

## 4. HOUSING

### 4.1 HOUSING: AN OVERVIEW

#### Background

4.1.1 The initial context for the Plan is the housing strategy of RPG8 which, in 2002, introduced an overall policy of restraint in Lincolnshire, seeking to discourage unsustainable patterns of in-migration and commuting. The then current housing requirement for Lincolnshire was reduced by 18%, which was translated by the LSP to an overall requirement of 7,600 new dwellings in South Holland in the period 2001-2021. Not only has the total requirement been reduced but the proportion to be distributed to the Rural Area has been reduced to 25%. This is to encourage a more sustainable and focused pattern of development than the scattered widespread provision seen in the recent past. The distribution of 75% to the Urban Area is intended to reflect the service and employment roles of the larger settlements and to maintain their prosperity.

#### The Adequacy of the Housing Land Supply: Quantity

4.1.2 The Council's approach to meeting the housing requirement has first been to examine the number and distribution of existing completions during the first years of the Plan period from April 2001 to April 2005. The commitments, in the form of outstanding planning permissions, have then been assessed. As part of this process, the Council has decided to refuse to renew planning permissions in unsustainable locations. The most significant impact of this is the refusal to renew permission for 290 dwellings on a greenfield site on the periphery of Sutton Bridge. The policy of refusing to renew permissions for market housing in the rural area appears, not surprisingly, to have led to a high rate of implementation of these permissions and therefore the reduction in housing numbers attributable to this process is not likely to be significant.

4.1.3 In the Urban Areas, there is not the same imperative to develop; some of the sites may be more difficult and there is more likely to be a degree of non-implementation. A discount of around 10% has been suggested by objectors to take account of this factor, an approach resisted by the Council. On balance, I support the Council's approach, having regard to the inclusion in the Plan of a policy to monitor and manage the provision of housing; this should enable any potential shortfall to be addressed in a timely manner.

4.1.4 The next stage has been the carrying out of an Urban Capacity Study (UCS) [CD/SH/13] to assess the potential output from the existing urban areas. The UCS is a major component of housing provision in a number of settlements and it is fundamental to the integrity of the Plan that its findings are realistic. I am satisfied that the methodology generally conforms to the advice of PPG3 and "Tapping the Potential" (CD/GO/28). However, a number of criticisms have been levelled at the UCS. One of these was that public open space was included. However, the UCS is 'policy neutral' in looking at *all* potential sites within the settlement boundaries. The procedure of discounting the anticipated output of sites took account of their use and likelihood of being developed; for example, public open space was discounted by 100%. Although both brownfield and

greenfield sites were assessed in the UCS, the relevant Plan policies have regard to the sequential test and give appropriate priority to brownfield land.

- 4.1.5 Other criticisms of the UCS include a lack of market analysis and consultation. However, the actual output from identified sites in the early years of the Plan period has been broadly consistent with that anticipated by the UCS, lending support to my view that the UCS is a suitably robust and reliable document. Whilst it is likely that the 'easier' sites will have come forward first, it is also the case that significant numbers of additional dwellings have emerged on sites not identified in the UCS. Therefore, I do not see this simply as a short-term source of housing provision.
- 4.1.6 The Council's most recent calculation of housing provision, based on the situation as at April 2005 is found in Docs.CD/SH/36 & 55(as amended). I summarise it below:

	Completions (2001-05)	U/C*	With pp (but not u/c*)	UCS	Allocations/ Allowance**
Main Town	841	255	1563	403	1311
Area Centres	581	127	287#	584	330
Group Centres	615	21	83	-	200
Other Rural Settlements	408	60	121	-	80
Open Countryside	81	24	15	-	40
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	2526	487	2069	987	1961
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\* Under construction

\*\* Allocations in the Main Town and Area Centres; Allowance for the remaining categories.

# This figure allows for the non-renewal of permission for 290 dwellings at Sutton Bridge

- 4.1.7 The Council's total anticipated provision 2001-2021 would be some 8,030 dwellings, compared to the LSP requirement of 7,600. This represents a surplus of some 430 dwellings, or around 5.7%. My recommended addition of some 80 dwellings at Long Sutton would raise this to around 6.7%. I find this total to be within tolerable limits. Most of the 'surplus' would be in the Urban Area; the Urban/Rural split would be 6,201/1,909, compared with the LSP requirement of 5,700/1,900. This should allow some flexibility in the Urban Area if the non-implementation of planning permissions is substantially higher than anticipated and/or if the output of the UCS sites begins to slow down in the medium to longer term. The monitoring and management process should be capable of ensuring the delivery of dwellings is not significantly greater than is desirable.
- 4.1.8 On the basis of the LSP annual requirement of 380 dwellings per annum, the dwellings under construction, together with planning permissions, would account for around 6.7 years' supply. The allocations plus the anticipated UCS output would extend the supply beyond 2021, at the same rate of development.

### **The Adequacy of the Housing Land Supply: Location and Quality**

- 4.1.9 The LSP requires the distribution of housing to be in the ratio of 75:25 between the Urban and Rural Areas. However, completions in the early years of the Plan period have been disproportionately high in the Rural Area; some 45% of the total completions 2001-2005 have occurred in this area, and the bank of extant planning permissions will undoubtedly continue to distort the provision. The Plan's strategy takes this into account

by imposing considerable restraint on market housing in the Rural Area, including the refusal to renew planning permissions in unsustainable locations. Furthermore, the Plan now omits defined settlement limits from a number of the smaller settlements which lack an appropriate level of services and facilities to sustain the community. Many of these are very loose-knit settlements and, if such boundaries give the wrong impression that development would be allowed therein, they serve no useful planning purpose; I support their omission.

- 4.1.10 The above process of restraint appears to me to be the correct response to the regional strategy, which promotes a significant shift of balance from the Rural to the Urban Area. The above table indicates that an allowance has been made in the Group Centres, Other Rural Settlements and the Open Countryside for an appropriate level of housing provision envisaged via Policies HS6, HS7 and HS9; the last of these would permit additional housing to meet identified local need.
- 4.1.11 Within the Urban Area, a number of objectors have criticised the Plan's housing strategy as being too focused on Spalding and Holbeach. The 'pro-rata' distribution of new housing in line with existing population has been promoted and I deal with this matter in section 3.1 above. There, I conclude that the Plan's approach is sound.
- 4.1.12 Within Spalding itself, it is argued that the small number of large allocations will result in too much new development being under the control of a limited number of developers. However, although the Wygate Park sites are allocations, they must be regarded as commitments, as they already have planning permission for around 970 dwellings; this represents a substantial proportion of the total of 1563 dwellings in Spalding with planning permission. Holland Park would account for the remaining allocation total of 1311 dwellings. However, it forms part of a sustainable urban extension which will provide much needed community infrastructure and affordable housing to the town. It would be unrealistic to expect such provision to be made by way of small-scale or piecemeal development. The urban extension needs to be planned as a whole to ensure its coherent development.
- 4.1.13 The Plan's housing strategy appears to me to achieve a sustainable distribution of housing overall, in line with the strategic guidance, and a sufficient level of house building to meet local needs in the main settlements and larger villages. It would not be consistent with the strategic background to permit additional market housing in the rural area simply as a means of generating affordable housing.
- 4.1.14 In terms of quality, the Plan includes policies which should ensure that development is of high quality and is appropriate to its local context. I have seen nothing to indicate that the Plan will not support the provision of an appropriate range and mix of house types.

#### **Reserve/ Post-2021 Land**

- 4.1.15 IC9 would replace 'post-2021 land' with 'reserve land' within the urban extensions of Spalding and Holbeach. As indicated above, I believe it important to give the certainty that the land in question will come forward in due course, so that the necessary infrastructure can be properly planned and implemented in a logical and economic manner. The reserve land would only be brought forward should the delivery of housing fall significantly behind the required rate. In these circumstances, I support the inclusion of reserve land in the Plan.

#### **Affordable Housing**

- 4.1.16 The shortage of affordable housing is acknowledged to be an acute problem in South Holland. The Council has carried out a detailed, and to my mind robust, Housing Needs Assessment and calculates that there remains a projected requirement for an extra 269 affordable homes annually from 2004, for at least 5 years, in order to meet the backlog of unmet need and to address newly arising need over that period. It appears unlikely that the backlog will be cleared in that time and therefore, there would be likely to be a continuing need for more than the 155 or so homes required annually to meet newly-arising need.
- 4.1.17 Evidence at the Housing Round Table Session demonstrated that affordable housing provision is being made by 3 routes - direct provision by the District Council, provision by Registered Social Landlords or Charities and provision by private developers via the planning process. The Plan encourages and enables provision by the first 2 routes, either on suitable sites within the settlements or by way of the rural exception policy (HS9). The Council was able to show that affordable housing is being produced from such sources, both in the smaller settlements and in Spalding where, for example, a scheme of 60 dwellings is about to commence. The third route, the requirement to provide affordable housing, as a proportion of the total housing on a site, arose for the first time in November 2001, in the First Deposit Draft version of the Plan. Because of this, the delivery of affordable housing via this route is only recently starting to achieve any significance. The hang over of planning permissions granted before this time will make no contribution, as will new development below the relevant threshold.
- 4.1.18 The requirement in Policy HS8 for one third affordable housing on all new housing schemes above the relevant threshold is designed to help to address both the shortfall and the newly arising need. Although the Policy is framed such that the one third requirement would last throughout the Plan period, thereby potentially producing a surplus of affordable housing in the later years, I see no need to amend the Policy; the forthcoming LDF should be capable of monitoring and reviewing this matter.
- 4.1.19 The affordable housing shortfall is spread across all parts of the District. Although most of the new housing, and consequently most of the affordable housing, will be focused on the 2 largest settlements of Spalding and Holbeach, regard must be had to the needs of all areas. Policy HS9 would address this, in part, but I am persuaded that the unusually low threshold (sites of 3 or more dwellings or 0.1 ha or more) in Policy HS8 is justified because of the acute need and the particular characteristics of this rural area. I see parallels here with the situation in West Lindsey where the Local Plan Inspector concluded that to seek no contribution from other than the main settlements would both fail to tap a potential supply of some significance and greatly restrict the prospect of making any response to need in the most convenient location (CD/OP/08).

## Conclusions

- 4.1.20 In brief, my conclusions are:
- i. that there is an adequate supply of housing land in both quantitative and qualitative terms to meet the LSP requirement in accordance with the Plan's strategy.
  - ii. The distribution of housing is acceptable, having regard to the desirability of promoting the most sustainable form of development within Spalding and the Area Centres and of helping to sustain the rural economy.
  - iii. I have some concern that the supply of affordable housing provided via the planning process may fail to address the acknowledged shortfall in the short term.

However, the relevant policy (HS8) has only been in place for a short period of time and, although there is some cause for optimism, its impact needs to be properly assessed before recommending any significant amendments. (There are, of course, other means of providing affordable housing, as the Council has pointed out.)

- iv. The release of additional land, other than to meet exceptional local needs for affordable housing, as provided for in Policy HS9, would therefore unacceptably conflict with the Plan's strategy.
- v. The identification of reserve land at both Holland Park, Spalding and to the west of Holbeach is desirable as an integral part of promoting sustainable and properly planned urban extensions, with the appropriate infrastructure.

4.1.21 My conclusions in this section of the report will underpin my recommendations on the site-specific objections.

## 4.2 HS – GENERAL

### Objections

See Appendix A7

### Issues

- a. Whether or not the housing strategy is appropriate to deliver a sustainable distribution of housing to meet needs in the main settlements and villages. Whether village boundaries should be restored to the smaller villages in order to allow some development.
- b. Whether the settlement hierarchy is appropriate.
- c. Whether or not there is an adequate supply of housing sites in terms of distribution and location.
- d. Whether five principles for housing provision should be included to underpin Chapter 4.
- e. Whether the plan should include a policy on housing density.
- f. Whether the plan should include a policy for determining renewal applications.
- g. Whether the plan should make allowance for greenfield windfall sites.
- h. Whether a new policy relating to an Empty Homes Strategy and text regarding accessible homes should be inserted.
- i. Whether para.4.64 of the First Deposit Draft should be re-included in the Plan.

### *Site-specific Objections*

A large number of objections have been listed under "HS – General" which relate to individual settlements or to specific sites within, or adjoining, settlements. To avoid repetition, these will be dealt with, by settlement, under Policy HS3. Relevant consideration is also found under the appropriate policy heading for the category of settlement - ie. HS4 for Spalding, HS5 for the Area Centres, HS6 for the Group Centres and HS7 for the Other Rural Settlements

### Inspector's Reasoning and Conclusions

4.2.1 **Issues a – c.** In sections 3.1 and 4.1 of this Report, I conclude that the Plan's housing

strategy is consistent with the regional and strategic guidance to focus development on Spalding and the larger settlements and to restrain development in the rural area. I accept the settlement hierarchy, as set out in Policy SG3 and have seen no compelling evidence to suggest that there should not be an adequate supply of housing sites in terms of quality, range and distribution.

- 4.2.2 Many rural settlements have seen an unprecedented level of growth in recent years. Some 44% of completions between 2001-05 were in Group Centres or smaller; the vast majority of these were open market housing. I support the removal of defined settlement limits from the less sustainable settlements as an appropriate response to secure the aim of restraint. There is no intention of restraining housing for essential local needs and the Plan makes explicit provision for such housing to come forward to help sustain rural communities.
- 4.2.3 Some objectors appear to have misunderstood the purpose of defined settlement limits in the Group Centres and larger settlements. Their prime function is as a policy device to define the desirable area for development, rather than simply to define the built form of the settlement; as such, they must have regard to the overall housing requirement set out in the LSP.
- 4.2.4 **Issue d.** The principles articulated by the objector are laudable. Those that are rooted in land use planning are however satisfactorily covered elsewhere within the Plan; those that are not have no place in the Plan – although certain aspects may sit more comfortably within the new spatial planning system. The objection has prompted the Council to add ‘fenland’ to describe the reference to ‘landscape’ within para.6.2 (Chapter 6: IC18) and I have no objection to that.
- 4.2.5 **Issue e.** The guidance on minimum density in PPG3 is reflected in Policy H3 of the LSP, which forms part of the development plan; more detailed guidance would be inserted into para.4.15 of the Plan by way of PIC29. Together, these provide sufficient basis for the Council to achieve the housing density sought by national policy.
- 4.2.6 **Issue f.** Para.4.21 sets out the Council’s position on renewing planning permission, in a manner consistent with the advice of PPG3. I see no need for a policy on this matter. Any application should be dealt with on the basis of the development plan at that time, together with any material considerations.
- 4.2.7 **Issue g.** The UCS quite properly takes account of *all* potential windfall sites. However, it uses the process of discounting to take account of sites which are in other valuable uses; for example, playing fields are usually discounted by 100%. By way of PIC33 and the subsequent IC10, the sequential test would be introduced to Policy HS5, placing brownfield windfalls before greenfield windfalls in the Area Centres. I see no reason why this sequential test should not also apply to Spalding; LSP Policy S2, which requires the suitability of previously developed land to be assessed before Greenfield sites, applies equally to Main Towns and Small Towns. I shall recommend an amendment to Policy HS4 accordingly.
- 4.2.8 **Issue h.** While the number of vacant properties in the housing stock can be an important aspect of planning for housing, bringing empty property back into use is essentially a housing function. Indeed, the Council is seeking to produce an Empty Homes Strategy by the end of March 2006 as part of its Housing Strategy, which appears to me the means by which the objector’s concern would be addressed. In the absence of any detailed information on this matter to suggest otherwise, I see no a need for a specific planning policy on this subject. As for the suggestion that the Council introduce a register of accessible homes, that has no relevance to the Plan. I recommend no

amendment on either count.

- 4.2.9 **Issue i.** PIC15 would introduce appropriate text to Policy SG1, setting out the value of some derelict sites for nature conservation. This appears to meet the objection.

## **RECOMMENDATION**

### **R.4.2. I recommend no amendment to the Plan.**

## **4.3 HS1 – THE HOUSING REQUIREMENT**

### **Objections**

See Appendix A8

### **Issues**

- a. Whether Policy HS1 is suitable or unduly inflexible.
- b. Whether the plan provides sufficient land for housing to meet the Structure Plan requirements.
- c. Whether the Plan should include further tables setting out the current housing elements.
- d. Whether the Urban Capacity Study provides a robust assessment of the likely delivery of housing.
- e. Whether deduction figures to take account of demolished dwellings should be included in tables.
- f. Whether the plan should include a non-implementation allowance.
- g. Whether the Plan should identify reserve housing sites.
- h. Whether paras.4.16 and 4.17 of the Plan are unnecessary and should be deleted or amended.
- i. Whether the settlement hierarchy is appropriate and whether or not the housing strategy is appropriate to deliver a sustainable distribution of housing to meet needs in the main settlements and villages.
- j. Whether the Plan provides for sufficient future growth in the Other Rural Settlements and whether it is appropriate to remove defined settlement limits.

### ***Site-specific Objections***

A large number of objections have been recorded under “HS1” which relate to individual settlements or to specific sites within, or adjoining, settlements. To avoid repetition, these will be dealt with, by settlement, under Policy HS3. Relevant consideration is also found under the appropriate policy heading for the category of settlement - ie. HS4 for Spalding, HS5 for the Area Centres, HS6 for the Group Centres and HS7 for the Other Rural Settlements

## **Inspector's Reasoning and Conclusions**

- 4.3.1 **Issues a - g.** The nature of Policy HS1 is to ensure that the LSP housing requirement is delivered. It is not open to the Plan to amend that requirement and it is common sense for the Plan period to follow that of the LSP. I appreciate that some objectors see this as a ‘straightjacket’. However, the position will be reviewed in the forthcoming Local

Development Framework (LDF), in the light of the then current Regional Spatial Strategy.

- 4.3.2 My conclusion in section 4.1 of this report is that there is sufficient land to meet the LSP requirement. In fact, by my estimation, there would now be a surplus of some 510 dwellings or 6.7% of the total. I am content with this small apparent surplus for 3 reasons. First, it allows some flexibility for non-implementation of existing planning permissions in the Urban Areas (non-implementation in the Rural Area is likely to be negligible, given the threat of non-renewal). Second, although I am content that the UCS is robust, largely based on the output of UCS sites matching or exceeding the predicted level, there is inevitably a tendency for the 'easier' sites to come forward soonest and it is conceivable that there could be some slowdown from this source in the later years of the Plan period. Third, the Plan includes a policy to monitor and manage housing delivery; this should be capable of ensuring the LSP requirement is not greatly exceeded. An explicit 'flexibility' or 'non-implementation' allowance, with objectors' suggestions varying between 10% and 30%, is not necessary.
- 4.3.3 Nor do I find any compelling argument for the identification of reserve housing sites, save for the case of the 2 proposed urban extensions at Holland Park, Spalding and west of Holbeach. In those cases, the proper planning of the urban extension and its necessary infrastructure requires the whole of the developable area to be identified, even though it may not be developed in the Plan period. The general identification of reserve housing sites is not necessary, given that Policy HS2 provides for monitoring and management of housing provision and that the Plan will be the subject of a fairly early review in the forthcoming LDF.
- 4.3.4 The basis on which the housing requirement is addressed is set out in the Plan in the table following para.4.13 and in Appendix 1 (amended as per PIC78, IC22 & IC47). This appears to provide sufficient clarity. Further information is readily available in the Council's publicly available UCS and Annual Monitoring Reports. In this area, the impact of demolition would not appear to make a substantial difference to the housing requirement. However, the UCS appears to take account of demolished dwellings, in calculating net additional housing on any relevant site.
- 4.3.5 **Issue h.** Paras.4.16 and 4.17 sensibly allow for additional housing provision where there would be clearly identified benefits to the community, as listed. I see no reason for an explicit policy to this effect, as the circumstances are likely to be exceptional. The additional criteria suggested by the objector concerning public transport and other sustainability criteria are already covered by Policies SG1 and SG2. Therefore, I support this text, as proposed to be amended by IC7. It can not have been intended that this source of housing would be of a strategic nature or be so large in scale as to have a significant impact on overall housing provision. However, any such case should be treated on its merits, balancing the range of benefits proposed with any harm to the housing strategy.
- 4.3.6 **Issues i – j.** These matters are dealt with in sections 3.1 and 4.1 of this report. I am content with the housing strategy and the restraint of market housing in the Other Rural Settlements, including the removal of defined settlement limits.

## RECOMMENDATION

**R.4.3. I recommend that the Plan be amended in accordance with IC7, IC22 and IC47.**

## 4.4 HS2 – MONITORING AND PHASING OF HOUSING

### Objections

607/002	R	A G Worth Esq
608/002	R	Parigo Horticultural C Ltd
638/005	R	Allison Homes Eastern Ltd
654/009	R	Councillor P M Walls
686/008	R	HBF

### Issues

- a. Whether the Plan provide sufficient guidance to allow the proper monitoring and management of housing provision.
- b. Whether or not Policy HS2 should be amended as suggested by the objector.
- c. Whether Policy HS2 is too prescriptive.

The 2 site-specific objections (607/002 and 608/002) have no bearing on this policy; they are dealt with in section 4.5 of this Report, under Spalding and Long Sutton.

### Inspector's Reasoning and Conclusions

- 4.4.1 **Issues a – c.** Policy HS2 is vital to the plan, monitor and manage approach advocated in PPG3. It needs to ensure that housing completions are broadly consistent with the LSP's annual requirement. There will necessarily be variation in output each year but the Policy needs to be able to respond if monitoring indicates variations of such significance as to harm the Plan's housing strategy. This is seen by one objector as too prescriptive and potentially harmful to the local house building industry. However, it is a necessary response to the LSP, which seeks restraint in the District as a whole, particularly in unsustainable rural locations. The division into 2 phases reflects the lower housing requirement post-2011.
- 4.4.2 Policy HS2 and its reasoned justification would be substantially amended by PIC30 and IC8. Chapter 9 of the Plan, on Implementation and Monitoring would also be amended by PIC76 & PIC77. The result would be a clearer explanation of the monitoring process, including the Annual Monitoring Report and the annual update of the UCS. The re-wording of the Policy itself would make it more effective in being able to resist proposals which would result in significant over-provision of housing or, conversely, in bringing forward additional land in the event of a substantial shortfall.
- 4.4.3 Objections in relation to Policies HS6 and HS8 below point to the need for greater sophistication in monitoring the Rural Area to avoid a significant imbalance between settlements in different parts of the District. I recommend additional text in para.4.19 to deal with this matter.

### RECOMMENDATION

#### **R.4.4. I recommend that the Plan be amended:**

- i. in accordance with PIC30 and IC8; and**
- ii. by adding to the end of para.4.19:**

**“As the housing requirement for the Rural Area is necessarily restricted and is expressed globally, there is a danger that it could be ‘used up’, such that some**

**remaining settlements would have no development potential. In order to meet the needs of the whole of the Rural Area, the monitoring process will take account of the distribution of rural housing. It will also take account of the identified need for affordable housing across the whole of the Rural Area.”**

## **4.5 HS3 – NEW HOUSING ALLOCATIONS**

### **Objections**

See Appendix A9

### **Issues**

- a. Whether or not the housing strategy of the plan is appropriate, in allowing greenfield development.
- b. Whether the plan places too much reliance on windfall sites and whether the Urban Capacity Study methodology is appropriate.
- c. Whether or not the table to Policy HS3 needs amending.
- d. Whether the phasing of large sites is appropriate.
- e. Whether paras.4.26, 4.29 & 4.32 need amending.
- f. The appropriateness of the Holland Park allocation.
- g. The appropriateness of the allocation adjacent to the A151, Holbeach.
- h. The appropriateness of the allocation at Foxes Lowe Road, Holbeach

### ***Site-specific Objections***

The remaining objections seek the allocation of specific sites for housing, or reserve housing, or they seek the inclusion of specific sites within the settlement boundaries of a range of settlements. I shall deal with these and with issues f – h below, in alphabetical order of settlements, within the appropriate level of the settlement hierarchy.

### **Inspector's Reasoning and Conclusions**

- 4.5.1 **Issues a & b.** The Plan's housing strategy reflects the priority to be afforded to developing brownfield land before greenfield land. The UCS is an integral part of this approach and, in section 4.1.5 above, I conclude that the UCS methodology is sound. Having reached this conclusion, and having seen evidence that the actual output of dwellings from this source is matching the UCS' expectations, I do not regard the Plan's reliance on windfall sites as excessive. It is part of the sequential approach that this source of housing is allowed for before considering allocations. However, the characteristics of the main settlements in South Holland are such that there is only a limited supply of brownfield land. The UCS allows for both brownfield and greenfield sites but, in order to meet the LSP requirement, there is no reasonable alternative to the allocation of further greenfield land. I am satisfied that the sequential approach has been followed in allocating greenfield land in and adjoining the main settlements, rather than previously developed land in less sustainable locations.
- 4.5.2 **Issue c.** The table included in Policy HS3 aggregates the total allocations by settlement. I see no purpose in omitting the individual site totals this and, to aid monitoring, they should be included.

- 4.5.3 **Issue d.** If monitoring and management of the housing provision is to be effective, phasing of the output from the larger sites appears essential. Policy HS2 appears to me sufficiently flexible to permit the phasing to be modified, should there be a 'significant' disparity from the LSP requirement. I am content with the use of this term, as it allows a range of circumstances to be taken into account, notably the long lead-in times to certain sites.
- 4.5.4 **Issue e.** Para.4.26 would be amended by IC9. Although there is reference to the safeguarding of the provision of a rail halt, this is clearly not a pre-condition of development at Holland Park. Para.4.29 appears clear that both of the allocated sites in Holbeach will be required to contribute to a health centre; a site has been identified and the Council has resolved to grant planning permission, subject to a S106 Agreement. Para.4.32 would be deleted by IC9, reflecting the intention to allocate 'urban extensions', with 'reserve land' rather than 'post-2021' land, which I support.

### Main Town: Spalding

#### *General*

4.5.5 In sections 3.1 and 4.1 of this report, I endorse the Council's strategy for the quantum of housing development in Spalding. To achieve the required provision, housing allocations are proposed, having first taken account of existing commitments and then the UCS. The 2 large allocated sites at Wygate Park already have planning permission.

4.5.6 As at 1 April 2005, the situation in Spalding was:

Completed 2001-2005	841
Under construction	255
Sites with planning permission, not started	1563
Urban Capacity Study sites	403
Sites allocated under Policy HS3	1311
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	4373
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4.5.7 The total provision forms a large component of the LSP housing requirement, which will be met from this, and other, housing provision in the Plan. I find no reason for an increased level of housing provision in Spalding, whether by increasing Spalding's share of the total provision or by an absolute increase in the total provision. Although the Holland Park allocation represents a substantial proportion of dwellings yet to be commenced, it is not to my mind so large a proportion as to unduly distort the housing market, particularly bearing in mind the required phasing of the output from this site.

4.5.8 At section 3.5 above, I endorse the Council's approach of treating Pinchbeck separately from Spalding and of considering the combined treatment of the 2 settlements in the programmed Area Action Plan for Spalding.

#### *Allocated Sites: Spalding*

4.5.9 **Holland Park.** Holland Park is designed to be a sustainable urban extension of Spalding, creating a mixed community, with a wide range of community facilities. The northern part of the site has already been completed and adjoining areas are either under construction or have planning permission. Considerable investment in services and infrastructure has therefore already taken place and further commitments are in place.

The Proposals Map shows the location of the various components, including allocated housing land, post-2021 housing land, structural open space, community infrastructure and the western link road. However, the Council has now recognised the need for flexibility in the development of this planned urban extension, including the designation of reserve housing land. Accordingly, it has proposed IC9, which would treat the whole of the site as an 'urban extension', in which the detailed layout is to be guided by a development brief. I support this approach, which should help achieve the optimum layout of the overall site, taking account of the planned provision of infrastructure.

- 4.5.10 The benefits of the proposal include the provision of the western link road, 33% affordable housing and a range of community facilities; these would include a village/neighbourhood centre, healthcare facilities, a primary school, a religious centre, leisure facilities and open space. The scheme would be integrated into local walking/cycling routes and would be served by an extended bus service. The possibility of a rail halt is to be safeguarded. It would seem illogical and wasteful to fail to complete the western link road when so much of it is either built or committed. The main disadvantage appears to be the distance from Spalding's main employment area, to the north of the town, although the extended bus service is capable of taking this into account. Nevertheless, on balance, the benefits of the proposal appear to outweigh the disadvantages.
- 4.5.11 The Environment Agency's concern about the differing flood risk on the southern part of the site and the 'post-2021' land, and the desirability of adopting a sequential approach to site selection, is capable of being taken into account as part of the planning brief. However, bearing in mind that both sites are ultimately intended for housing development, the provision of the link road would, in this particular instance, be a matter of greater weight.
- 4.5.12 I conclude that Holland Park should be retained in the Plan as an allocated urban extension, in accordance with IC9 and IC32. I have seen no evidence of preferable alternative proposals which would accord with the Plan's strategy.

*Omission Sites: Spalding*

- 4.5.13 **Land at Pinchbeck Road, Spalding.** The objection relating to the Elsom Seeds premises, a brownfield site within the urban area, has been overtaken by events, as the Council has granted planning permission for residential development.
- 4.5.14 **Land at Millfield Nursery, Cradge Bank Road and the adjacent site to the North.** This is an area of sporadic housing and horticultural use and both sites are close to, but appropriately excluded from, the settlement boundary. Neither site is needed to meet the housing requirement as the Plan makes adequate provision for housing in more sustainable locations. Moreover, the Strategic Flood Risk Assessment indicates that the area is at risk of rapid inundation; these sites would be behind a number of other sites in the sequential approach.
- 4.5.15 **Land South of Coronation Channel and West of Spalding Drove.** This is a greenfield site of some 91.6 ha. It is not well related to the town, to which the Coronation Channel presently forms an effective boundary. The whole of the site would be capable of delivering around 2750 dwellings, far more than required to meet the LSP requirement, although a phased release would be capable of addressing an over-supply. There is no evidence that the range of community benefits associated with Holland Park can be provided and, in any event, Holland Park already enjoys a high level of commitment in terms of works completed, or under construction, and extant planning permissions. Therefore, I see no good reason to prefer this site to Holland Park.

Additionally, it appears that the highway authority considers there to be access problems for a site of this scale. Furthermore, the Strategic Flood Risk Assessment indicates part of the site to be subject to rapid inundation and therefore its allocation would appear to be contrary to the advice of PPG25, unless it can be demonstrated that the issue of flood risk can be addressed; I have seen no such evidence.

- 4.5.16 **Land to the South of Coronation Channel and East of Spalding Drove.** This 26.5 ha site contains a large former industrial unit and a number of poultry houses and is accepted by the Council as a brownfield site. However, as with the previous site, it is not well related to the town, to which the Coronation channel forms an effective boundary. The site would represent a strategic housing release and is not needed to meet Spalding's housing requirement. As above, I see no reason to prefer this site to Holland Park. Furthermore, the site is within Zone 3 (High Risk) in the Council's Strategic Flood Risk Assessment and is potentially subject to rapid inundation. Its allocation would be contrary to PPG25 unless it could be demonstrated that the flood risk issue could be properly addressed; again, I have seen no such evidence.
- 4.5.17 **Land at Burr Lane and Fen End.** There are a number of sites in this locality, adjacent to an outlying area of housing which was included within the settlement boundary in the Adopted Local Plan. The area is now quite properly excluded, being quite separate from the main settlement and lacking local facilities. None of the sites is needed to meet the housing requirement as the Plan makes adequate provision for housing in more sustainable locations
- 4.5.18 **Land at Luck's Bridge Nursery.** This greenfield site is close to the Holland Park urban extension and the A16. However, it does not appear capable of being integrated into the Holland Park scheme. The site is not needed to meet the housing requirement as the Plan makes adequate provision for housing in more sustainable locations, and/or with associated community benefits.
- 4.5.19 **Land adjacent to Little London Bridge.** This greenfield site abuts the settlement boundary. However, the site is not needed to meet the housing requirement as the Plan makes adequate provision for housing in more sustainable locations, and/or with associated community benefits.
- 4.5.20 **Land at Albion Street, Spalding.** This site of some 1.81 ha is the site of a former gasworks. As a brownfield site within the settlement boundary, it clearly has potential for housing development and has been identified as such in the UCS; residential use appears compatible with surrounding land uses. There is, however, an issue to resolve regarding flood risk; the site lies in Zone 3 (High Risk) of the Strategic Flood Risk Assessment and its allocation without first addressing this issue would appear to conflict with the advice of PPG25. Furthermore, given the nature of its previous use, the question of potential contamination needs to be addressed. I believe that Policy HS4 provides an appropriate framework for the development of this site and that there is no clear benefit in allocating it within the Plan.
- 4.5.21 **Land to the NW of St.John's Road, Spalding.** The site is around 1 ha and is partly in active use for car sales. It is within a predominantly residential area and has been identified in the UCS as a possible development site. The Plan has a perfectly acceptable framework for considering development of such sites in Policies HS4 and EC3 and I see no clear benefit in allocating this site for housing.
- 4.5.22 **Land to the NE of Coronation Channel.** This greenfield site comprises 7 parcels of arable land to the north of Springfields Outlet Centre, bounded by the A16 and the River Welland. In total, the area is 20.4 ha, capable of delivering over 600 dwellings. The

level of housing provision in the Plan is adequate for Spalding and the allocation of a site of this scale would require a consequent reduction at Holland Park. However, although this objection site is capable of delivering an appropriate level of affordable housing, that would be no different to Holland Park. Yet the site would not provide the range of other community benefits to be provided at Holland Park. Even though the site is close to the local facilities in Fulney and to the Spalding employment area, there are difficulties of access which would also appear to tell against its release. In conclusion, the site is not needed to meet the housing requirement as the Plan makes adequate provision for housing in more sustainable locations, and/or with associated community benefits.

- 4.5.23 **Land to the West of Holland Park and South of Horseshoe Road.** This 40 ha greenfield site would represent a strategic housing release, capable of delivering some 1200 dwellings. It lies on the far side of Holland Park from the town and, even were it to be considered an acceptable site, it would be illogical to develop a sequentially inferior site prior to Holland Park. It is not needed to meet the strategic housing requirement.
- 4.5.24 **Land adjacent to A16/A151 junction.** This site, to the east of the A16 Spalding bypass is clearly outside, and poorly related to, the settlement. Moreover, it would be a noisy residential environment because of the proximity to the major road network. The site is neither needed nor suitable for housing.

*Omission Sites: Spalding/Pinchbeck gap.*

*Although the following sites are north of Vernatt's Drain, and therefore technically in Pinchbeck, they are promoted as contributing to the housing requirement for Spalding. Other sites are dealt with under 'Pinchbeck'.*

- 4.5.25 **Land to the West of Spalding Road.** Three related objections cover 4 parcels of land which, together, comprise the northern half of the gap between Spalding and Pinchbeck, lying to the west of Spalding Road. Although described as a 'gap', much of the site lies to the rear of a ribbon of frontage development along Spalding Road. Nevertheless, development here would significantly reduce the openness of the land between the 2 settlements.
- 4.5.26 The sites are promoted as providing a counter-balance to Holland Park, serving the northern part of Spalding and being close to the major employment area. However, I am satisfied that Holland Park should be retained in the Plan as a desirable urban extension, providing a range of community benefits. The allocation of any, or all, of these objection sites would require a proportional reduction at Holland Park, as the Plan makes sufficient provision for Spalding. I recognise the proximity of the sites to the employment area and to local facilities in north Spalding and Pinchbeck. However, the underlying strategy for Spalding/Pinchbeck falls to be considered in the programmed Spalding Area Action Plan. That appears to me to be the proper place to consider the question of infilling the Spalding/Pinchbeck gap and the appropriate level of development for this immediate locality. On the basis of the present housing strategy, which I endorse above, the site is not needed to meet the housing requirement as the Plan makes adequate provision for housing in more sustainable locations, and/or with associated community benefits.
- 4.5.27 **Land to the North of Vernatt's Drain, around Blue Gowt Lane, Blue Gowt Drove and Mill Green Road.** Some 13 ha of enabling development, a significant area in the context of Spalding, is proposed as part of a major new golf and leisure centre. The site is beyond the settlement limit and, in its own right, the site is not needed to meet the housing requirement as the Plan makes adequate provision for housing in more sustainable locations, with associated community benefits. Therefore, I do not support

an allocation of the scale proposed. The merits of such a proposal, and whether there are exceptional circumstances to allow enabling development, should be assessed against the provisions of paras.4.16 and 4.17, as amended by IC7.

- 4.5.28 **Land to South of Wardentree Lane.** This is a 5.1 ha greenfield site, with a short frontage to Wardentree Lane; most of the site is to the rear of the long back gardens of housing fronting Wardentree Lane and Spalding Road. The site abuts the major employment allocation to the south and to part of its eastern boundary, the remainder being occupied by an additional unallocated parcel of land; although not part of the objection site, this latter parcel would sensibly be developed as part of the objection site. A number of suggestions have been made for the site, including devoting the whole site to affordable housing. However, it is a large site and such a proposal would not achieve a desirable mix of dwellings and a balanced community.
- 4.5.29 The objector's preferred option is to promote the site as a mixed allocation of housing and high quality business park, with an approximately 60:40 split between the two. The intention is that the housing would help fund the business park. However, in section 5.3 of this report, I conclude that the release of this site would be premature, pending the completion of the Spalding Area Action Plan. There are other suitable sites for the formation of a high quality business park and I do not support the allocation of this site either for housing or for a mix of housing and employment as part of the Plan.
- 4.5.30 **Land to North of Wardentree Lane.** There are 3 sites. The easternmost site of some 8 ha is allocated for employment. In section 5.3 of this report, I conclude it forms an important component of the employment land supply and should be retained for that purpose. Furthermore, it is not needed for housing and I do not recommend its allocation as such.
- 4.5.31 The central site measures 0.36 ha and is sited to the rear of a detached dwelling. It appears accessible only from the allocated employment land to the east and the objector consider it suitable for key worker or live/work units. The westernmost site measures 3.65 ha and its western part contains some buildings and hardstandings; this part is claimed to be previously developed land, as the original horticultural units are now used for potato 'chitting'. However, there has been no application for a certificate of lawfulness and I have seen no convincing evidence that such a certificate could be justified. Therefore, in the absence of such evidence, I shall treat both sites as greenfield.
- 4.5.32 These 2 sites form part of the gap which separates the settlement of Pinchbeck from the Spalding major employment area. Until the fundamental approach to this gap has been resolved by way of the programmed Spalding Area Action Plan, I regard the allocation of either of these sites as premature. They are not needed to meet the housing requirement for Spalding and I have seen no compelling evidence that they are preferable to the remaining uncommitted allocation at Holland Park.
- 4.5.33 **158 Spalding Road.** The objector seeks the de-allocation of this previously developed site from the major employment allocation. This would enable it to be considered for housing development under the terms of Policy HS4. Given its close relationship with adjacent housing, this appears reasonable. The Council agrees and has proposed IC31, which would meet the objector's requirement.

### **Area Centre: Crowland**

#### *General*

- 4.5.34 The Plan includes no housing allocations in Crowland. Instead, the intention is that the

required provision is made up of commitments and UCS sites. As at 1 April 2005, the situation in Crowland was:

Completed 2001-2005	191
Under construction	3
Sites with planning permission, not started	46
Urban Capacity Study sites	129
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	369
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This equates to around 6% of the housing in the Urban Area, whilst Crowland has around 8.5% of the Urban Area population. This is not so great a disparity as to diminish the role and function of Crowland as an Area Centre. Evidence at the inquiry indicated that brownfield sites were coming forward at an encouraging rate - 66 dwellings between 2004 and January 2006.

- 4.5.35 Importantly, Crowland is within easy commuting range of Peterborough. The RSS has identified the matter of cross-border commuting as an issue and the Council is taking part in an inter-District joint study which should inform the emerging RSS and, in turn, the LDF. I consider it would be unwise to prejudice any coherent policy on this matter by agreeing to any housing allocations in Crowland at this time.
- 4.5.36 As referred to above, the need for affordable housing will not be addressed on those committed sites which gained planning permission prior to the FDD Plan. However, the Plan now requires affordable housing on sites of 3 or more dwellings and provision should gain momentum and come forward at an appropriate rate. Allocation of housing land purely as a means of addressing the affordable housing issue would result in the over-provision of market housing compared with regional strategy. Moreover, there is provision in the Plan for developments entirely of affordable housing to be provided either on sites within the settlement boundary or, as an exception, on sites adjoining the boundary. The Council was clear that such routes for providing affordable housing are proving productive in the District as a whole and I see no reason why the needs of Crowland should not also be met in a like manner.

*Omission Sites: Crowland*

- 4.5.37 **Land to West of Clout Drove.** This greenfield site of some 3.3 ha (an additional area to the north is also included in some objections) is well located in relation to the neighbouring secondary school and the town centre and appears readily developable. Apart from the additional area to the north, the site appears well related to the urban form of Crowland. As the site is potentially subject to rapid inundation, it would fall below other potential sites in the sequential test set out in PPG25. However, it is conceivable that concerns could be allayed by a site-specific flood risk assessment. Nevertheless, as I have concluded that there is no need for additional housing to meet the housing requirements of Crowland, I do not support the allocation of this site.
- 4.5.38 **Land to East of Crease Drove.** This greenfield site of some 1.8 ha abuts warehouses to the north and housing to the east but is poorly defined to the south. It is not needed to meet the housing requirement for the area and there appears to be no reason to amend the settlement boundary in this location.
- 4.5.39 **Land adjacent to Harrington Drive and the A1073.** A significant part of this 2 ha site

is previously developed land, already within the settlement boundary, and potentially developable under Policy HS5. It would appear logical to continue the development of Harrington Drive to gain access to this part of the site, given the highway authority's apparent opposition to direct access from Peterborough Road. However, to do this would entail extending the development beyond the present settlement boundary into the grassed area adjacent to the A1073.

- 4.5.40 The Council considers this latter area to contribute to the character of the settlement, along with other undeveloped areas adjacent to the A1073 further to the north. However, I regard the contribution of this particular site as marginal, given the backdrop of housing, and consider that suitable landscape planting along the road could be almost as effective. The proximity of the site to the busy A1073 is a significant factor in terms of the acceptability of the living environment. I agree with the Council that typical noise bunds or acoustic fencing would be visually unacceptable.
- 4.5.41 However, the construction of the new route of the A1073 would have a significant bearing on the traffic noise to which this site is presently exposed. Whilst I understand from the newspaper article that was submitted by the objector that the new route has secured funding, and is hoped to be commenced in 2007, this has yet to be ratified by the Secretary of State. I therefore regard the inclusion of this site within the defined settlement limit as premature until this issue is resolved.
- 4.5.42 **Land South of Harvester Way.** The development of this 1.4 ha site would simply extend the settlement southward into the countryside. I regard the site as poorly related to the form of the settlement and, even were there a need for additional land to meet the local housing requirement, there would be other preferable sites, better integrated with the structure of the settlement.

**Area Centre: Donington**

*General*

- 4.5.43 The Plan includes no housing allocations in Donington. Instead, the intention is that the required provision is made up of commitments and UCS sites. As at 1 April 2005, the situation in Donington was:

Completed 2001-2005	28
Under construction	4
Sites with planning permission. not started	34
Urban Capacity Study sites	95
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	161
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This is equivalent to around 2.6% of the housing provision in the Urban Area, compared to Donington's population of just over 2,100 being equivalent to around 4.8% of the Urban Area population. It would, however, be some 8.5% of the Rural Area housing provision. This is not inconsistent with the role and function of Donington as an Area Centre, which historically has experienced a lower growth rate than other Area Centres. Evidence at the inquiry indicated that brownfield sites were coming forward at an encouraging rate - 22 dwellings between 2004 and January 2006.

- 4.5.44 I consider the level of growth envisaged for Donington to be appropriate and regard it unnecessary to recommend any housing allocations at this time.

*Omission Sites: Donington*

- 4.5.45 **Land North of Church Lane.** This strip of land, an undemarcated part of a larger field, was allocated for housing in the FDD Plan and appears capable of accommodating frontage development. It is close to the centre of Donington and would appear to be readily developable. However, in the light of my general conclusion above, the site is not needed to meet the housing requirement of the area.
- 4.5.46 **Land North of Quadring Road.** The frontage part of this small, greenfield site is within the settlement boundary. The main body of the site is part of a larger field on the eastern edge of Donington. I conclude above that there is no need for additional land to meet the housing requirement for the area and the site is therefore not needed.
- 4.5.47 **Land West of the A52, North of Park Farm.** This is an isolated site in open countryside and very poorly related to the structure and form of the settlement. Even were there a need for additional housing land, there would be other sequentially preferable sites in more sustainable locations.
- 4.5.48 **Land North of Town Dam Lane.** Most of this site, which is well contained by other development and is close to the centre of the settlement, is being developed as public open space, to be known as 'Flinders Park'. The future of the balance of the site, to the south of the park, is unclear and I have been given no information about ownership or availability. However, I see no need for additional housing land in Donington and therefore no purpose in including this greenfield site within the settlement boundary. However, the land to the west of the park, abutting Maple Way, appears to be previously developed land and, in such a central position within the settlement, it appears inconsistent to exclude this from the settlement boundary.
- 4.5.49 **Land South of Town Dam lane.** This 2.7 ha greenfield site was allocated for housing in the FDD Plan and is now promoted by the objector either as a housing allocation or as a reserve site. The site abuts the settlement limit, close to the primary school and the community centre, and within easy walking distance of the High Street. However, I have concluded above that there is no need for additional housing land in Donington and, save for the case of the 2 urban extensions in Spalding and Holbeach, no need for reserve land. Therefore I do not support the allocation of this site for housing or a reserve housing site.
- 4.5.50 **Land to the South of the above site, off Town Dam Lane.** This greenfield site contains a number of horticultural buildings. It adjoins the previous site but lies to the south (ie further from the centre of the settlement) and would be sequentially less acceptable in the event that additional housing land were being sought in Donington.
- 4.5.51 **Land off Malting Lane.** This 3.6 ha site abuts the settlement limit and is contained to the SW by the railway line and depot. Whilst it was within the settlement limit in the FDD Plan, I support its present exclusion in the light of my conclusion that there is no need for the allocation of additional housing land in Donington.

**Area Centre: Holbeach**

*General*

- 4.5.52 The Plan includes 2 housing allocations in Holbeach, in addition to the commitments and UCS sites. By way of IC9 and IC33, the area to the west of the town would be designated as an urban extension. However, although this may alter the detailed location of the housing intended to be developed in the Plan period, the quantity of housing would not be changed. As at 1 April 2005, the situation in Holbeach was:

Completed 2001-2005	128
Under construction	57
Sites with planning permission, not started	57
Urban Capacity Study sites	180
Allocations	300
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	722
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This is around 11.8% of the housing in the Urban Area, compared to Holbeach's population of almost 7,500 being equivalent to 17% of the Urban Area population. This is not inconsistent with the role and function of Holbeach as an Area Centre, which has experienced a high growth rate in the past 15 years. Evidence at the inquiry indicated that brownfield sites were regularly coming forward. I consider the level of growth envisaged for Holbeach to be appropriate and regard it as unnecessary to recommend any further housing allocations at this time. The urban extension to the west of the town would, in any event, contain reserve land which could be brought forward, if needed. Objectors have quite rightly made the point that significant new housing should not be allowed without the associated community infrastructure. However, I believe this matter is appropriately covered by Policy SG6 and should be covered further in the planning brief for the planned urban extension.

*Allocated Sites: Holbeach*

- 4.5.53 **Land to the West of Holbeach (adj.A151).** Although this site is envisaged in the Plan as a sustainable urban extension, the Proposals Map identifies the detailed location of each of the components, including housing, open space and community facilities. During the inquiry, it was recognised that the disposition of the various land uses was not necessarily satisfactory and that the urban extension as a whole would benefit from being developed more flexibly, in accordance with a carefully considered development brief. Accordingly, the Council has proposed IC9 which would simply treat the whole of the area as an urban extension, subject to a detailed development brief. It is important to note that, within the overall area, the amount of housing land to be developed within the Plan period would be unchanged. As at Spalding, I support the identification of reserve housing land in order that the urban extension can be properly planned and suitable provision made for its infrastructure from the outset. I regard the urban extension as a desirable approach to meeting the housing, employment and community infrastructure needs of Holbeach and believe that the approach now promoted by way of IC9 is most likely to achieve the Council's aim of a sustainable urban extension.
- 4.5.54 In the light of the above comments, the objection seeking the release of the whole of the urban extension site for housing is not supported. The objections seeking the release of parts of the site are also not supported; it is a matter for the forthcoming development brief to determine the precise location and form of the housing provision here, in conjunction with the other uses forming part of the urban extension, along with the timing of its release.
- 4.5.55 Representations have been made suggesting a buffer zone adjacent to the A151. However, the intended development brief would provide the appropriate vehicle for consideration of the disposition of the various land uses in relation, amongst other things, to the A151. I leave it to the Council to determine within that forum whether a buffer

zone is justified on environmental grounds.

4.5.56 **Land at Foxes Low Road.** This site, capable of accommodating some 150 dwellings, effectively comprises the final phase of the recent development to the south. It is contained on 3 sides by existing housing and appears to be readily developable. I have formed the view that the amount of new housing envisaged for Holbeach is appropriate and therefore, I see no justification for extending the site to the NE, toward the A17, or to the SE, toward Foxes Low Road.

*Omission Sites: Holbeach*

4.5.57 **Land at Wignal's Gate.** This objection has been overtaken by events. Planning permission has been granted for housing and construction has commenced.

4.5.58 **Land at Welbourne Lane.** This small greenfield site is to the north of the A17 and neither relates well to the urban form of, nor is it readily accessible to the services and facilities of, Holbeach. It is not needed for housing and, even if it were, it would be sequentially inferior to other sites.

4.5.59 **Land off Northon's Lane.** This is a brownfield site, well contained within the urban area, and is rightly included in the Council's Urban Capacity Study (UCS) for consideration as a potential residential development site, albeit that regard must also be had to the site's present employment use. The Council has adopted a practice of generally confining allocations to the larger, more strategic sites, believing that the relevant Plan policies (in this case HS5 and EC3) provide a suitable framework for sites such as this to be brought forward, if suitable. Indeed, the Plan makes allowance for windfalls to come forward to fulfil a substantial part of the housing requirement, an approach I find acceptable.

4.5.60 The reasoned justification to Policy EC3 would normally require evidence either of the lawful use giving rise to local environmental problems or that appropriate marketing has taken place to find alternative employment use. However, the representations made on these matters lack detail. Moreover, whilst the site appears to be free from undue flood risk, detailed development control issues, such as access, remain to be resolved. Therefore, I conclude that it would not be appropriate to recommend the allocation of this site for housing and that the other policies of the Plan are perfectly adequate as a basis for deciding any development proposals on this site.

4.5.61 **Land between Damgate and Barrington Gate.** This greenfield site of some 21 ha is on the periphery of the urban area, albeit fairly close to the town centre. However, its development would extend the urban area into what is presently open, agricultural land. Moreover, there appear to be access difficulties raised by the highway authority, which appear to be unresolved. Given its size and potential housing output, the site would have to be a substitute for either (or both) of the allocated sites. However, I see no compelling reason to prefer this site; it appears to offer no additional benefits, such as affordable housing, that would not already be provided on the allocated sites.

4.5.62 **Land between Damgate and Branches Lane.** There are 2 adjoining objection sites, both greenfield. Planning permission has been granted for a health centre on the frontage to Damgate. My comments on the previous site apply in general terms to these sites; the additional housing is not needed and the benefits would offer nothing that would not be achieved by developing the allocated sites. However, the development of either or both of the sites would represent a significant intrusion into presently open countryside.

**Area Centre: Long Sutton**

*General*

4.5.63 The Plan includes no housing allocations in Long Sutton. Instead, the intention is that the required provision is made up of commitments and UCS sites. As at 1 April 2005, the situation in Long Sutton was:

Completed 2001-2005	142
Under construction	6
Sites with planning permission, not started	59
Urban Capacity Study sites	125
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	332
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This equates to around 5.3% of the housing in the Urban Area, whilst Long Sutton has around 11.3% of the Urban Area population. Although I have resisted the direct use of such percentages to formally determine the distribution of new development, the above disparity indicates to me that the needs of Long Sutton are unlikely to be met if it is to continue to maintain its role and function as an Area Centre. A number of objectors raised concerns about the decline of shops and other services in the town. Evidence at the inquiry indicated that brownfield sites were continuing to come forward at an encouraging rate and criticism that there has been double counting of sites in both the Housing Land Availability Study and the UCS has been addressed in the latest figures reproduced above. Nevertheless, I consider it necessary to recommend a modest additional housing allocation in Long Sutton at this time, so that the housing needs of the town, including affordable housing, can continue to be met until the situation is reviewed via the LDF process. Although this would add to the modest over-provision of housing in the District, identified at para.4.1.7 above, this would not be such as to significantly distort the housing strategy. I believe the benefits to Long Sutton would outweigh the disadvantages of this modest over-provision.

*Omission Sites: Long Sutton*

4.5.64 **Land at Lime Walk.** This is a greenfield site with an area of some 4.8 ha. For the most part, it is well contained within the developed framework of the town; the exception to this is that part of the site which projects northward of the settlement limits to the east and west of the site. The site is within walking distance of the town centre, and close to educational and recreational facilities and to public transport routes. There appear to be no constraints to its development; indeed service provision appears to have been made in conjunction with the recent development to the east.

4.5.65 The exclusion of the northern part of the site would reduce the developable area to around 2.6 ha, capable of accommodating some 80 dwellings. Having seen all the other omission sites and looked at the town generally for other potential alternatives, I am of the view that this site is the preferred option for development; I understand the Council to agree on this matter. The allocation of this reduced area would go some way towards meeting the housing needs of the town, including over 25 affordable homes. I recommend accordingly.

4.5.66 **Land at Lowgate.** This greenfield site is isolated from the main body of Long Sutton and its facilities and is sequentially inferior to many of the other omission sites.

4.5.67 **Land at Main Road.** Although this site of a former transport café adjoins existing

housing, it appears different in character from the settlement itself, and remote from the town centre, and I see little justification for its inclusion within the settlement boundary.

- 4.5.68 **Land at Docking's Holt.** This 4.7 ha greenfield site is peripheral to the settlement, poorly related to its built form, and its development would be a prominent intrusion into open countryside. Even were there a need for additional housing, there would be other sequentially preferable sites.
- 4.5.69 **Land to the North of Lutton Garnsgate.** This 9.8 ha greenfield site is also peripheral to the settlement, although it adjoins housing to the north and east and sporadic development to the south. The site is not needed to meet Long Sutton's housing requirement. Furthermore, the highway authority has indicated that Lutton Garnsgate is unsuitable to serve a development of this scale.
- 4.5.70 **Land to the South of Lutton Garnsgate.** This 4.8 ha greenfield site is in 2 ownerships. The easternmost section is significantly better related to the form of the settlement than the remainder, which extends into open countryside and appears very prominent. I attach little weight to the fact that the eastern section is disused and becoming overgrown; this is not a convincing reason for a site allocation. Although there appears to be the possibility of a suitable access to Garnsgate Road, I find no compelling reason for a further housing allocation, having found the Lime Walk site to be the preferred option.
- 4.5.71 **Land at Gedney Road.** This is the site of a large detached house in landscaped grounds. The site is within the settlement boundary and, as previously developed land, is potentially developable under Policy HS5, subject to the constraints of the site, which I understand to include a Tree Preservation Order. Accordingly, there appears to be little purpose in allocating this site for housing.
- 4.5.72 **Land to the South of the Town Centre, between Station Road, Seagate Road and the A17.** This extensive open area of agricultural land contains 3 objection sites. The northernmost, and closest to the town centre, is a greenfield site of 15.4 ha. It is far larger than is needed to meet the housing needs of the town. Whilst it is suggested as suitable for a mixed development of housing and employment use, there is already a substantial employment allocation at nearby Little Sutton and I am not convinced of any need for further employment land. Development here would intrude into a pleasant open area of countryside. Furthermore, it is not clear how a suitable access would be created to serve such a large site.
- 4.5.73 The site closest to Seagate Road extends to some 13.5 ha. It is sequentially less preferable to the above site and, in any event is not needed to meet the town's housing requirement. There appears to be no suitable means of access to serve a site of this size. The third area, close to the junction of Station Road with the A17, is promoted for housing as part of a mix of uses. It has an area of some 3.05 ha. It is accepted as being sequentially inferior to other sites and I see little justification for allocating this rather isolated site in such circumstances.
- 4.5.74 **Land at Seagate Road.** This greenfield site is promoted as being suitable for frontage development. Whilst it is reasonably close to the town centre and other facilities, a ribbon of development here would appear unduly intrusive in the context of the large area of open land to the east. I conclude above that Lime Walk is a preferable site.
- 4.5.75 **Land between Daniel's Gate and Lime Grove.** This is an extensive area of agricultural land which, although abutting the settlement boundary to the east, is somewhat isolated from the centre of Long Sutton. The site is not needed to meet the LSP housing requirement and, in any event, there are other sequentially preferable sites,

notably the Lime Walk site to the south. The development of this site would represent a substantial intrusion into the countryside, contrary to the aims of the Plan.

- 4.5.76 **Land bounded by Lutton Gowts and Monmouth Lane.** This is a substantial area of agricultural land, sited on the periphery of the settlement in a prominent rural location. The site is not needed to meet the housing requirement and, even if it were, there are alternative sites which are sequentially preferable.
- 4.5.77 **Hall Marsh Farm, Little London.** There are 2 objection sites. The first is a large site bounded by Peele School to the north, by housing in Little London/Roman Bank to the west and by open fields to the east and south. It includes buildings near the road frontage which are part of the butterfly farm, a tourist attraction, but it is predominantly greenfield in nature. This is a major site, whose development would not relate well to the form of the settlement and which would form a significant intrusion into open countryside. It is not needed to meet the LSP housing requirement and there are, in any event, sequentially superior sites. Although it is suggested that development could bolster the viability of the butterfly farm, there is no convincing evidence that this is needed; moreover, the extent of the developable area would far exceed what might be regarded as 'enabling development'.
- 4.5.78 The second site is a small gap in the otherwise continuously built up frontage of Little London/ Roman Bank. It was included within the settlement boundary in the FDD Plan but later excluded. Although the settlement boundary is essentially a policy tool to control the location of development, it seems to me to be illogical to exclude this small infill plot, which will only accommodate a small number of dwellings. This is distinctly different from the large number of infill plots in the other rural settlements, where the release of 1 plot could be argued as a precedent for the release of many others in less sustainable settlements, not least because this is an Area Centre. I conclude that the settlement boundary should include this site. It is too small to be considered as a housing allocation.
- 4.5.79 **Sites at Hospital Drive.** These 2 small greenfield frontage sites are in open countryside, well outside the settlement. To allocate housing in such an unsustainable location would be entirely contrary to the Plan's strategy.
- 4.5.80 **Land at Bridge Road, Little Sutton.** Although the objection site lies immediately to the west of the employment allocation in Little Sutton, I deal with it along with the Long Sutton sites because of its proximity to the town. The site is presently agricultural and comprises some 4.3 ha intended for housing and some 2.3 ha intended for start-up employment units. At 30 dph the residential element of the site should be capable of accommodating in excess of 120 dwellings, although the objector accepts that the site area should be reduced to accommodate around the 80 units which he regards as appropriate. In essence, I agree with the objector that Long Sutton should receive a housing allocation; coincidentally, the site which I recommend at Lime Walk is capable of accommodating 80 dwellings, the number suggested by the objector. That would not be a mixed use allocation but the housing would be in a location which is far more accessible to a range of facilities than the objection site. It would contain a substantial affordable element which in my view is best located in a sustainable location within Long Sutton, rather than in the countryside.
- 4.5.81 The need for start-up units is accepted by the Council, although there appears to be no good reason why such units, together with 'follow-on' units, could not be physically accommodated on the adjacent allocated employment site. The greatest problem here appears to be the start up cost of implementing such schemes. Nevertheless, it is hard to see how the objector's intended provision of affordable housing for local employees

would be able to effectively 'pump prime' the employment units, given the need to minimise selling/rental prices in an affordable housing scheme. The need to accommodate transient agricultural workers is already catered for in the Plan at Policy HS14; the Council indicated at the inquiry that this could also apply to workers in the food industry. Any additional need for affordable housing would be capable of being met under the Rural Exceptions Policy HS9, although a site better related to Long Sutton or Sutton Bridge, with access to local facilities, would be preferable. I am unable to support the objection site.

### Area Centre: Sutton Bridge

#### General

4.5.82 The Plan includes a single housing allocation in Sutton Bridge, with the required provision made up of commitments and UCS sites. By way of IC9 and IC35, the existing allocation off Chestnut Terrace would be halved and a similar sized area off Withington Street would be allocated. The aggregate housing provision would be unchanged. As at 1 April 2005, the situation in Sutton Bridge was:

Completed 2001-2005	92
Under construction	57
Sites with planning permission, not started	91*
Urban Capacity Study sites	55
Allocations	30
	-----
	325
	-----

*\*Allowing for the Council's refusal to renew planning permission for 290 dwellings to the north of Granville Terrace/Chestnut Terrace.*

This equates to around 5.3% of the housing in the Urban Area, whilst Sutton Bridge has around 7.8% of the Urban Area population. This is not so great a disparity as to diminish the role and function of Sutton Bridge as an Area Centre. Evidence at the inquiry indicated that brownfield sites were coming forward at an encouraging rate - 54 dwellings were approved between 2004 and January 2006. There is an acknowledged need for affordable housing in Sutton Bridge. However, the affordable housing policy has only been in place for a short period of time and the Council was able to demonstrate that affordable housing is now starting to come forward both via the planning process and via direct Council funding. The low threshold should ensure that most UCS sites make an appropriate contribution to affordable housing.

4.5.83 Given the level of development to date and the rate at which UCS sites are coming forward, I consider there to be no compelling need for further housing allocations in Sutton Bridge at this time.

#### Allocated Sites: Sutton Bridge

4.5.84 **Land at Chestnut Terrace/Withington Street.** The Council has now accepted the validity of the objections to the allocation of the whole of the site to the east of Chestnut Terrace; much of this is required for use by the adjacent primary school. By way of IC9 and IC35, the original allocation for 30 dwellings would be halved in size and access would be provided via Chestnut Terrace; the balance of the site would be newly

allocated as open space. To make up for the loss, an additional site for 15 dwellings would be allocated to the north of Withington Street. Although this site is well related to the form of the settlement, residents have questioned whether access via Withington Street would be acceptable; the road is narrow and there is much on-street parking, giving rise to concerns about safety and congestion. Whilst I recognise the concerns, it appears to me that such problems are capable of being resolved; for example the introduction of a turning head ought to be beneficial to existing road users. Additionally, concerns about water supply and drainage should be capable of being resolved – and would need to be resolved for a planning application to be successful. I support IC9 and IC35

*Omission Sites: Sutton Bridge*

- 4.5.85 **Land at Bridge Road, West of Sutton Bridge.** There are 2 overlapping objection sites extending westward from a diagonal drain, which marks the boundary of an extant planning permission and of the settlement. The larger site extends some 440m westward. The smaller site extends for the first 120m of the larger site, infilling the gap to the sporadic group of development which includes Frankie's Café. The larger site would represent a substantial extension of development into open countryside and would be poorly related to the built form of Sutton Bridge. The smaller site, around 1ha in extent, is far better related to the settlement. Its development would infill an existing gap in the Bridge Road frontage which will be partly filled by the already approved housing development. It appears to be free from constraint, save for concern about conflict with the use of an airstrip to the north. However, in the light of the approval of the adjoining development, it is difficult to envisage this as an overriding concern. Nevertheless, in the light of my conclusion that no further housing allocation is necessary in Sutton Bridge, I share the Council's view that it would be more appropriate to review this site via the LDF, in the event that the housing requirement is increased in the RSS.
- 4.5.86 **Land to the North of the above sites.** This site is promoted as an alternative to the site at Little Sutton, referred to in para.4.5.80 above. However, it is poorly related to the built form of the settlement and its development would represent a substantial and unacceptable intrusion into open countryside. Even were additional housing required, there would be sequentially preferable alternatives.
- 4.5.87 **89 New Road.** The objectors seek to extend the settlement boundary around the large curtilage of this property. However, this would then open up the possibility of inappropriately extending built development into a presently open area. The settlement boundaries have been consistently drawn to exclude such large curtilages, where there is no need for additional housing and I see no reason to make an exception in this case.

**Group Centres: General**

- 4.5.88 Because of the need to address the overall reduced housing requirement set out in the LSP and the history of over-provision of housing in the Rural Area, I am satisfied that the Plan's strategy of restraining housing provision in the Rural Area is appropriate. The table at 4.1.6 of this report indicates there are 83 unimplemented permissions in the Group Centres and I accept that there is no need to allocate housing in the Rural Area; the limited extent of development allowed in the Group Centres by Policy HS6 ought to be adequate to meet the market housing needs, and contribute to the affordable housing needs of those settlements and to reinforce their role within the settlement hierarchy. Policy HS9 directly addresses the question of rural housing need and would allow affordable housing to be provided in appropriate circumstances. In the light of the above, I do not support any objection seeking a housing allocation in any of the Group Centres. I take a similar view of objections seeking an extension of the settlement

boundary purely to enable new housing development; any such development on greenfield land would not, in any event, be permitted by Policy HS6.

**Group Centre: Cowbit**

4.5.89 My general conclusion results in my not supporting the allocation of any of the objection sites. Those within 'the triangle' are clearly in the midst of the settlement. However, it would conflict with the Plan's strategy to allow such extensive greenfield development in a settlement of this type. I reach a similar conclusion on the merits of the horticultural (and therefore greenfield) site to the north of the former railway goods yard. Both objection sites relating to the railway goods yard are within the settlement boundary and, being previously developed land, should quite properly be considered for development under the provisions of Policy HS6.

**Group Centre: Fleet Hargate**

4.5.90 The 3 objection sites, 2 to the South-West and 1 to the North of the settlement, are all greenfield sites beyond the settlement boundary, whose development would be unacceptable in principle in the light of my above conclusion. Moreover, a large part of the Northern site is within the conservation area and the site adjoins the A17 by-pass. I have not seen compelling evidence that the site is suitable for housing, in the light of these considerations.

**Group Centre: Gedney Hill**

4.5.91 The objection site at North Road has been developed and is within the settlement boundary; it is not clear why this objection has not been withdrawn. The other objection sites in this rather scattered village are all greenfield and, even if they were included within the settlement boundary, would not be developable under the terms of Policy HS6. As concluded above, I do not support allocations in the Group Centres.

**Group Centre: Gosberton**

4.5.92 There are 4 substantial objection sites, 2 sites either side of Low Gate, 1 in Belchmire Lane and 1 in Bow Gate. All are greenfield and all are peripheral to the settlement; their development would extend the settlement into open countryside. Moreover, the Low Gate sites are particularly large in relation to the size of the settlement. As stated above, I do not support allocations in the Group Centres.

**Group Centre: Moulton**

4.5.93 Having taken a view not to support the allocation of housing sites in the Group Centres, I see no reason to treat Moulton differently. There is a cluster of objection sites to the South-West of the settlement, 1 site to the North-West, off Shivean Gate and 2 sites off Church Lane. All are predominantly greenfield, all are peripheral to the settlement and all would extend the built form out into the countryside. I regard the settlement boundary as appropriately drawn.

**Group Centre: Moulton Chapel**

4.5.94 Two large sites are promoted, one of which would continue a recently built housing estate. However, both are predominantly greenfield and would extend the settlement into open countryside. In accordance with my general conclusion, I do not support either objection.

**Group Centre: Pinchbeck**

4.5.95 Pinchbeck is unique amongst the Group Centres in its proximity to the Main Town and to a major employment area. As a matter of plain fact, there is no break in the settlement

boundary between Spalding and Pinchbeck, albeit there is a discernible gap of open countryside to the west side of Spalding Road. However, the status of Pinchbeck and its relationship to Spalding are matters to be considered in detail in the forthcoming Spalding Area Action Plan, listed in the Council's Local Development Scheme (CD/SH/01). Therefore, until these matters have been reviewed and any strategic change proposed, I am content that, on the basis of its existing facilities, Pinchbeck is appropriately classed as a Group Centre. As a matter of general principle, I have concluded that the Plan's strategy of not allocating housing in the Group Centres is appropriate and I have seen no convincing reason to treat Pinchbeck as an exception.

- 4.5.96 Having regard to the fact that the prime purpose of the settlement boundary is not to simply reflect the built form of the settlement but to act as a policy tool to control the amount and extent of development, I do not support any alteration of the settlement boundary. In any event, virtually all the objection sites promoted for development are greenfield and would not normally be developable under the terms of Policy HS6, even were they to be included within the settlement boundary.
- 4.5.97 None of the 4 objection sites to the east side of Pinchbeck were within the more extensive settlement boundary defined in either the Adopted Local Plan or the FDD Plan. The sites adjacent to Blue Gowt Bridge and to the east of the parish church are distinctly rural in nature and development here would unacceptably extend the settlement into the countryside. Moreover, both are within or adjoining the Pinchbeck Conservation Area and I have seen no evidence that the impact of development would be acceptable in this context. The sites off Horsepit Lane and fronting Surfleet Road are also greenfield and neither appears to sit comfortably with the present built form of Pinchbeck.
- 4.5.98 The remaining objection sites were all within the settlement boundary in both the Adopted Local Plan and the FDD Plan. The 3 small sites fronting Milestone Lane and Bacon's Lane are gaps in rather dispersed frontage development and I agree with the Council that there is no good reason to retain these open areas within the settlement boundary. Three of the sites, West of Crossgate Lane, North of Captain's Beck and Flaxmill Field, were identified as Major Housing Proposals in the Adopted Local Plan. The first two of these are particularly well integrated within the built form of Pinchbeck and the third is fairly well enclosed by built development and contained by the River Glen. However, they are greenfield sites which are not needed to meet the housing requirement of the area, in accordance with the strategic approach which I have endorsed.
- 4.5.99 The final site, off Market Way, is an active nursery. This site is particularly well screened by boundary vegetation and very well contained within the village structure. Whilst the Northern part of this site is clearly greenfield, there was some dispute at the inquiry as to the status of the southern section, which contains a number of large buildings and extensive hard standing, in addition to the associated dwelling. However, I am not persuaded that this should be regarded as previously developed land. It appears to me to be typical of many of the horticultural units in the District and there is no convincing evidence of a lawful change from horticultural use. Its proximity to other dwellings would not alter my conclusion on this particular issue. This appears to be a developable site, with no undue constraints but, in the light of the current strategy, it is not needed to meet the District's housing requirement.

**Group Centre: Sutton St.James**

- 4.5.100 The objection site at the Eastern end of the village is part of a paddock and its frontage development would extend the settlement into open countryside. It would be
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inappropriate either to extend the settlement boundary or to allocate the site to allow housing.

**Group Centre: Weston**

4.5.101 Virtually all of the extensive, undeveloped, open area between the village and the A151 by-pass has been suggested for housing development. Two smaller sites off Begger's Bush Lane and Small Drove are also promoted. All are greenfield and peripheral to the main body of the existing settlement. In accordance with my earlier conclusion, I do not support the allocation of housing in any of the Group Centres. Nor do I believe it appropriate to amend the settlement limit to include land which would not, in any event, be developable under the terms of Policy HS6.

**Group Centre: Whaplode**

4.5.102 Three sites are promoted for housing, one to the north of the A151 and two to the south of the village. Two are greenfield and beyond the settlement boundary. As per my earlier conclusion, I do not support the allocation of housing in any of the Group Centres. Nor do I believe it appropriate to amend the settlement boundary to include land which would not, in any event, be developable under the terms of Policy HS6.

4.5.103 The site to the rear of Tamarisk in Cob Gate was shown outside the 'development boundary' for Whaplode in the 1998 Adopted Local Plan and remains outside the 'defined settlement limit' in the Plan. However, as most of the rear curtilage of the objectors' property – indeed, part of their house – lies in what is, for Plan purposes, the countryside, I can well understand how this appears to be an anomaly. The more so since in terms of its use, enclosure and relationship to the settlement, the objectors' land is plainly not in the countryside as a matter of fact. The objectors' suggested amendment to the defined settlement limit does thus appear wholly rational in terms of defining the form of the settlement.

4.5.104 Nonetheless, that is not their function. While the defined settlement limits do obviously pay regard to settlement form, their chief purpose in the Group Centres is as a policy tool to provide for the distribution of development. I am satisfied the limits appropriately perform this function and should not be widened at this time. I am not therefore led to recommend any change in this instance. Considering the history of the site, the suggestion that the objectors' business use of the site could be jeopardised by the present settlement limit appears to me to be without foundation.

**Other Rural Settlements: General**

4.5.105 In section 3.1 of this report, I accept the principle of removing settlement boundaries from the Other Rural Settlements. This accords with the RSS and LSP strategy of focusing development in the more sustainable settlements. Therefore, I do not agree with the objections which seek to reinstate settlement boundaries which were defined either in the Adopted Local Plan or in the First Deposit Draft Local Plan to any of the Other Rural Settlements. It follows that I see little merit in objections seeking an extension to such boundaries. I am satisfied that the Plan makes proper provision for local needs, whether for affordable housing or housing necessary for an appropriate rural enterprise, in order to sustain the rural communities and the rural economy. As a consequence, although I have read each objection, together with the Council's response, and have visited each objection site, I do not propose to recommend a housing allocation, of whatever size, in any of the Other Rural Settlements. It is always open to an applicant to put forward material considerations which may justify a decision contrary to the development plan in the case of any proposal for development which would not accord with Policy HS7.

4.5.106 Having reached the above conclusion, I do not intend to comment further on the individual objections or the settlements to which they relate.

## RECOMMENDATION

### R.4.5. I recommend that the Plan be amended:

- i. in accordance with IC9, subject to including the totals for the individual sites in the table to Policy HS3;
- ii. in accordance with IC31, IC32, IC33 and IC35;
- iii. by amending the settlement boundary for Donington to include the land between Flinders Park and Maple Way within the settlement boundary;
- iv. by amending the defined settlement limit for Long Sutton to include the whole of the road frontage adjacent to Hall Marsh farm, Little London; and
- v. by allocating for housing some 2.6 ha of land (c.80 dwellings) at Lime Walk, Long Sutton.

## 4.6 HS4 – NEW HOUSING IN SPALDING (NON-ALLOCATED SITES)

### Objections

See Appendix A10

### Issues

- a. Whether an additional environmental objective should be included in the Plan.
- b. Whether or not the plan has allocated sufficient land to meet Structure Plan targets.
- c. Whether or not the plan will achieve a sustainable distribution of housing and also a level of house building sufficient to meet local needs in the main settlements and villages.
- d. Whether or not policies HS4, HS5 and HS6 should allow brownfield development in, or adjacent to all settlements.
- e. Whether the plan places too much reliance on windfall sites and whether the plan should contain 3 separate windfall policies.
- f. Whether policy HS4 needs amending with additional criteria added to include reference to planning obligations and environmental criteria.

*Site-Specific Objections: these are dealt with under Policy HS3 above.*

### Inspector's Reasoning and Conclusions

- 4.6.1 **Issues a – c.** These issues are dealt with in Chapter 2 and sections 3.1 and 4.1 of this report.
- 4.6.2 **Issue d.** The Plan quite properly allows for appropriate brownfield development in the Main Town, Area Centres and Group Centres. However, the development of brownfield sites in smaller settlements and in the countryside is unlikely to be more sustainable than development in the larger settlements; having regard to the Plan's underlying strategy, it is unlikely to be a preferable option. Therefore, I resist the inclusion of a single policy and a general presumption in favour of brownfield development in all locations. It is always open to an applicant to raise material considerations in favour of development of

an individual site in the smaller villages and the countryside.

- 4.6.3 **Issue e.** In section 4.1 above, I conclude that the Plan is not over-reliant on windfall sites. The UCS has proved a robust method of identifying and delivering such sites in sustainable locations. Because of the rural nature of the District, the contribution from brownfield sites is necessarily limited and some greenfield development is essential to meet the housing requirement, in terms of both allocations and windfalls. However, I agree with the objectors that national and strategic guidance to follow the sequential approach requires an initial focus on brownfield sites. The Council appears to have accepted this in the Area Centres in proposing changes to Policy HS5 by way of PIC33 and IC10 and I can see no reason for Spalding to be treated any differently. Whilst I understand the Council's wish to reflect the settlement hierarchy, if the sequential approach is introduced into Policy HS4, there would be no discernible difference between HS4 and HS5 and therefore no reason to have 2 separate policies. I shall recommend accordingly. On this basis, the criticism of the difference in approach between paras.4.33 and 4.35 is also justified; both the Main Town and the Area Centres are sustainable locations for development.
- 4.6.4 **Issue f.** Policy HS4 is designed to deal with the principle of development within Spalding. There are other policies in the Plan which satisfactorily address other relevant issues, including the matters of planning gain and of impact on the environment. In respect of my proposed merger of the policies, other policies in the Plan would require development to be acceptable in scale and character with its surroundings and there is no reason for this criterion to apply solely to Spalding.

## RECOMMENDATION

### R.4.6. I recommend that the Plan be amended:

- i. **by replacing Policies HS4 and HS5 with:**  
**“Residential development will be permitted on suitable sites within Spalding and the Area Centres, where the following criteria are satisfied:**
  - 1) **The site is within the defined settlement limits, as shown on the proposals map; and**
  - 2) **The site constitutes brownfield land, unless it can be demonstrated that no suitable brownfield sites are genuinely available.”; and**
- ii. **by merging the reasoned justification, set out in paras.4.33 – 4.35, as amended by IC10.**

## 4.7 HS5 - NEW HOUSING IN THE AREA CENTRES (OTHER TOWNS AND DONINGTON) (NON-ALLOCATED SITES)

### Objections

See Appendix A11

### Issues

- a. Whether or not the plan will achieve a sustainable distribution of housing and also a level of housebuilding sufficient to meet local needs in the main settlements and villages.
  - b. Whether or not the plan has allocated sufficient land to meet Structure Plan targets.
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- c. Whether the methodology used in the Urban Capacity Study is appropriate.
- d. Whether Policy HS5 is unduly restrictive and should be amended to make provision for surplus greenfield sites.
- e. Whether policy HS5 needs amending with additional criteria added.

*Site-Specific Objections: these are dealt with under Policy HS3 above.*

### **Inspector's Reasoning and Conclusions**

- 4.7.1 **Issues a-c.** These matters are dealt with in sections 3.1 and 4.1 above.
- 4.7.2 **Issue d.** The policy, as proposed to be amended by PIC33 and again by IC10, would properly reflect the sequential test by giving priority to brownfield land before greenfield; this would accord with national and strategic policy. This should not be unduly restrictive, as IC10 addresses the objectors' valid concern that owners refusing to release brownfield sites could stymie the release of greenfield sites. I have taken both of these considerations into account in the re-wording of the replacement policy, recommended at 4.6 above.
- 4.7.3 **Issue e.** Objectors have suggested a number of additional criteria, including the need for monitoring and management in the event of an over-supply and the need to control density and design. However, Policy HS2 suitably addresses the first point and other policies, such as HS10, would address the other matters. As the Plan is to be read as a whole, additional criteria are unnecessary.

### **RECOMMENDATION**

**R.4.7. See R.4.6.**

## **4.8 HS6 – NEW HOUSING IN THE GROUP CENTRES (NON-ALLOCATED SITES)**

### **Objections**

See Appendix A12

### **Issues**

- a. Whether or not the plan will achieve a sustainable distribution of housing and also a level of housebuilding sufficient to meet local needs in the main settlements and villages.
- b. Whether the defined settlement limits should be redrawn as in the First Deposit Plan.
- c. Whether the plan should contain 3 separate windfall policies.
- d. Whether the plan places too much reliance on windfall sites.
- e. Whether policy HS6 needs amending by adding further criteria.

*Site-Specific Objections: these are dealt with under Policy HS3 above.*

### **Inspector's Reasoning and Conclusions**

- 4.8.1 **Issues a – b.** See sections 3.1 and 4.1 of this report. I do not support any variation in the Plan's settlement hierarchy, which seems quite properly based on an assessment of the facilities and services found in each settlement. In addition to brownfield development, affordable housing to meet the community's needs would be allowable under Policy HS9. However, the generally dispersed and low density nature of the settlements in this

category is such that, to allow greenfield infill development, would be likely to give rise to a significant over-provision of housing in the Rural Area, contrary to the Plan's housing strategy.

- 4.8.2 In many cases, objectors have suggested amendments to the defined settlement boundaries that appear entirely logical in terms of defining the form of the settlement. However, that is not their purpose. Rather, settlement boundaries are intended to be a policy tool to restrain development, in line with the housing strategy, and to help maintain the character of rural settlements by retaining a gentle transition from the built areas to the countryside. I am satisfied that they appropriately perform this function and should not be widened back to their extent in the First Deposit Draft Plan.
- 4.8.3 The criticism that replacement dwellings are not allowable appears misplaced, as criterion 3 would permit this.
- 4.8.4 A valid point is made that the monitoring and management process might be too crude to allow the needs of individual settlements or parts of the Rural Area to be taken into account. The concern is that, because the whole of the Rural Area is treated as one, a high level of development in some parts of the Rural Area could 'use up' the whole of the housing requirement and leave settlements in other parts of the Area with no development potential. This is a matter that I have recommended is addressed under Policy HS2.
- 4.8.5 **Issues c – d.** See section 4.6.3 above.
- 4.8.6 **Issue e.** The addition of criteria such as density and design are unnecessary. These matters are covered elsewhere in the Plan, which should be read as a whole. This principle would apply equally to criterion 4 and to criterion 5 (which IC67 would remove anyway). I recommend the deletion of both of these criteria.

## RECOMMENDATION

**R.4.8. I recommend that the Plan be amended by the deletion of criteria 4 & 5 from Policy HS6.**

## 4.9 HS7 - NEW HOUSING IN THE OPEN COUNTRYSIDE, INCLUDING THE OTHER RURAL SETTLEMENTS

### Objections

See Appendix A13

### Issues

- a. Whether or not the housing strategy is appropriate to deliver a sustainable distribution of housing to meet needs in the main settlements and villages.
- b. Whether it is appropriate to restrict development in the Other Rural Settlements by removal of defined settlement limits.
- c. Whether reference to the open countryside should be deleted.
- d. Whether the Policy should be amended to include criteria on where dwellings will be allowed in rural settlements or groups of buildings.

- e. Whether infill or brownfield development should be allowed in the Other Rural Settlements.

*Site-Specific Objections: these are dealt with under Policy HS3 above.*

### **Inspector's Reasoning and Conclusions**

- 4.9.1 **Issues a – b.** I appreciate that many rural settlements once had settlement boundaries, in some cases quite widely drawn, within which residential development would formerly have been allowed. Many objectors are clearly frustrated at having ‘missed the boat’. However, the Council has had to respond to the major change in the housing strategy set out in the RSS and the LSP and to take account of the relative over-provision of housing in the Rural Area, compared to the Urban Area. During my site visits, I have seen many objection sites which would appear to be readily developable, without undue harm to the village form, but which would nonetheless conflict with the housing strategy. This is similar to the case in the 2002 appeal decision, submitted by an objector, made in respect of a site at Coalbeach Lane, Surfleet (ref: APP/A2525/A/01/1078392). There, the Inspector found the site to be contained within the village fabric and capable of being developed satisfactorily, save for the conflict with the housing strategy, which was at that time at much more of a formative stage than at present; the appeal was dismissed. As in sections 3.1 and 4.2 of this report, I accept that the housing strategy is appropriate and resist the re-introduction of settlement boundaries to Other Rural Settlements.
- 4.9.2 **Issues c - e.** Policy HS7 appears inconsistent with both Policy SG3 and with PPS7 in treating all the remaining settlements as part of the countryside. Other Rural Settlements are defined in para.3.22 and on the Proposals Map and clearly occupy a tier in the settlement hierarchy above any remaining settlements not so identified. I see no objection to treating these unidentified remaining settlements, most of which have few, if any, community facilities, as part of the open countryside in policy terms. They would be subject to Policy HS12.
- 4.9.3 However, for the Other Rural Settlements to have any purpose, there must be the opportunity of some development, to help sustain the community. Policy HS9 would allow affordable housing as an exception to normal policy and would direct it to the more sustainable rural settlements. Clearly this policy is capable of applying to Other Rural Settlements and I see the need to amend the reasoned justification to Policy HS9 to give greater weight to the settlement hierarchy, set out in Policy SG3, and to ensure housing is directed to Other Rural Settlements before other, less sustainable locations. On this basis, I am content that Policy HS7, as amended by IC68, is acceptable.
- 4.9.4 In addition to this, Policy HS17 would allow replacement dwellings and Policy HS16 would allow the conversion of appropriate existing buildings, which contribute to the character of the village, to dwellings. The former would improve, but would not increase, the housing stock and the latter is likely to produce modest only numbers of dwellings.
- 4.9.5 I resist the notion of including infill development, whether on brownfield or greenfield land. Even if this were limited to single plots, the nature of all the settlements I visited appears to be such as to generate the opportunity of significant numbers of infill dwellings which, in total, would be strategically significant.
- 4.9.6 There appears to be no need for additional criteria, such as ensuring development would be in character with the settlement, or having regard to the overall impact on housing provision as these matters are covered elsewhere in the Plan, which must be read as a whole.

4.9.7 **Site-Specific Objections.** Although I have read all the objections and visited all the objection sites, I have considered the objections globally in the light of my conclusions earlier in this report. It is not consistent with the housing strategy of the RSS and the LSP to allocate housing sites in Other Rural Settlements because of their lack of facilities relative to the settlements higher in the hierarchy.

## RECOMMENDATION

**R.4.9. I recommend that the Plan be amended in accordance with IC68.**

### 4.10 HSS - AFFORDABLE HOUSING

#### Objections

See Appendix A14

#### Issues

- a. The definition of affordable housing.
- b. The need for affordable housing. .
- c. Whether the housing strategy will meet the need for affordable housing.
- d. Appropriate threshold levels.
- e. Whether the affordable housing policy should be prescriptive.
- f. Whether affordable homes should be distributed throughout a development.
- g. Whether there is a particular need for affordable housing in Pinchbeck.
- h. Whether Donington should be treated differently from other settlements.
- i. Whether the demand for affordable housing in Crowland to match job opportunities on allocated employment land in Crowland will be met.

#### Inspector's Reasoning and Conclusions

4.10.1 **Issue a.** Affordable housing is defined in para.4.42 of the Plan and this is amplified in para.4.47. This would not include low cost market housing, unless it was made available at a price below the normal market level. The role of low cost market housing is acknowledged to contribute to mixed communities, but is seen as being beyond the means of those whose needs the Council's Housing Needs Survey (CD/SH/14) seeks to meet. It is not therefore considered to form part of the annual requirement for 269 additional affordable homes, identified by the Council. This definition appears consistent with that of Draft PPS3 and is supported.

4.10.2 **Issues b - d.** The need for affordable housing and the strategy for its provision are dealt with in section 4.1 of this report. There I conclude that the Plan's strategy is adequate at present as there is evidence that affordable housing is beginning to come forward from a variety of sources. I also conclude that the threshold in the Plan, (as proposed to be amended in IC11) of 3 dwellings, is appropriate. That is intended to reflect both the exceptional need for affordable housing and the particular characteristics of this rural District, where much of the development will be small in scale and must address the needs of widely scattered settlements. It also reflects the fact that a substantial part of the housing provision would derive from windfall sites of greatly varying sizes.

- 4.10.3 There is clearly a need to ensure that affordable housing is provided in the right location to meet the identified need. I have recommended an amendment to para.4.19 which should ensure that the affordable housing needs of the whole of the Rural Area are monitored.
- 4.10.4 **Issue e.** The wording of the Policy, as proposed to be amended by IC11, is prescriptive. This is stronger than advised in Circular 6/98 and PPG3 but to my mind justified for 2 reasons. First, the need in the District is such that the problem *must* be addressed. The impression should not be given that the provision is optional and, indeed, PPG3 goes on to state that, where there is an identified need, there is a 'presumption' that such housing should be provided. Second, the policy would, by dint of IC69, explicitly include a rider on viability. Hence, any scheme incurring exceptional costs, whether due to site-specific difficulties or the need for contributions to other infrastructure measures, may submit evidence to argue for a lower than one third provision. This I see as essential, as it would be in no-one's interest if the requirement to provide affordable housing inhibited sites coming forward for development.
- 4.10.5 Policy HS8 is supported by up to date Supplementary Planning Guidance (SPG) on Affordable Housing (CD/SH/25) which has been the subject of consultation and public participation. The SPG adds greater detail on the mechanism for such provision than is appropriate in the Plan and, importantly, sets out the process of 'cascading' the disposal of affordable dwellings in the event that qualifying occupants are not forthcoming. I am content with this approach, which provides an appropriate degree of flexibility to the process.
- 4.10.6 **Issues g – i.** I have commented on the need for affordable housing in general in section 4.1 of this report and, where necessary, under each of the larger settlements in section 4.5 of this report. I am satisfied that the issue is being properly addressed in the Plan and by other means of providing affordable housing.

## RECOMMENDATION

**R.4.10. I recommend that the Plan be amended in accordance with IC11 and IC69.**

### 4.11 HS9 – RURAL EXCEPTIONS

#### Objections

120/001	F	Mountains Road Haulage Ltd
139/010	F	Countryside Agency East Midlands Region
308/014	F	Country Land and Business Association
574/014	R	Councillor Chris Brewis
582/003	R	Mr and Mrs J R Blencowe
638/PIC37	P	Allison Homes Eastern Ltd
654/014	R	Councillor P M Walls
670/003	R	Moulton Parish Council

#### Issues

- Whether the policy adequately defines 'local' and 'need'.
- Whether the policy addresses the location, size and sustainability of the proposed exception site.

- c. The role of parish plans and village appraisals in identifying rural housing needs.
- d. Whether the site at Lutton Gowts is acceptable under this policy.

### **Inspector's Reasoning and Conclusions**

- 4.11.1 **Issue a.** When the policy is read in conjunction with the SPG on Affordable Housing, which I endorse above, both terms are clearly defined.
- 4.11.2 **Issues b & c.** The reasoned justification, as amended by PIC37, would make it clear that the size of any exception site should be commensurate with that of the settlement, normally with a maximum of 10 dwellings. This would not exclude a larger site coming forward, if justified, albeit regard would then need to be paid to the mixture of the community. The lack of settlement boundaries in the smaller settlements should not result in development in inappropriate locations; a judgement still needs to be made as to the suitability of the site under criterion 3. PIC37 refers to the importance of parish plans and village appraisals to help identify need in particular locations. This should enable the need to be met as locally as possible, commensurate with the underlying principle of sustainability. In section 4.9 above, I refer to the need to strengthen reference to the settlement hierarchy and to give preference to Other Rural Settlements over less sustainable locations.
- 4.11.3 **Issue d.** This policy is criteria based and is not designed to allocate specific sites. Nevertheless, the objector's 1.4 ha site at Lutton Gowts is far larger than envisaged by this policy and I have seen no compelling evidence of local need to justify its development in what appears to be an unsustainable location.

### **RECOMMENDATION**

#### **R.4.11. I recommend that the Plan be amended:**

- i. **in accordance with PIC37;**
- ii. **by changing the 6<sup>th</sup> sentence of para.4.56 to "Particular regard will be had to the settlement hierarchy set out in Policy SG3.;" and**
- iii. **by changing the 3<sup>rd</sup> sentence of para.4.57 to "The Council will also consider granting proposals which are well related to the built up area of one of the Other Rural Settlements, where there are some services and facilities present in the village and where the housing is essential to meet local need; only very exceptionally will proposals be allowed in other, less sustainable, locations."**

## **4.12 HS10 – DESIGN AND LAYOUT OF NEW RESIDENTIAL DEVELOPMENT**

### **Objections**

- 532/023 R Fiona Forgham, Government Office for the East Midlands
- 640/002 R Pedals
- 655/017 R Broadgate Homes Ltd

### **Issues**

- a. Whether the Policy is already covered by Policies SG14 and SG18.
- b. Whether Policy HS10 is written as an objective.

- c. Whether the policy is too prescriptive and does not deal with good modern design.

### **Inspector's Reasoning and Conclusions**

- 4.12.1 **Issues a – b.** Policies SG14, SG18 and SG19 already cover all matters included in this policy, albeit phrased to deal with 'development' rather than 'residential development'. As the Plan is to be read as a whole, I agree that this policy and its reasoned justification are unnecessary in principle. Much of the policy is, in any event, expressed as an objective and the addition of 'normally' to the wording only reduces its clarity.
- 4.12.2 **Issue c.** Reference to high quality contemporary design would be introduced by way of PIC38, which I should have supported had it not already formed part of Policy SG14.

### **RECOMMENDATION**

**R.4.12. I recommend the Plan be amended by the deletion of Policy HS10 and its reasoned justification.**

## **4.13 HS11 – OPEN SPACE IN NEW RESIDENTIAL DEVELOPMENTS**

### **Objections**

143/011	F	Sport England
144/028	F	Councillor P M Walls
149/004	F	BT
257/015	F	Abbey Developments
541/002	R	Matrix Planning Ltd
576/011	R	Lincolnshire Wildlife Trust
683/022	R	Spalding & District Civic Society
686/015	R	HBF

### **Issues**

- a. Whether the policy should adopt a blanket approach to all areas, irrespective of existing facilities and whether the 14% requirement is justified.
- b. Whether there should be a threshold for open space provision.
- c. Whether the policy should be clarified to specifically exclude landscape buffers and roadside verges from the open space provision.
- d. Whether the policy should make reference to the need for new playing fields to be provided in appropriate locations.
- e. Whether the second paragraph of the policy needs to be clearer and more precise.
- f. Whether it is appropriate to seek maintenance payments.
- g. Whether the policy should recognise wild green areas.

### **Inspector's Reasoning and Conclusions**

- 4.13.1 **Issue a.** The Council has carried out an assessment of open space provision (CD/SH/16) which indicates a shortage of open space in Spalding, Holbeach and Sutton Bridge but not in the remaining Area Centres. On the face of it, it would appear illogical to apply the same open space requirements in these different circumstances. However, Policy HS11 quite correctly addresses the need for open space arising from the development

itself. Such a need can still arise in a settlement where there is a general surplus, when the different types of open space and the different accessibility requirements are taken into account. To my mind, the second paragraph of the policy is written in a suitably flexible manner to take such considerations into account. As proposed to be amended by IC70, it refers to situations “... *where the development is adjacent to or in close proximity to a sufficient sized area of existing open space ...*”. In such cases, financial contributions may be accepted “... *if required to meet the needs arising from the development.*” This clearly allows site-specific considerations to be taken into account.

- 4.13.2 The derivation of the 14% figure from the National Playing Fields Standard (2.43 ha of open space per 1000 population) is explained in the Council’s statement. It assumes a density of 25 dph. In accordance with the advice of PPG3, density should normally be higher than this and therefore the term *not less than* 14% appears to take this into account. PPG17: *Planning for Open Space, Sport and Recreation* provides for local standards to be adopted, following an assessment of need, although I see no reason here to depart greatly from the above Standard.
- 4.13.3 **Issue b.** Para.4.63 of the reasoned justification refers to a threshold of 15 dwellings, below which it is unlikely that open space would be provided on site but a contribution required to provide nearby facilities. There is no threshold below which contributions would not be required at all; as written, the policy would apply to all developments, including single dwellings. However, the Council’s written response to Matrix Planning, Abbey Developments and BT states ‘.. *it is unlikely that a contribution to open space would be sought on a single plot, as the impact on open space provision would be small, as would any contribution. The objector correctly identifies that the seeking of provision on all single plots would also slow down the decision making process on planning applications.*’ It is a matter for the Council as to how the policy is implemented. However, local need for open space appears to me of greater importance than avoiding administrative inconvenience. Although individual contributions may be small, they can be pooled to achieve a sum which may be significant in areas of open space shortage and I see no compelling reason to introduce a threshold into the policy.
- 4.13.4 **Issue c.** As suitably amended by IC13, the reasoned justification makes it clear that neither landscape buffer strips nor roadside verges contribute to open space under this policy, there is no need for this point to be repeated in the policy itself.
- 4.13.5 **Issue d.** Provision is made in the Plan for urban extensions in Spalding and Holbeach, which are intended to include open space and community facilities. Playing fields should, if needed, form part of the development brief in each case. I agree with the Council that the other allocations or urban capacity sites are unlikely to be of sufficient size to warrant playing field provision and therefore there is no need for an explicit reference to playing fields.
- 4.13.6 **Issue e.** The Council accepts that the wording is not clear. IC70 would rectify this and convey the intended meaning.
- 4.13.7 **Issue f.** Circular 5/2005 distinguishes between facilities which are predominantly for the benefit of the users of the associated development and those intended for wider public use, which would usually be adopted by the Council. The requirement for maintenance payments may be appropriate for the former, but generally not for the latter. However, the last paragraph of the policy appears to me to make this distinction, allowing for either course of action; the addition of the word ‘either’ would reinforce this distinction. It would not be appropriate to include in a policy the detailed procedures required for maintenance payments or adoption; that would be better set out in a Supplementary Planning Document which would, in any event, need to be consistent with the guidance

of the Circular. PIC39 would add a suitable reference to this.

4.13.8 **Issue g.** The policy is not intended to address wild green space, which does not fall within the definition of play space. Other policies within the Plan, notably SH18 and EN2, should provide an adequate context for the protection/enhancement of such areas.

#### RECOMMENDATION

**R.4.13. I recommend that the Plan be amended:**

- i. in accordance with PIC39, IC13 and IC70; and**
- ii. by the addition of 'either' after the word 'secured' in the final paragraph of the policy.**

#### 4.14 HS12 - AGRICULTURAL WORKERS DWELLINGS

##### Objections

139/008	F	Countryside Agency East Midlands Region
144/009	F	Councillor P M Walls
148/001	F	Crown Estate Commissioners
308/003	F	Country Land and Business Association
311/003	F	Pinchbeck Parish Council
532/024	R	Fiona Forgham, Government Office for the East Midlands

##### Issues

- a. Whether FDD Policy H4 is appropriate and should include the functional and economic tests.
- b. Whether the Policy should be amended in line with PPS7.

##### Inspector's Reasoning and Conclusions

4.14.1 **Issues a - b.** FDD Policy H4 has been completely re-written as HS12 and now includes reference to the functional and financial tests. The objection seeking reference to infill plots in villages does not appear relevant to this policy, which is concerned with the relationship to a place of work. Changes made by PIC40 would add reference to agricultural, *forestry and other* workers in the policy. This should ensure consistency with PPS7 and should allay any fears that it may not be consistent with farm diversification. There is a need to impose an agricultural (or similar) occupancy condition because dwellings are being allowed in locations where they would normally be refused. Whether it is appropriate to retain such conditions on existing dwellings is a matter of individual circumstances.

#### RECOMMENDATION

**R.4.14. I recommend that the Plan be amended in accordance with PIC40**

#### 4.15 HS13 - TEMPORARY AGRICULTURAL WORKERS ACCOMMODATION

##### Objections

574/015 

R
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 Councillor Chris Brewis

**Issues**

- a. Whether the policy needs amending to include reference to submission of a register to local planning authority.

**Inspector's Reasoning and Conclusions**

4.15.1 **Issue a.** It appears that monitoring of such accommodation is carried out by the Council's Enforcement and Environmental Health teams. However, although the policy would require an operator to keep a register, it would not require him to make it available, which appears essential if the occupancy is to be properly monitored. I recommend appropriate wording.

**RECOMMENDATION**

**R.4.15. I recommend that the Plan be amended by the addition to the final sentence of Policy HS13 of “.. and to make this register immediately available, on request, to the local planning authority.”**

**4.16 HS14 – ACCOMMODATION FOR TRANSIENT AGRICULTURAL WORKERS**

**Objections**

574/016 

R
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 Councillor Chris Brewis  
670/005 

R
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 Moulton Parish Council

**Issues**

- a. Whether the policy needs amending to include reference to submission of a register to the Local Planning Authority.
- b. Whether permission should always only be granted on a temporary basis.

**Inspector's Reasoning and Conclusions**

4.16.1 **Issue a.** There appears to be just as much need for accommodation of this type to be monitored as that permitted under Policy HS13. Therefore, I agree with the objector that a similar clause should be added.

4.16.2 **Issue b.** I agree with PIC41, which would suitably meet this objection, as the need for such accommodation is likely to vary over time.

**RECOMMENDATION**

**R.4.16. I recommend that the Plan be amended:**

- i. **in accordance with PIC41; and**
- ii. **by adding to Policy HS14 “Operators will be required to keep a register of all workers living in the accommodation and to make this register immediately available, on request, to the local planning authority.”**

## 4.17 HS15 - AGRICULTURAL OCCUPANCY CLAUSES

### Objections

617/002  R J J Allen Esq

### Issues

- a. Whether the policy needs to be amended to reflect the changes within agriculture within the South Holland area.

### Inspector's Reasoning and Conclusions

4.17.1 **Issue a.** The objector wishes to see the policy extended to include a person employed in the wider agricultural industry. However, the policy is consistent with the advice of PPS7 and reflects the close scrutiny which must occur before exceptions to normal housing policies are permitted. The functional need for such dwellings is paramount and to widen the definition to industries related to agriculture would not generally be consistent with this test. However, in individual cases, it is always open to an applicant to seek to demonstrate an exceptional functional need. Accordingly, the policy should not be amended.

### RECOMMENDATION

**R.4.17. I recommend no amendment to the Plan.**

## 4.18 HS16 - CONVERSION OF REDUNDANT RURAL BUILDINGS TO RESIDENTIAL USE

### Objections

096/004 F Councillor Chris Brewis  
308/004 F Country Land and Business Association  
524/005 R Tom Bray  
683/024 R Spalding & District Civic Society  
683/025 R Spalding & District Civic Society  
687/006 R Wash Estuary Management Group

### Issues

- a. Whether the policy suitably addresses the issue of sustainability.
- b. Whether the policy needs amending to include an extra criterion regarding bats.

### Inspector's Reasoning and Conclusions

4.18.1 **Issue a.** The policy recognises that residential use in unsustainable locations may be inappropriate and quite properly requires employment use to be the first priority. The text makes it clear that this restriction does not apply to buildings clearly unsuitable for employment use or where there is no demand for such. The policy would apply equally to all redundant rural buildings, including chapels, with a clear encouragement to preserve those buildings of importance to the area's heritage.

4.18.2 **Issue b.** There is no need to add a further criterion to protect those species which already enjoy statutory protection. This would, in any event, be a material consideration in determining a planning application.

#### **RECOMMENDATION**

**R.4.18. I recommend no amendment to the Plan.**

### **4.19 HS17 - REPLACEMENT DWELLINGS IN THE COUNTRYSIDE**

#### **Objections**

144/010  F Councillor P M Walls  
216/004  F Mr Robert Congreve

#### **Issues**

- a. Whether FDD Policy H6 should be amended to prevent unduly large replacement dwellings and to require them to be located on the site and footprint of the original dwelling.

#### **Inspector's Reasoning and Conclusions**

4.19.1 **Issue a.** Policy HS17 has been considerably changed from the former Policy H6 and now contains criteria which would appear to meet the objections.

#### **RECOMMENDATION**

**R.4.19. I recommend no amendment to the Plan.**

### **4.20 HS18 - CHANGE OF USE OF PROPERTY TO HOUSING IN MULTIPLE OCCUPATION (HMO) USE**

#### **Objections**

574/017  R Councillor Chris Brewis  
575/002  R Sutton Bridge Town Council  
682/012  R John Hayes MP  
683/026  R Spalding & District Civic Society

#### **Issues**

- a. Whether the policy needs amending to cover the health, safety and other issues identified.  
b. Whether a new policy for dealing with housing in multiple occupation should be included.

#### **Inspector's Reasoning and Conclusions**

4.20.1 **Issues a & b.** A number of matters have been raised by objectors concerning registration, health and safety and local taxation which are matters for the Council's Building Control, Housing and Environmental Health teams, the Fire Service or for the Government to address. I see no place in a planning policy document for a policy to deal

with such matters. The Council, as local planning authority has powers to enforce against unauthorised HMOs, where expedient to so do. It also has the power to impose planning conditions to restrict the number of occupants and to control the siting of refuse, where necessary. I do not see any need for the policy to be amended to permit such action.

## RECOMMENDATION

**R.4.20. I recommend no amendment to the Plan.**

### 4.21 SITES FOR GYPSIES AND TRAVELLERS

#### Objections

512/001	R	Jane Dicken
516/001	R	Emery Planning Partnership Ltd
526/001	R	Community Law Partnership
532/025	R	Fiona Forgham, Government Office for the East Midlands
595/001	R	Peterborough City Council
654/016	R	Councillor P M Walls
669/003	R	Councillor Espin
682/013	R	John Hayes MP

#### Issues

- a. The allocation of gypsy sites or, at least, the inclusion of a criteria based policy.
- b. The inclusion of a clear policy statement on how to accommodate the needs of gypsies and travellers.
- c. The inclusion of a policy for sites for gypsies and travellers.
- d. The extent to which there has been a historic need for gypsy and traveller accommodation in South Holland and how the Council has responded to that.
- e. The progress made by the Council in assessing need for accommodation and in identifying a site or sites which would meet that need.
- f. Whether the Council is justified in dealing with the questions of site selection, formulation of a criteria-based policy and public consultation in parallel with the Local Plan process.
- g. The allocation of land at Cranmore Lane, Holbeach as a gypsy/traveller caravan site.
- h. Whether a new policy should be sought aimed at controlling the behaviour of travellers and their on site activities.

#### Inspector's Reasoning and Conclusions

4.21.1 **Issues a-g.** The Council has sought to address the thrust of the related objections by proposing IC14, which would introduce a new Policy HS19 for sites for gypsies and travellers. An earlier change to para.4.95 was also advanced by PIC44, but would now be largely out of date. However, since the introduction of IC14, Circular 1/94: *Gypsy Sites and Planning* has been replaced by Circular 1/06: *Planning for Gypsy and Traveller Caravan Sites*, issued in February 2006.

- 4.21.2 The new Circular introduces significant changes in policy designed to operate in the new development plan system. These relate to the identification and provision of sites through the development plan process, to meet needs assessed through gypsy and traveller accommodation assessments (GTAAAs). Regional Planning Boards will then consider the GTAAAs, with pitch numbers for individual local planning authorities being specified in the RSS. The number of pitches set out in the RSS must be translated into specific site allocations in one of a local planning authority's Development Plan Documents (DPDs) that form part of the LDF.
- 4.21.3 The issue of site identification will therefore be addressed in the new planning system. In advance of the completion of a GTAA, and the process of consultation and site investigation that would follow, it is simply not feasible for me to identify any individual site as suitable in this development plan. In the intervening period, however, a criteria based policy approach seems an appropriate basis upon which to assess any proposals which may come forward by way of planning application.
- 4.21.4 The proposed introduction of Policy HS19 has generated a number of further representations. I have therefore considered IC14 in light of those comments and the guidance in Circular 1/06. Some of the concerns which have been expressed turn on the way in which the policy would apply in individual cases in the future. Others have raised questions relating to detailed site layout matters or issues outside the scope of my consideration in connection with this report. A number of queries are addressed by the new Circular. For example, para.58 advises that local planning authorities should be able to release sites for development sequentially, with sites identified in DPDs being used before windfall sites. Windfall sites are those which have not been specifically identified as available in DPDs.
- 4.21.5 Turning to the reasoned justification, paras.4.95 – 4.98 need to be revised to reflect the fact that Circular 1/94 has been cancelled by Circular 1/06 and to explain briefly the new approach to provision for gypsies and travellers. As this is a factual update I leave it to the Council to draft. The Council may also wish to update the plan to reflect the position it has reached on the needs assessment it has been undertaking. Again, I leave that to the Council.
- 4.21.6 With regard to specific criticisms levelled at the supporting text, Circular 1/06 makes quite plain that "Rural settings, where not subject to special planning constraints, are acceptable in principle." I agree it would not therefore be appropriate to retain the last sentence of para.4.95 and the last part of the final sentence in para.4.96 since both would in my view be at odds with latest circular advice.
- 4.21.7 There has been criticism of the phrase '...and weighted against the other policies of the Plan'. Whilst this phrase is not incorrect, it is an entirely unnecessary (and incomplete) exposition of the duty under Section 38(6) of the Planning and Compulsory Purchase Act 2004 and should be deleted. The reference to Local Plan in the penultimate sentence of para.4.97 should be deleted. It seems to me different considerations would apply to transit sites or temporary stopping places and I have no objection to para.4.98 as written.
- 4.21.8 Turning to the policy, I propose a change to the opening sentence to strike a more positive note, adopting para.2 to Annex C to Circular 1/06 as a model. I consider criterion 1 places an unreasonable requirement upon an applicant. The data that might be required, and the type of information mentioned in Circular 1/06 at para.44, is more readily available to the Council. Moreover, para.44 of Circular 1/06 states that, 'Local planning authorities will be expected to demonstrate that *they* (my emphasis) have considered this information, where relevant, before any decision to refuse a planning

application for a gypsy and traveller site, and to provide it as part of any appeal documentation.’ That is not, of course, to say I believe need for sites is not a relevant factor, but that in a process where the policy will be dealing with unmet need (and likely only for a relatively short period in advance of the DPD), the onus should not be on the applicant.

- 4.21.9 Criterion 2 may call for an exercise of judgement, but I see no reason why this should present any great difficulty. Its wording is acceptable in my view. With regard to criterion 3, it would not be appropriate or, indeed, realistic to specify a minimum distance between residential property and a proposed site as a matter of policy. This is a factor that would need to be judged upon the individual circumstances and merits of the specific case. The meaning and operation of criterion 4 has been questioned by some. Its principal aim appears to me to safeguard visual amenity. It is similar to LSP Policy H7 in this respect, although I consider the wording more reasonable in light of Circular advice that ‘Rural settings ... are acceptable in principle.’ As for setting a time limit for ‘assimilation’, that is a plainly an unworkable suggestion.
- 4.21.10 Criterion 6 is not needed. It is clear that environmental quality and nature conservation value will be considered. These are matters that are already addressed throughout the Plan in generic policies. Their provisions do not require repetition in each subject policy, as the Plan should be read as a whole. The same applies to agricultural land quality. I think criterion 7 reasonable as it stands; the wording would not prevent it being applied with regard to the particular circumstances.
- 4.21.11 Criterion 8 is unnecessary. Circular 1/06 advises that, ‘In general gypsy and traveller sites should not be located on significantly contaminated land, but this does not necessarily rule out all locations near or adjoining motorways, power lines, landfill sites or railways, any more than it does conventional housing.’ This criterion has not been employed elsewhere by the Plan (for example in connection with new housing in the Group Centres or Other Rural Settlements) and I see no reason to do so here. That would not of course rule it out of the consideration at the application stage.
- 4.21.12 Criterion 9 is contrary to the advice in Circular 1/06. The number of pitches should be related to circumstances of the specific size and location of the site *and* the surrounding population size and density. On the latter point – and it is something raised in the representations with specific regard to school places – I agree it is important a site’s size respects the interests of the settled community. I therefore propose a new criterion to reflect para.54 of the Circular.
- 4.21.13 Criterion 10 is reasonable. In line with guidance in PPG25, local planning authorities should consult the Environment Agency about flood risk. However, the need for a flood risk assessment is a matter to be considered when the consultation response has been received. The submission of an assessment has not been made a requirement of Policy LT7 – *Caravan Sites* and, to be fair and consistent, should not be so here. I find the final paragraph of the policy acceptable.
- 4.21.14 The impact of proposals on property values is not a planning consideration. The basic question is not whether owners and occupiers of neighbouring properties would experience financial or other loss from a particular development, but whether the proposal would unacceptably affect amenities and the existing use of land and buildings which ought to be protected in the public interest.
- 4.21.15 **Issue h.** The Circular emphasises that gypsies and travellers have the same rights and responsibilities within the planning system as every other citizen. Conditions can be imposed upon a planning permission, or a planning obligation sought, to control the

land use aspects of an activity. But a contract, in the terms sought by the objector, would not be acceptable as a matter of planning policy. The Government's aim is to ensure that planning policies and controls are respected by all sections of the community and that where breaches occur effective enforcement action is taken.

## **RECOMMENDATION**

### **R.4.21. I recommend that the Plan be amended:**

- i. in accordance with PIC44 and IC14, except that paras.4.95 – 4.98 should be revised to reflect the fact that Circular 1/94 has been cancelled by Circular 1/06 and to explain the new approach to provision for gypsies and travellers. This factual update should however;**
  - delete the last sentence of para.4.95;**
  - delete the last 12 words of the final sentence in para.4.96;**
  - delete the reference to ‘...Local Plan’ in the penultimate sentence of para.4.97; and**
  - delete the phrase ‘...and weighted against the other policies of the Plan’ in para.4.98;**
- ii. by replacing the first line of Policy HS19 with the following:**

**‘Planning permission will be granted for new gypsy and traveller sites where there is an unmet need, or a need arises unexpectedly, and provided that the following criteria are satisfied:’;**
- iii. by rewording criterion 10 to read, ‘The site would not be at high risk of flooding or rapid inundation.’;**
- iv. by including a new criterion, to read, ‘Sites should respect the scale of the nearest settled community and should avoid placing undue pressure on the local infrastructure.’; and**
- v. by deleting criteria 1, 6, 8 and 9, and re-numbering the remaining criteria accordingly.**

**HS General - Objections**

007/001	F	Mr R W Green
008/002	F	Lutton Parish Council
008/003	F	Lutton Parish Council
013/001	F	S & R Bingham
018/001	F	D A Browne
019/001	F	Mrs Jean Dewirst
021/001	F	Mrs Alison Murfet
026/007	F	Lincolnshire County Council (Hyder)
027/001	F	Mr & Mrs J Anderson
033/001	F	Mr & Mrs M E G O'Sullivan
053/002	F	Crowland Chamber of Trade
055/001	F	Mr Bryan Turner
060/001	F	C Wright & Son (Gedney) Ltd
061/001	F	Mrs A Cook
064/001	F	Mr G H Whitwell
065/001	F	Gedney Parish Council
065/002	F	Gedney Parish Council
065/003	F	Gedney Parish Council
068/002	F	Old Hall Farm Co Ltd
080/001	F	Mrs K Pestell
083/001	F	Messrs I & B Cunnington
095/002	F	Councillor M A Pell
097/051	F	Moulton Parish Council
097/052	F	Moulton Parish Council
098/001	F	J B & J M Spridgen
100/001	F	M A Cheer, R H Fletcher, R D M Fletcher, S C Fletcher
103/001	F	Mr N Wood
105/001	F	Mr Stephen Morris
113/003	F	Crowland Parish Council
115/005	F	RMC Group Services Ltd
126/001	F	Persimmon Homes (East Midlands) Ltd
133/001	F	Mr & Mrs B Twite
137/001	F	Hilda Gotobed
149/010	F	BT
174/001	F	C R M Longstaff Esq
192/001	F	Mrs Joan Deaton
196/003	F	Holbeach Parish Council
198/001	F	Whaplode Parish Council
198/011	F	Whaplode Parish Council
204/002	F	Gosberton Parish Council
245/001	F	Mr Roderick C P Cowan
256/001	F	Cowbit Parish Council
284/001	F	F Laming & Son
286/001	F	R S Earl
287/002	F	J A Dobney
287/003	F	J A Dobney
289/001	F	Mrs S Mortimer, Mrs J Wilson & Trustees Of Mrs J Wilsons Estate

289/003	F	Mrs S Mortimer, Mrs J Wilson & Trustees Of Mrs J Wilsons Estate
290/007	F	Allison Homes Eastern Ltd
292/002	F	Mrs E Garner
293/002	F	Mr & Mrs Asprey
294/001	F	Mr & Mrs Tunnard
297/001	F	Ms E Dixon-Spain
311/002	F	Pinchbeck Parish Council
311/004	F	Pinchbeck Parish Council
322/001	F	Mr & Mrs A R Greetham
324/001	F	Mr Tony Worth
343/001	F	Mr Stephen Flett
344/001	F	Mr R S Earl
502/001	R	Mr Ian Stancer
502/002	R	Mr Ian Stancer
502/003	R	Mr Ian Stancer
504/001	R	R Mason (dec)
505/001	R	J Cubley
514/001	R	M J & N J A Gibson
529/001	R	Morgan Cole
532/014	R	Government Office for the East Midlands
532/015	R	Government Office for the East Midlands
532/021	R	Fiona Forgham, Government Office for the East Midlands
537/001	R	A Compton
538/001	R	Mr and Mrs M R Campling
542/001	R	Mr and Mrs Creese
544/001	R	Markillie and Son Ltd
549/001	R	Mr G Hoyles
555/001	R	Crown Estate Commissioners
557/007	R	English Nature
558/005	R	Mrs J Warrick
559/001	R	Mrs Joan Deaton
562/001	R	Myra Clement
566/001	R	PH Franks
566/002	R	PH Franks
572/003	R	A&R Williamson
593/002	R	Fen Properties
643/001	R	Messrs I and B Cunnington
644/001	R	Mr and Mrs R J Beeken
645/001	R	Messrs C Wright & Son
655/005	R	Broadgate Homes Ltd
658/001	R	Mr and Mrs Turner
662/001	R	HBS
665/006	R	Mr P Ruysen
682/003	R	John Hayes MP
682/009	R	John Hayes MP
682/010	R	John Hayes MP
683/089	R	Spalding & District Civic Society
683/090	R	Spalding & District Civic Society
684/004	R	Simon Walton
684/006	R	Simon Walton

**HS1 - Objections**

547/003	R	Abbey Developments Ltd
564/001	R	Mr N Russell
582/001	R	Mr and Mrs J R Blencowe
589/006	R	Michael Parker and Sons
596/001	R	Mr and Mrs A B Hansen
597/001	R	Mr J R Nell Esq
599/001	R	King Family
600/001	R	P J Borst Esq
601/001	R	J D Braybrooks Esq
602/001	R	Mr E M H Todoroff
604/001	R	Mr and Mrs G R Eyett
605/001	R	J Pell and Son
606/001	R	Mrs C A Cave
607/001	R	A G Worth Esq
608/001	R	Parigo Horticultural C Ltd
609/001	R	Messrs KC & M C Casswell
610/001	R	O A Taylor & Sons Bulbs Ltd
610/005	R	O A Taylor & Sons Bulbs Ltd
611/001	R	S Dobney Esq
612/001	R	Mrs M C P Daniels
617/003	R	J J Allen Esq
618/001	R	C Adams Esq
619/001	R	N W Ward Esq
620/001	R	Mr and Mrs J W Needham
621/001	R	Executors of Ralph Sharpe (dec)
622/001	R	Mrs J Tetley
623/001	R	S Hartfil Esq
624/001	R	Mr and Mrs D L Coxen
625/001	R	H Freir Esq
626/001	R	P Van Egmond Esq, C Slooten Ltd
627/001	R	M Fragale Esq
628/001	R	D Forman Esq
629/001	R	Christadelphian Church
630/001	R	C Izatt Esq
631/001	R	S & R Bingham
632/001	R	C Clarke Esq
633/001	R	Mrs M Louis
634/001	R	The trustees of M W Burrell (dec)
635/001	R	B G Runciman Esq
636/003	R	J S Halgarth Esq
637/003	R	Mr N Baines
655/OS	OS	Broadgate Homes (site 637)
638/004	R	Allison Homes Eastern Ltd
638/016	R	Allison Homes Eastern Ltd
654/008	R	Councillor P M Walls
655/008	R	Broadgate Homes Ltd
655/009	R	Broadgate Homes Ltd

667/001 R Mr A Rylott Esq  
 686/007 R HBF  
 686/010 R HBF  
 686/012 R HBF

**APPENDIX A9**

**HS3 - Objections**

257/003 F Abbey Developments Ltd  
 508/002 R Mr Andrew Shortland  
 523/001 R Brown Butlin Group  
 525/002 R Second Site Property  
 532/016 R Government Office for the East Midlands  
 534/003 R Mr Francis Biggadike  
 546/002 R Kingswood Investments Ltd  
 547/004 R Abbey Developments Ltd  
 551/001 R Mr Digby Walker  
 694/OS OS Nene Developments (site 551)  
 555/002 R Crown Estate Commissioners  
 655/OS OS Broadgate Homes (site 555)  
 558/002 R Mrs J Warrick  
 563/001 R Mrs L Drake-Disspain  
 564/002 R Mr N Russell  
 571/001 R St Johns College  
 571/002 R St Johns College  
 572/001 R A&R Williamson  
 587/011 R Southfield Business Park Ltd  
 588/008 R The Environment Agency  
 589/002 R Michael Parker and Sons  
 590/001 R CR Neaverson and Sons  
 591/001 R Mr KH Mills  
 594/001 R EMG Holdings Ltd  
 596/002 R Mr and Mrs A B Hansen  
 597/002 R Mr J R Nell Esq  
 599/002 R King Family  
 600/002 R P J Borst Esq  
 601/002 R J D Braybrooks Esq  
 702/OS OS Mrs T Bailey (site 601)  
 703/OS OS J Conroy (site 601)  
 704/OS OS Mr & Mrs A Cameron (site 601)  
 705/OS OS Mrs C Gunning (site 601)  
 706/OS OS H Conroy (site 601)  
 707/OS OS Petition (site 601)  
 709/OS OS A & N Copland(site 601)  
 710/OS OS Mrs S Bull (site 601)  
 711/OS OS Mr M Crafts & Mr C Woolford (site 601)  
 712/OS OS Mrs M Boon (site 601)  
 713/OS OS Mr & Mrs Koczka (site 601)  
 714/OS OS Mr Bailey (site 601)  
 715/OS OS Mrs C Rodgers (site 601)

602/002	R	Mr E M H Todoroff
604/002	R	Mr and Mrs G R Eyett
605/002	R	J Pell and Son
606/002	R	Mrs C A Cave
607/003	R	A G Worth Esq
608/003	R	Parigo Horticultural C Ltd
609/002	R	Messrs KC & M C Casswell
610/002	R	O A Taylor & Sons Bulbs Ltd
610/006	R	O A Taylor & Sons Bulbs Ltd
611/002	R	S Dobney Esq
612/002	R	Mrs M C P Daniels
617/004	R	J J Allen Esq
618/002	R	C Adams Esq
619/002	R	N W Ward Esq
620/002	R	Mr and Mrs J W Needham
621/002	R	Executors of Ralph Sharpe (dec)
622/002	R	Mrs J Tetley
623/002	R	S Hartfil Esq
624/002	R	Mr and Mrs D L Coxen
625/002	R	H Freir Esq
655/OS	OS	Broadgate Homes (site 625)
626/002	R	P Van Egmond Esq, C Slooten Ltd
627/002	R	M Fragale Esq
628/002	R	D Forman Esq
629/002	R	Christadelphian Church
630/002	R	C Izatt Esq
631/002	R	S & R Bingham
632/002	R	C Clarke Esq
633/002	R	Mrs M Louis
702/OS	OS	Mrs T Bailey (site 633)
703/OS	OS	J Conroy (site 633)
704/OS	OS	Mr & Mrs A Cameron (site 633)
705/OS	OS	Mrs C Gunning (site 633)
706/OS	OS	H Conroy (site 633)
707/OS	OS	Petition (site 633)
708/OS	OS	Mr & Mrs J M Rains (site 633)
709/OS	OS	A & N Copland (site 633)
710/OS	OS	Mrs S Bull (site 633)
711OS	OS	Mr M Crafts & Mr C Woolford (site 633)
712/OS	OS	Mrs M Boon (site 633)
713/OS	OS	Mr & Mrs Koczka (site 633)
714/OS	OS	Mr Bailey (site 633)
715/OS	OS	Mrs C Rodgers (site 633)
634/002	R	The trustees of M W Burrell (dec)
635/002	R	B G Runciman Esq
636/004	R	J S Halgarth Esq
638/006	R	Allison Homes Eastern Ltd
638/007	R	Allison Homes Eastern Ltd
638/008	R	Allison Homes Eastern Ltd
638/009	R	Allison Homes Eastern Ltd
638/010	R	Allison Homes Eastern Ltd

638/011	R	Allison Homes Eastern Ltd
694/OS	OS	Nene Developments (site 638)
654/010	R	Councillor P M Walls
655/002	R	Broadgate Homes Ltd
655/006	R	Broadgate Homes Ltd
655/007	R	Broadgate Homes Ltd
662/002	R	HBS
664/002	R	Boston, Spalding & District Trades Union Council
664/008	R	Boston, Spalding & District Trades Union Council
665/004	R	Mr P Ruysen
666/001	R	Steve and Irene Flett
667/002	R	Mr A Rylott Esq
682/004	R	John Hayes MP
682/005	R	John Hayes MP
686/009	R	HBF
686/011	R	HBF

## APPENDIX A10

### HS4 - Objections

016/001	F	Elsoms Seeds Limited
020/001	F	G M Riddington
029/008	F	Lincolnshire County Council
053/001	F	Crowland Chamber Of Trade
057/001	F	Long Sutton And District Civic Society
113/001	F	Crowland Parish Council
116/002	F	Bernard Matthews Foods Ltd
131/002	F	Michael Parker & Sons
142/001	F	Federation Of Small Businesses
145/001	F	John Dickinson
147/002	F	St John's College
149/001	F	British Telecommunications Plc
175/001	F	J J Allen
178/001	F	C Slooten Limited
179/001	F	Parigo Horticultural Co Ltd
234/002	F	Messrs C Eve & Son
252/001	F	House Builders Federation
305/001	F	South Holland District Labour Party
305/002	F	South Holland District Labour Party
308/011	F	Country Land and Business Association
314/005	F	RSPB
314/018	F	RSPB
314/019	F	RSPB
325/001	F	T M Ward
326/001	F	Mr Hugh Baker
532/017	R	Government Office for the East Midlands
532/018	R	Government Office for the East Midlands
564/003	R	Mr N Russell
587/012	R	Southfield Business Park Ltd
591/002	R	Mr K H Mills

608/004 R Parigo Horticultural C Ltd  
 638/012 R Allison Homes Eastern Ltd  
 655/012 R Broadgate Homes Ltd

**APPENDIX A11**

**HS5 - Objections**

012/002 F Morgan Cole  
 026/006 F Lincolnshire County Council (Hyder)  
 027/002 F Mr & Mrs J Anderson  
 028/001 F Long Sutton Town Centre Partnership  
 041/004 F Holbeach And District Civic Society  
 042/001 F Mr & Mrs J Anderson  
 043/001 F C R Neaverson & Sons  
 056/004 F Long Sutton Parish Council  
 093/PIC33 P J R Maxey  
 093/002 F Maxey & Son  
 113/002 F Crowland Parish Council  
 126/002 F Persimmon Homes (East Midlands) Ltd  
 147/003 F St John's College  
 149/002 F BT  
 159/001 F C Adams Esq  
 169/001 F Messrs E W And N W Ward  
 172/002 F Brown Butlin Group Ltd  
 175/002 F J J Allen Esq  
 180/001 F Messrs H H Bland & Son, A G Worth Esq & Allen's Charity Trustees  
 181/001 F Messrs A G & P W Worth  
 182/001 F Mr & Mrs H Goodley  
 190/002 F Councillor Bryan Alcock  
 199/001 F Ashwood Homes Group  
 199/002 F Ashwood Homes Group  
 208/001 F K M Planning  
 240/001 F Mr R F Rulewski  
 252/002 F House Builders Federation  
 257/011 F Abbey Developments Ltd  
 288/001 F CS Properties  
 300/001 F Mr & Mrs A J Seymour  
 302/001 F Mr Michael Chapman  
 305/003 F South Holland District Labour Party  
 305/004 F South Holland District Labour Party  
 306/001 F Councillor C A Fretwell  
 308/012 F Country Land and Business Association  
 326/002 F Mr Hugh Baker  
 508/001 R Mr Andrew Shortland  
 509/001 R Mr and Mrs J Anderson  
 530/001 R Mr V Wells (cross reference to HS3)  
 564/004 R Mr N Russell  
 567/001 R Specialist On-Site Services Ltd  
 569/001 R John and Susan Reece  
 572/002 R A & R Williamson

584/001	R	W C Greetham
591/003	R	Mr K H Mills
607/004	R	A G Worth Esq
618/003	R	C Adams Esq
619/003	R	N W Ward Esq
621/003	R	Executors of Ralph Sharpe (dec)
623/003	R	S Hartfil Esq
641/001	R	Mr Michael Ernest Chapman
642/001	R	Mr and Mrs A J Seymour
648/001	R	Mr T E Johnson
654/011	R	Councillor P M Walls
655/013	R	Broadgate Homes Ltd
686/013	R	HBF
694/PIC33	P	Nene Developments

## APPENDIX A12

### HS6 - Objections

002/001	R	G A Biggs
008/001	F	Lutton Parish Council
022/001	F	Roberta Brighton
023/001	F	Mrs H M Gotobed
038/003	F	Deeping St Nicholas Parish Council
068/001	F	Old Hall Farm Co Ltd
073/001	F	Weston Parish Council
082/001	F	Mr & Mrs B S Tidswell
093/003	F	Maxey & Son
096/001	F	Councillor Chris Brewis
096/003	F	Councillor Chris Brewis
097/019	F	Moulton Parish Council
101/001	F	Mr J B Drury
115/006	F	RMC Group Services Ltd
117/002	F	Mr T Johnson
127/001	F	S Mackman
128/003	F	Councillor Paul Espin
131/003	F	Michael Parker & Sons
134/002	F	Dr Rachel Turner
134/003	F	Dr Rachel Turner
147/001	F	St John's College
148/003	F	The Crown Estate Commissioners
149/003	F	BT
150/001	F	Mr Robert Tyrrell
152/001	F	Mr & Mrs J W Needham
154/001	F	Christadelphian Church
155/001	F	The Tyrell Family
156/001	F	J L Farms Ltd
157/001	F	R M Oldershaw Esq
158/001	F	Mrs M C P Daniels
158/002	F	Mrs M C P Daniels
160/001	F	Mr & Mrs G R Eyett

161/001	F	The Gedney Hill Estate Charity Trustees
162/001	F	Mrs E M H Todoroff
163/001	F	Mr & Mrs J L Crossland
164/001	F	Mr & Mrs D Coxen
165/001	F	D Forman Esq
166/001	F	M Fragale Esq
167/001	F	H Freir Esq
168/001	F	C Slooten Ltd
170/001	F	The Halgarth Family
171/001	F	The Executors of R C Casswell Deceased
171/002	F	The Executors of R C Casswell Deceased
175/003	F	J J Allen Esq
183/001	F	I Login Esq
185/002	F	R H King & Family
186/001	F	Mrs C A Cave
187/001	F	Mr & Mrs A B Hansen
193/001	F	H K Gott & Son
194/001	F	Councillor Michael D Seymour
195/001	F	Sutton St Edmond Parish Council
196/002	F	Holbeach Parish Council
197/001	F	D W Green D A Green & Sons Ltd
204/001	F	Gosberton Parish Council
205/001	F	Mr Mark Richardson
208/002	F	K M Planning
216/002	F	Mr Robert Congreve
217/001	F	K E Taylor
218/001	F	Mr F C Congreve
219/002	F	Gedney Hill Golf Club
220/001	F	Mr A J Congreve
233/002	F	Mr Trevor Clay R.I.B.A.
239/001	F	Mr R A Franks
253/001	F	Gedney Hill Parish Council
257/012	F	Abbey Developments Ltd
286/002	F	R S Earl
287/001	F	J A Dobney
289/002	F	Mrs S Mortimer, Mrs J Wilson & Trustees Of Mrs J Wilsons Estate
290/001	F	Allison Homes Eastern Ltd
292/003	F	Mrs E Garner
293/001	F	Mr & Mrs Asprey
294/002	F	Mr & Mrs Tunnard
297/002	F	Ms E Dixon-Spain
298/001	F	Patterson Homes Ltd
301/001	F	Mr & Mrs M Pilkington
306/002	F	Councillor C A Fretwell
308/013	F	Country Land and Business Association
326/003	F	Mr Hugh Baker
340/001	F	Mr T Tyrrell
340/002	F	Mr T Tyrrell
511/002	R	Brown & Co
532/019	R	Government Office for the East Midlands
532/020	R	Fiona Forgham, Government Office for the East Midlands

548/001	R	Mr and Mrs Hoyes
561/002	R	Ashwood Homes
564/005	R	Mr N Russell
568/001	R	Brett Casswell
571/003	R	St Johns College
574/013	R	Councillor Chris Brewis
580/002	R	Councillor Bettinson
589/003	R	Michael Parker and Sons
596/003	R	Mr and Mrs A B Hansen
597/003	R	Mr J R Nell Esq
599/003	R	King Family
600/003	R	P J Borst Esq
601/003	R	J D Braybrooks Esq
602/003	R	Mr E M H Todoroff
604/003	R	Mr and Mrs G R Eyett
605/003	R	J Pell and Son
606/003	R	Mrs C A Cave
607/005	R	A G Worth Esq
609/003	R	Messrs KC & M C Casswell
610/003	R	O A Taylor & Sons Bulbs Ltd
610/007	R	O A Taylor & Sons Bulbs Ltd
611/003	R	S Dobney Esq
612/003	R	Mrs M C P Daniels
613/001	R	T Tyrell Esq & H Holmes Esq
614/001	R	Miss K and Miss I Newbon
615/001	R	T Tyrell Esq
620/003	R	Mr and Mrs J W Needham
622/003	R	Mrs J Tetley
624/003	R	Mr and Mrs D L Coxen
625/003	R	H Freir Esq
626/003	R	P Van Egmond Esq, C Slooten Ltd
627/003	R	M Fragale Esq
628/003	R	D Forman Esq
629/003	R	Christadelphian Church
630/003	R	C Izatt Esq
632/003	R	C Clarke Esq
633/003	R	Mrs M Louis
634/003	R	The trustees of M W Burrell (dec)
635/003	R	B G Runciman Esq
636/005	R	J S Halgarth Esq
647/001	R	The Executors R M Oldershaw
650/001	R	Mr F S R Fisher
651/001	R	Mrs B Drury
654/012	R	Councillor P M Walls
655/018	R	Broadgate Homes Ltd
659/002	R	Mrs E Garner
660/002	R	Mr and Mrs Asprey
665/005	R	Mr P Ruysen
667/003	R	Mr A Rylott Esq
670/011	R	Moulton Parish Council

**HS7 - Objections**

511/001	R	Brown & Co
520/001	R	Mrs V Twell
521/001	R	Mrs Mary Waters
531/001	R	E W Fisher & Sons
532/022	R	Fiona Forgham, Government Office for the East Midlands
560/001	R	Mr D G Mountain
564/006	R	Mr N Russell
570/004	R	South Lincs Plant Hire & Sales
582/002	R	Mr and Mrs J R Blencowe
589/004	R	Michael Parker and Sons
596/004	R	Mr and Mrs A B Hansen
597/004	R	Mr J R Nell Esq
598/004	R	Mr and Mrs J S Pond
599/004	R	King Family
600/004	R	P J Borst Esq
601/004	R	J D Braybrooks Esq
602/004	R	Mr E M H Todoroff
604/004	R	Mr and Mrs G R Eyett
605/004	R	J Pell and Son
606/004	R	Mrs C A Cave
609/004	R	Messrs K C & M C Casswell
610/004	R	O A Taylor & Sons Bulbs Ltd
610/008	R	O A Taylor & Sons Bulbs Ltd
611/004	R	S Dobney Esq
612/004	R	Mrs M C P Daniels
617/005	R	J J Allen Esq
620/004	R	Mr and Mrs J W Needham
622/004	R	Mrs J Tetley
624/004	R	Mr and Mrs D L Coxen
625/004	R	H Freir Esq
626/004	R	P Van Egmond Esq, C Slooten Ltd
627/004	R	M Fragale Esq
628/004	R	D Forman Esq
629/004	R	Christadelphian Church
630/004	R	C Izatt Esq
632/004	R	C Clarke Esq
633/004	R	Mrs M Louis
634/004	R	The trustees of M W Burrell (dec)
635/004	R	B G Runciman Esq
636/006	R	J S Halgarth Esq
654/013	R	Councillor P M Walls
657/001	R	Ms Dixon-Spain
667/004	R	Mr A Rylott Esq
672/001	R	Louise Bates
673/001	R	Jason Courtman
674/001	R	Chris Britton
675/001	R	Peter Courtman

676/001 R Tina Heery  
677/001 R Mrs L M Courtman

**APPENDIX A14**

**HS8 - Objections**

012/003 F Morgan Cole  
041/005 F Holbeach and District Civic Society  
056/006 F Long Sutton Parish Council  
093/001 F Maxey & Son  
097/025 F Moulton Parish Council  
144/011 F Councillor P M Walls  
195/004 F Sutton St Edmond Parish Council  
257/014 F Abbey Developments Ltd  
524/001 R Tom Bray  
525/001 R Second Site Property  
529/002 R Morgan Cole  
546/004 R Kingswood Investments Ltd  
638/013 R Allison Homes Eastern Ltd  
655/003 R Broadgate Homes Ltd  
664/006 R Boston, Spalding & District Trades Union Council  
681/003 R Pinchbeck Parish Council  
701/OS OS Mrs M Wyeth (site 681)  
683/021 R Spalding & District Civic Society  
686/014 R HBF