

SOUTH HOLLAND LOCAL PLAN

Public Local Inquiry

Core Strategy Round Table Session

Combined Position Statement and Responses  
of  
South Holland District Council

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## **CORE STRATEGY**

**Topic 1. Is it appropriate for the Plan to include reference to the Council's 'longer term' aspirations, as set out in paras. 2.41-2.44?**

### **1.0 Summary of Other Participants' Position Statements**

#### **1.1 Smith Stuart Reynolds on behalf of Allison Homes (PS/638/CS)**

Mindful of the emphasis on Spalding but would dispute a potential future re-classification of the town up the hierarchy in Regional Spatial Strategy for the East Midlands. The long term aspirations for Spalding and its role within the sub-region should be held in abeyance until addressed through the RSS.

#### **1.2 Graham Warren Partnership on behalf of Broadgate Homes (PS/655/CS)**

Yes it is appropriate. This Local Plan is a stepping stone to the Local Development Framework.

### **2.0 Position Statement and Response of the Council**

2.1 The Council remains of the view, in the light of the other participants' statements, that it is appropriate for the Plan to include reference to the Council's 'longer term' aspirations, as set out in paras. 2.41-2.44. This is explained in our Core Strategy Topic Paper (CD/SH/30) at paragraph 5.3.16.

2.2 In progressing from the First Deposit Draft to the Redeposit version of the Local Plan, and extending the plan period from 2011 to 2021, we have identified some elements for inclusion as proposals in the Plan. We have sought to only identify as proposals those elements that are reasonably certain to be capable of delivery within the plan period. Other aspects of the 'longer term aspirations' are usefully set out in and are appropriate to Chapter 2 of the Plan "Plans and Strategies, Objectives and Priorities".

- 2.3 The Council has proposed relevant Pre-Inquiry Changes (CD/SH/21). PIC 13 clarifies the reference to a potential bypass for Whaplode and Moulton in paragraph 2.44 of the Plan. PIC 73 makes additional clarifications about the status of potential road schemes in Chapter 8 of the Plan “Transport and Communications”.
- 2.4 The Council recognises that it will be for the review of RSS8, currently underway, to consider any proposals for reclassification of Spalding within the regional settlement hierarchy. However, within the current Local Plan it is for the Council to set out how it wishes to distribute the development apportioned to the urban areas of the District by the Structure Plan. The Plan does not indicate that Spalding should be moved up the hierarchy and we recognise that this is a matter that could only be pursued through the RSS review.

**Topic 2. Is the Plan's strategy for the distribution of development appropriate; in general terms, are the Plan's proposals consistent with the underlying strategy? Are the settlements suitably ranked within the settlement hierarchy? Are the locations of homes and jobs suitably related?**

### **3.0 Summary of Other Participants' Position Statements**

#### **3.1 Smith Stuart Reynolds on behalf of Allison Homes (PS/638/CS)**

Agree with the hierarchy but there is too much emphasis on Spalding at expense of the Area Centres. Distribution of new housing amongst Spalding and the Area Centres should be led by the indicator of their size (population), achieving a better balance between housing and jobs.

#### **3.2 Paul Walls (PS/654/CS/H/E)**

For planning, Pinchbeck should be considered together with Spalding as a single entity. By comparison, Cowbit, Deeping St Nicholas and Weston are less deserving of Group Centre status. The area between Spalding and Pinchbeck is a sustainable location and should accommodate carefully planned development as an alternative to such extensive development at Holland Park.

#### **3.3 Graham Warren Partnership on behalf of Broadgate Homes (PS/655/CS)**

Agree with the hierarchy except for Donington, which is part of the Structure Plan 'rural area' and should be a Group Centre. Emphasis on Spalding for major development is appropriate. The relationship between homes and jobs, in so far as it can be controlled, is dealt with appropriately.

### **4.0 Position Statement and Response of the Council**

4.1 The Council continues to maintain that the Plan's strategy for the distribution of development is appropriate as explained in the Core Strategy Topic Paper (CD/SH/30) at paragraph 5.3.4.

4.2 Allisons have set out at paragraph 3.3 of their statement the distribution of housing allocation in the Plan. It should be noted however that their table does not include the full planning provisions of the Plan for housing growth, which would include permissions, urban capacity and allowances as set out in Appendix 1 of the Plan. Their table at paragraph 3.5 uses population by ward (in the case of Spalding, the aggregate of Spalding wards) which are quoted in our Monitoring Report, whereas a more appropriate set of population estimates for this purpose would be the District Council's own estimates of population by settlement, which are included in our Monitoring Report Background Paper (CD/SH/17). It may be noted that when compared to Allisons' table, the following alternative indicates higher percentages at Spalding, Crowland and Holbeach and lower percentages at Long Sutton, Sutton Bridge and Donington. The alternative figures are as follows:

<b>Table 1: Population of Urban Areas and Donington (Settlements)</b>		
<b>Urban Area</b>	<b>Population 2004</b>	<b>% of Urban Area Total</b>
Spalding	24137	55.4%
Crowland	3695	8.5%
Holbeach	7413	17.0%
Long Sutton	4920	11.3%
Sutton Bridge	3417	7.8%
<b>Total Urban Areas</b>	<b>43582</b>	<b>100%</b>
Donington	2108	4.8%

4.3 The Council is not advocating an approach which allocates development directly in proportion to population size. However, if it were, then the alternative figures in the table above generally lend greater weight to the distribution set out in the Plan than do the figures provided by Allisons which are for wards. Nor is the Council advocating the use of a non-implementation allowance. This is explained in the Housing Topic Paper (CD/SH/32) at paragraph 5.3. These matters will be

discussed further in the Council's submission for the Housing Round Table Session.

- 4.3 In general terms, the Plan's proposals are consistent with the underlying strategy. This is set out in the Topic Paper at paragraphs 5.3.5 to 5.3.9. The Council is responsible for delivering sustainable development, which entails locating residential development close to existing employment, social, educational and retail and commercial services, in order to create inclusive communities and minimise the need to travel, especially by car. Therefore most development will be allocated in towns. Growth is allowed for in other types of settlements, according to the range of services available.
- 4.4 Section 7 of the Topic Paper discusses the consideration of flood risk. It is important in this context to recognise that whilst the Council's Strategic Flood Risk Assessment (CD/SH/12) has informed preparation of the Plan's policies and proposals, flood risk is one of many considerations which the Council has sought to consider and, where necessary, balance in arriving at the allocations made. The Council takes the matter of flood risk seriously and is seeking to deal with it in a way that has regard to real risk. Where flood risk has been raised as an objection to specific allocations, the Council's position will be explained in our responses to those specific objections. The Government has just published Draft Planning Policy Statement 25 "Development and Flood Risk" for consultation. Annex D of Draft PPS25 sets out the proposed Sequential Test and Exception Test. This would appear to provide a basis for assessing plan proposals as part of preparation of the Local Development Framework (and in the interim a means of assessing planning application proposals) where they could be vulnerable to flooding. It is however the Council's view that for that purpose it is appropriate for us to refer to the flood risk zones in our SFRA, which take into account existing flood defences.
- 4.5 The settlements are suitably ranked within the settlement hierarchy. The Council's reasoning is set out in section 6 of the Topic Paper.
- 4.6 Paragraph 6.4 of the Topic Paper refers to Donington. Inclusion of Donington as an Area Centre has not prejudiced compliance with the Structure Plan. We have

- been issued with a Statement of General Conformity by the County Council and the Plan's housing provisions will achieve the necessary urban-rural split. Broadgate's objection to the status accorded to Donington will be addressed in response to that specific objection.
- 4.7 Deeping St Nicholas is referred to at paragraph 6.15 of the Topic Paper and Weston at paragraph 6.17. These two villages and the village of Cowbit are promoted for an appropriate level of growth.
- 4.8 The relationship between Pinchbeck and Spalding, and the matter of the future of the 'gap' between the two settlements, will be addressed through the preparation of the Area Action Plan for Spalding as referred to in Pre-Inquiry Change PIC 17. This will enable full community involvement in looking at 'options' from the outset. With regard to the extension of the Holland Park development in Spalding, this is bringing into the Plan proposals relating to a strategy for development which has been referred to in previous Local Plans, which were consulted on. Delivery of the Plan's proposals is important to the strategy to increase the urban (and particularly the Spalding) percentage of new housing.
- 4.9 The locations of homes and jobs are suitably related. This is explained in paragraph 5.3.17 of the Topic Paper and is expanded upon generally within the Economy Topic Paper (CD/SH/31) and the Housing Topic Paper (CD/SH/32).

**Topic 3. Is it appropriate to restrict development in the Other Rural Settlements by removal of defined settlement limits?**

**5.0 Summary of Other Participants' Position Statements**

**5.1 Smith Stuart Reynolds on behalf of Allison Homes (PS/638/CS)**

Yes it is appropriate. It should be borne in mind that development in the Area Centre of Donington will be part of the Structure Plan's 'rural' provision.

**5.2 Graham Warren Partnership on behalf of Broadgate Homes (PS/655/CS)**

Yes it is appropriate.

**6.0 Position Statement and Response of the Council**

6.1 The Council's justification for restricting development in the Other Rural Settlements by removal of defined settlement limits is explained in the Core Strategy Topic Paper (CD/SH/30) at paragraph 5.3.8.

6.2 Defined settlement limits (previously known as development boundaries) are a historic policy tool that has been in use in a number of statutory and non-statutory plans for many years in the District. What we have done in the Redeposit Plan is seek to start again, only defining such boundaries where necessary in the current policy context. We have redefined boundaries if necessary where they are retained and not defined boundaries where they are not required, in order to avoid confusion.

6.3 In the Other Rural Settlements speculative building (as opposed to development to meet a demonstrated local need) will not be appropriate. The absence of boundaries removes any presumption in favour of development inside the settlement. The developer has then to justify the need for the development as well as its proposed form by reference to the other policies of the Plan. This is a more flexible approach, which leaves open the possibility of development to fulfil genuine local needs, while fully testing the proposals.

- 6.4 The housing provision for Donington will indeed contribute towards the 'rural' provision required by the Structure Plan. This is the approach taken in the Plan and in our monitoring information.
- 6.5 The reference made in paragraph 3.2 of Broadgate's statement to "Whaplode" should presumably read "Whaplode Drove". To clarify the Council's position on the matter discussed by Broadgates in that paragraph, we do not envisage permitting infilling with general needs housing outside settlement limits. There could be significant cumulative effect of such proposals, which would not represent sustainable development.

**Topic 4. Is Policy SG6 consistent with national policy on planning obligations? Is it an adequate basis on which to base negotiations? If not, should this be expanded upon in the Plan or in a Supplementary Planning Document?**

**7.0 Summary of Other Participants' Position Statements**

**7.1 Smith Stuart Reynolds on behalf of Allison Homes (PS/638/CS)**

Requests that the reference to impact assessment needing to be submitted by developers be removed. Agree that SPD is appropriate as long as there is full consultation in its preparation. Concerned though that the proposed Infrastructure Needs Assessment will require developers to make up general deficiencies.

**7.2 Graham Warren Partnership on behalf of Broadgate Homes (PS/655/CS)**

The Plan must not get bogged down in detail. Object to the list of potential infrastructure in the Plan, which is too prescriptive. Agree that the policy should set out the basic principle. SPD can be used to identify principles for negotiation, including how competing demands will be prioritised, although it cannot identify the specific infrastructure needs.

**8.0 Position Statement and Response of the Council**

8.1 Policy SG6 (as amended by Pre Inquiry Change PIC 19 in response to objection by Government Office East Midlands) is, we believe, consistent with national policy on planning obligations. The Council's position is explained in the Core Strategy Topic Paper (CD/SH/30) at paragraphs 5.3.12 to 5.3.15.

8.2 We consider that Policy SG6 (as amended) is an adequate basis on which to base negotiations as far as the Plan itself is concerned. However, this will be expanded upon in a Supplementary Planning Document on Developer Contributions, the preparation of which is included in our Local Development Scheme (CD/SH/01) with community involvement part of the programme. In our

LDS we have also identified the need to prepare an Infrastructure Needs Assessment. This will not be SPD but a technical assessment prepared as part of the Evidence Base to inform our Local Development Framework.

- 8.3 In the area of Affordable Housing we already have SPG, further revised and developed recently (CD/SH/25). This is proving to be a useful document.
- 8.4 The list of infrastructure included in paragraph 3.39 of the Plan simply provides examples of the type of obligations that could be sought. This is stated expressly. In this context it is appropriate and useful to include the list. Whether a request meets the test of reasonableness cannot be judged now, but only in the circumstances of individual cases. Para. 3.37 acknowledges the need for planning obligations to meet the requirement criteria in Government guidance. Infrastructure can only be required if it is essential in order for that development to be able to go ahead and to obtain planning permission. In practice, the developer will need to build up an understanding of the impact of his proposal on community infrastructure as part of pre-submission negotiations.
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