dwellings to the hectare (the preferred site density for Sutton Bridge) Sub024 could accommodate 74 dwellings. The site's availability is noted, and the proposed planning application for the site is welcome. The SHLAA does not identify any deliverability concerns with Sub013 therefore there is no need to identify two Preferred Sites in Sutton Bridge;