

Post Title: 1.1. How far has the preparation of the Local Plan progressed?

Response Number	465	Respondent Number:	988	Comment Author:	Hume Planning Consultancy Ltd	Client	Broadgate Homes Ltd & Broadgate Builders (Spa	Web Link	
Paragraph Number:	1.1.3	Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:
Policy Number:		Map Number:		The evidence base from the Sustainability Appraisal, the Habitat Regulations Assessment, the Plan Viability Assessment and Infrastructure Delivery Plan as well as the Strategic Flood Risk Assessment and Spatial Strategy Background and Housing Papers collectively, provide a strong platform for the main spatial place decision making that has been incorporated in the preparation of the document and this is supported. This approach builds upon and develops the long term strategy for delivery of the infrastructure required, which was first developed in the 2006 plan, and has been progress and developed with Broadgate for a period of more than 15 years.	The support is acknowledged and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> Soun <input checked="" type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policv <input type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 1.1. How far has the preparation of the Local Plan progressed?

Response Number	540	Respondent Number:	1187	Comment Author:	Spalding and District Civic Society	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		<p>For the attention of the Inspector. We have found comment difficult and time-consuming, owing to the relocation and renumbering of policies and paragraphs and the frequent conflation and discarding of the latter. We are afraid it has sometimes been impossible to match our comments on the 2016 Public Consultation Draft with the present Publication Version. We note that "All comments made in previous consultations will also be submitted to the Secretary of State and understand that they will, moreover, be considered by the Inspector" (Lucy Buttery, SHDC Planning Policy officer, 20 April 2017). All our 2016 comments stand. We had thought the Publication Version would be largely a matter of fine-tuning as the restrictive nature of the comments form implies but find policies and intentions dropped at the last minute (e.g. The Spalding rail-freight interchange and the separation of Spalding and Pinchbeck) and the equally sudden inclusion of others (e. G. The sustainable urban extension for housing in Holbeach and the expansion of Springfields) without their having been any opportunity therefore to comment on their substance. As these are major changes, it must be questioned whether the requirements of community involvement have been fully met.</p>	<p>It is acknowledged the the plan making process is complex, long and that it generates vast amounts of evidence, reports and databases of consultation responses. It is also a process that is strictly regulated by legislation. It is asserted that the Local Plan has been prepared soundly and meets the legal requirements.</p> <p>It is inevitable that policies and proposals will evolve between versions of the Local Plan and the Publication Draft is no exception. The plan making body has to decide, in progressing to the Publication stage, what significance the changes are in proportion to the Local Plan as a whole. It is noted that despite identifying examples of such changes the Objectors express no opinion or particular views. The Spalding Rail Freight Interchange was omitted by the July 2016 public consultation.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p>Do you consider that this part of the Local Plan is</p> <p>Legally Compliant <input type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

Response Number	232	Respondent Number:	1690	Comment Author:	Marine Management Organisation	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Re: East Marine Plans and Marine Policy Statement I wonder however, whether it would be applicable for you to include reference also within the Sustainability Appraisal appendix 1 where you list relevant plans and strategies and how they could be considered? I know this would entail splitting the east marine plans by related sections under regional plans and noting related marine plan policy, but you have done this for the NPPF under national plans. I just think this would make the SA sounder and reduce the chance of this being picked up on at a later date.			Officer Comment:	Although no specific explanation of whether LP has a detrimental impact suggestion that SA considers this is reasonable. Add reference to East Marine Plans and Marine Policy Statement to Appendix 1 of the Sustainability Appraisal.
Policy Number:		Map Number:						Officer Recommendation:	Further consideration of this matter will be necessary as part of the Examination.
Site Allocation Number:									
Do you consider that this part of the Local Plan is Legally Compliant <input type="checkbox"/> Soun <input checked="" type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

Response Number	457	Respondent Number:	988	Comment Author:	Hume Planning Consultancy Ltd	Client	Broadgate Homes Ltd & Broadgate Builders (Spa	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Broadgate supports the findings of the Sustainability Appraisal concerning the testing of spatial options and agrees that planned urban extensions to Boston and Spalding should be the focus of the spatial strategy as they represent the most sustainable settlements and have a track record for delivery and attractiveness to the market.		Officer Comment:	The support is noted and welcomed.	
Policy Number:		Map Number:					Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:									
<p><i>Do you consider that this part of the Local Plan is</i></p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Sound <input checked="" type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

Response Number	526	Respondent Number:	932	Comment Author:	DLP (Planning) Ltd	Client	Mr R Hardy and Richard Hardy (Fishtoft)	Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:	
Policy Number:		Map Number:		[Appendices A and B have been provided by email but have not been uploaded due to their size] The Strategic Planning & Research Unit (SPRU) of DLP (Planning) Ltd has undertaken a critical review of the Sustainability Appraisal (SA) of the South East Lincolnshire Local Plan 2011-203. The full report is submitted at Appendix A, however in summary the review has identified a degree of legal non-compliance. If the SA Report its current form were to be challenged in the Courts, it is SPRU's view that a challenge may succeed, with potential ramifications for the Local Plan itself. Ultimately, this could strike out all or specific policies of an adopted Plan from use in decision-making and determining planning applications. The most significant areas of non-compliance are as follows: The SA Report contains no discussion of areas likely to be significantly affected; Inter-relationships between effects do not appear to have been considered; A non-technical summary has been provided separately from the main SA Report, however it does not contain all the information required by the SEA Directive; and The reasons for selecting the preferred land use allocations and the rejection of alternatives is not given. In addition, the review identifies that there are several aspects, that whilst not an issue of legal compliance, do not follow standard good practice on SA. The robustness of the SA as an evidence base for the Local Plan is therefore questioned. As a result the plan is not justified and is consequently unsound. SPRU has also undertaken a review of the sustainability appraisal of eleven sites within the emerging South East Lincolnshire Local Plan (see Appendix B). A general finding of the review was that it is considered that the SA Report is more positive in its assessment of a number of sites than is justified for the following SA appraisal objectives: landscape and townscape; land and waste; and flood risk. The review also considered that the SA was more negative in its assessment of sites for the following SA appraisal objectives: transport. The review found that the SA is considered to be more certain in its assessment of impacts on biodiversity than can realistically be predicted for a number of the sites reviewed and the SA is inconsistent in its appraisal of impacts on flood risks. The review also considers that the SA is inconsistent in its treatment of impacts on sites of international nature conservation importance. As such, the robustness of the SA as an evidence base for the Local Plan is deemed to be questionable, particularly given the inconsistency of	<ul style="list-style-type: none"> • The SA Report contains no discussion of areas likely to be significantly affected; Page 8 of the Sustainability Appraisal Main Report discusses the collection of baseline information – a process that occurred at the scoping stage. The Sustainability Appraisal Scoping Report comprises of twelve individual topic papers, a number of which contain information regarding the environmental characteristics of areas likely to be significantly affected. This information has been extracted from the topic papers and is included as Appendix 2 of the SA Main Report. It is considered that this meets criteria (c) of Annex I of the SEA Directive. • Inter-relationships between effects do not appear to have been considered; The Cumulative Effects section of the SA Main Report also notes inter-relationships between effects where relevant even though this is not specifically signposted as such. A few examples of this include: <ul style="list-style-type: none"> -In paragraph 3.100 it is noted that delivery of the level of housing growth proposed will necessitate the need for some development of greenfield land (a negative effect generated by a number of housing related policies) which could, in turn, have adverse impacts on habitats and species due to land take. -Para 3.101 notes that flood management schemes and SuDS (a significant positive impact of Policy 5) will directly enhance biodiversity through the creation of habitats. -Paragraph 3.106 states that the provision of new and/or enhanced green infrastructure and the protection of biodiversity (positive effects generated by Policies 28 and 24) may help to conserve and/or enhance the appearance or setting of designated and non-designated heritage assets. -Paragraph 3.109 states that the protection of the landscape through policies is likely to have secondary benefits by protecting features such as trees and hedges. Flood mitigation measures (a positive impact of Policy 5) can also promote positive landscape impacts by enhancing the character and appearance of the local area. Additionally, by seeking to avoid adverse harm to the natural and built environment (a positive effect), the Pollution Policy will help steer development away from areas that are of high landscape and townscape character. 				Further consideration of this matter will be necessary as part of the Examination.	
Site Allocation Number:										
Do you consider that this part of the Local Plan is Legally Compliant <input type="checkbox"/> Soun <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input checked="" type="checkbox"/> Justified <input checked="" type="checkbox"/> Effective <input checked="" type="checkbox"/> Consistent with national policv <input checked="" type="checkbox"/>								
Compliant, Sound, Duty to Cooperate explanation:										
Proposed changes to make compliant or sound:	The SA should be reviewed in light of the comments made in the accompanying written representation made on behalf of Mr R Hardy and Richard Hardy (Fishtoft). All sites should be assessed in a consistent manner in order that the SA can provide a robust evidence base to the Local Plan.									
Participate in Examination:	<input checked="" type="checkbox"/>									
Why wish to participate	On behalf of Mr R Hardy and Richard Hardy (Fishtoft) DLP (Planning) Ltd has submitted comprehensive representations to the R.19 consultation which set out in detail that the Plan is both unsound and not legally compliant. We consider that it is appropriate for DLP (Planning) and the Strategic Planning Research Unit (SPRU) to represent Mr R Hardy and Richard Hardy (Fishtoft) at hearing sessions during the examination of the plan to re-state and expand on these written representations and participate in the discussion.									

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

the assessment for different sites. As a result the plan is not justified as it is not based upon a credible or robust evidence base.
The Council's selection of sites is flawed because the evidence based used to justify their selection is not robust.

- A non-technical summary has been provided separately from the main SA Report, however it does not contain all the information required by the SEA Directive;
The Non-Technical Summary refers the reader to Appendix 2 of the Main Report which contains information that meets the requirements of items (c) and (d) of Annex I of the SEA Directive. However, the Non-Technical Summary does set out the key environmental issues which relate to the Local Plan area in Table 1. This table lists a number of environmental characteristics likely to be significantly affected and also refers to The Wash Special Protection Area which is designated under the provisions of the Birds Directive (79/409/EEC). It also references the Wash and North Norfolk Coast Special Area of Conservation which is designated under the provisions of the Habitats Directive (92/43/EEC). It is therefore considered that the requirements of items (c) and (d) of Annex I of the SEA Directive have been met.
- The reasons for selecting the preferred land use allocations and the rejection of alternatives is not given. The reasons for selecting and rejecting the proposed allocation and reasonable alternatives (housing sites) are set out in all of the site assessments contained within Appendices 5 and 6 to the SA Main Report. All of the required information is located in these two appendices.

In an iterative plan-making process, it is not inconsistent with the SEA Directive for alternatives to the proposed policies to be ruled out prior to the publication of the final draft plan, but if that does happen the environmental report accompanying the draft plan must refer to, summarise or repeat the reasons that were given for rejecting the alternatives at the time when they were ruled out and those reasons must still be valid. There are no reasons for alternative sites being rejected at this stage or an earlier stage.
It is considered that the interpretation of the judgment of *Save Historic Newmarket v. Forest Heath DC* [2011] J.P.L. 1233 is inaccurate. The judgment states, "Depending on the case, it might be appropriate to summarise earlier material, refer to it, or repeat it. But there is no need to repeat large amounts of data in a new context in which it is not appropriate." The sustainability of all sites was reconsidered and assessments were updated in light of the receipt of the South East Lincolnshire Strategic Flood Risk Assessment (March 2017) and so it would not be appropriate to

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

include the site assessments from earlier stages as they are outdated.

Further to the similarities between the SEL SA and Save Historic Newmarket v. Forest Heath DC, there is no clear site assessment process undertaken by the Council. It is noted that housing topic papers which supported earlier version of the plan, set out the reasons why sites will not be removed from their status as then preferred allocations, but importantly it is not apparent from any documentation the initial reasoning and justification to allocate sites.

Although not formally documented, a very clear site assessment process has been undertaken. In summary:

- Initial site options were chosen by identifying those sites which were classed as 'developable' in the SHLAA and which scored best in the SA.
- These sites were then subject to public consultation, at which point certain sites were rejected based on the comments received.
- Further sites were submitted to the JSPC through this consultation and so it was decided that further consultation should be undertaken so that these new sites (if identified as being acceptable by the SHLAA and SA) could also be subject to the same level of public scrutiny.
- Taking into account the comments received and the updated SA site assessments (which took into account the new SFRA data), the proposed allocations for the Publication Version Local Plan were chosen.

(It should be noted that SA site assessments were also subject to public consultation at each of these stages)

It is also noted that at paragraph 2.46 of the SA, it is inferred that because a site has planning permission or has been started, there has been no SA of that site. This is not the approach that should be taken in preparing an SA, if land is allocated it should be appraised, to understand the effects of individual sites, but also the cumulative impact. This is further evidence that the Council has taken inconsistent approach to site selection.

The only 'developable' SHLAA sites that were not subject to SA were those where development was known to have commenced already. Because of their commenced status, such sites would not be allocated through the Local Plan process and so there would be no cumulative impact to assess. Sites where planning permission has been granted but development is yet to commence were assessed through the SA.

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

Quality Assurance checklist table

1. The Plan’s purpose and objectives are made clear
It is considered that paragraph 1.8 represents an adequate description of the purpose of the Local Plan. It gives a broad summary of its contents and what status/role it will have once adopted.

10. Realistic alternatives are considered for key issues, and the reasons for choosing them are documented.
It is considered that this step relates to key issues, not options as suggested. Key issues were documented within each of the twelve topic papers of the Scoping Report and are set out in Table 2 of the SA Main Report. The table also outlines the likely future scenario without the plan if the key issues were not to be addressed. It is for those reasons that they were chosen.

13. Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.
It is accepted that no inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained but, as stated, it is not detrimental to the report.

16. Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practicable.
Addressed previously.

19. Both positive and negative effects are considered, and where practicable, the duration of effects (short, medium or long-term) is addressed.)
Appendix 4 of the SA Main Report sets out the appraisal of all of the policies within the Publication Version Local Plan. The assessment matrices all contain three columns relating to the timescales of effects – one which indicates short term effects, one for medium term and another for long term. The matrices also contain the 13 SA objectives. In the appraisal, a score has been assigned against each objective in relation to the anticipated short, medium and long-term effect. Paragraphs 3.12 to 3.62 of the Main Report document represent of summary of the results of the comprehensive appraisal of policies that form Appendix 4. It is therefore not accepted that the timescales of effects have largely been disregarded.

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

The appraisal of policies includes the consideration of a number of aspects relating to health, not just GP surgeries. Consideration was also given to access to green infrastructure, open space, public rights of way, walking and cycling routes and whether it would help encourage greater participation in healthy lifestyles. It also considers amenity issues and whether it would help reduce inequalities in life expectancy.

21. Inter-relationships between effects are considered where practicable.
Addressed previously.

25. Issues to be taken into account in development consents are identified.
Although it is not signposted as such in the site appraisals (contained within Appendices 5-9), there are a number of instances where reference is made to issues that could be addressed through the planning application process. For example:

- Under Objective 2, depending on the type of proposal, it is very frequently suggested that additional/improved healthcare and sports/recreational facilities near the site could be needed to meet the needs of future residents. It also states where additional open space may be required and that if this could be secured through the planning process it would have a positive impact on this objective. In addition, where there is likely to be residential amenity issues, it is suggested that structural landscaping or other measures may be useful in helping mitigation any noise or air pollution and/or visual impact.

- Under Objective 3, for certain sites in Spalding and Boston there is the suggestion that it has the potential to contribute towards the delivery of either the SWRR or BDR. It also states that schemes to address the traffic impact in and around any given settlement should ensure that any increase in traffic does not restrict access to jobs and services, and promotes safe, easy use for all.

- Under Objective 4 (for housing site appraisals) it is stated that the type, tenure and affordability of housing on the site should be informed by an analysis of the function this site should play, alongside other housing sites, in meeting the overall housing need identified in the SHMA.

- Objective 5 considers the likely requirement for additional school capacity that a given housing site could generate.

- Objectives 6 and 7 address possible mitigation

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

measures if biodiversity and/or historic features are located on, or are likely to be affected by, a given site.
-Objective 9 sets out where upgrades may be required to the foul sewerage network, water recycling centres, water supply network and surface water network. It also notes if sewers and/or water mains cross the site (where relevant) and that the design of the site should take this into consideration.

-Objective 11 identifies if a Flood Risk Assessment should be conducted and makes reference to the appropriate use of SuDS.

It is considered that these are all issues that should be taken into account in development consents.

26. Is clear and concise in its layout and presentation. The Non-Technical Summary provides a broad overview of what is cumulatively thousands of pages of information and appraisal. It is not considered that 122 pages is disproportionate when considering this. In addition, 33 of the 122 pages of the Non-Technical Summary are dedicated to summarising the SA findings of all of the site allocations and reasonable alternatives. There is no other reasonable way of expressing this information.

28. Uses maps and other illustrations where appropriate.

The use of maps as suggested would significantly lengthen the report which appears contradictory to the suggestion in the representation that the SA report is not particularly concise.

30. Explains who was consulted and what methods of consultation were used.

It is accepted that the report does not stipulate what methods of consultation were used. However, the Statement of Consultation which accompanies the Publication Version Local Plan sets out in full who was consulted and how at each stage of consultation throughout the Local Plan process.

32. Contains a non-technical summary.
Addressed previously.

39. Monitoring is used, where appropriate, during implementation of the plan to make good deficiencies in baseline information in the SA.

Although not specifically stated, there are monitoring indicators suggested (albeit a limited number) that will help address deficiencies in baseline information in the

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

SA. For example, it was identified in the Historic Environment topic paper of the Scoping Report that 8 of the 24 conservation areas do not currently have Conservation Area Character Appraisals and those that do are 10 or more years old. The indicator ‘number of up-to-date conservation area appraisals’ will therefore help address this issue. In addition, it was identified in the topic paper for Climate Change, Adaptation and Mitigation that an evidence gap exists in relation to the monitoring of renewable energy generation. There are therefore two monitoring indicators that could help address this – ‘technical renewable energy resource potential’ and ‘existing and projected renewable energy development and capacity’.

40. Monitoring enables unforeseen adverse effects to be identified at an early stage. (These effects may include predictions which prove to be incorrect.) The monitoring indicators cover a wide range of topics and issues and, as such, it is hoped that they will enable any unforeseen adverse effects to be identified at an early stage. However, given that the effects are defined as ‘unforeseen’, it is difficult to offer too much explanation at this stage as to how their remediation would be facilitated.

41. Proposals are made for action in response to significant adverse effects. It is accepted that this information is not included, but is something that can be considered in time.

Site assessments

- FEN001, land to the west of Fenside Road, Boston; Objective 3: minor negative score because site is outside the ideal walking distance of both a local shop (1km) and bus stop (400m). Objective 6: site is in close proximity to a LWS and is adjacent to Grange Wood and so it is considered that the minor negative score is justified. Objective 8: open space in this context is intended to mean amenity open space, not an open area of land. The site does not have an open countryside character and is visually contained by the existing built-up area so it considered to warrant a minor positive score. Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the ‘x’ score is appropriate.

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

Objective 12: The SA assessment scores the site as '2/x' not 'x' as stated in the representation.

- EN006, land to the east of Fenside Road, Boston;
Objective 3: minor negative score because site is outside the ideal walking distance of both a local shop (1km) and bus stop (400m).
Objective 5: Both primary and secondary education facilities as well as post-16 facilities are within the ideal walking distances (3.2km and 4.8km respectively) and so a minor positive score is appropriate.
Objective 6: The SA assessment scores the site as '2/x' not 'x' as stated in the representation. It is considered that '2/x' is appropriate score given that part of the site's boundary abuts the River Witham and so it may be necessary to create a buffer between residential development and the river in order to minimize the likelihood of any adverse effects on wildlife and habitats.

Objective 8: The site lies north-west of the open space on Carlton Road and would not result in its loss. Open space in this context is intended to mean amenity open space, not an open area of land.

Objective 10: Although previously developed and greenfield land has not been referenced under this objective, it is included under objective 9 of the appraisals. However it should be noted that, given that one of the Core Principles of the National Planning Policy Framework is that the effective use of land should be encouraged by reusing land that has been previously developed (provided that it is not of a high environmental value), brownfield sites were looked to first when selecting sites for allocation.

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the '2/x' score is appropriate.

- VES002, land to the south of North Forty Foot Bank, Boston;
Objective 3: minor negative score because site is outside the ideal walking distance of both a local shop (1km) and bus stop (400m).
Objective 5: The SA assessment scores the site as '2/x' not '2' as stated in the representation. It is considered

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

that 'x' is an appropriate score given that although both primary and secondary education facilities as well as post-16 facilities are within the ideal walking distances (3.2km and 4.8km respectively), there is a need to increase capacity at these facilities.

Objective 8: The SA assessment scores the site as 'x' not 'xx' as stated in the representation. The site was attributed a minor negative score as although the site is adjacent to the development limits of Boston, without the inclusion of the remaining land to its south as far as Boardsides, the site would have a poor relationship with the existing built-up area and would appear visually incongruous.

Objective 10: Although previously developed and greenfield land has not been referenced under this objective, it is included under objective 9 of the appraisals. However it should be noted that, given that one of the Core Principles of the National Planning Policy Framework is that the effective use of land should be encouraged by reusing land that has been previously developed (provided that it is not of a high environmental value), brownfield sites were looked to first when selecting sites for allocation.

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the 'x' score is appropriate.

- SOU006, land to the south of Chain Bridge Road, Boston;

Objective 3: minor negative score because site is outside the ideal walking distance of both a local shop (1km) and bus stop (400m).

Objective 4: site is attributed the 'x' score because it has the potential to meet affordable housing need and employment opportunities are within a reasonable distance of the site.

Objective 5: The SA assessment scores the site as 'x' not 'x' as stated in the representation. It is considered that 'x' is an appropriate score given that although both primary and secondary education facilities as well as post-16 facilities are within the ideal walking distances (3.2km and 4.8km respectively), there is a need to increase capacity at these facilities.

Objective 6: site is in close proximity to a LWS meaning that development may have an effect on habitats and

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

BAP species and consequently biodiversity. It is considered that the '2/x' score is justified.

Objective 10: Although previously developed and greenfield land has not been referenced under this objective, it is included under objective 9 of the appraisals. However it should be noted that, given that one of the Core Principles of the National Planning Policy Framework is that the effective use of land should be encouraged by reusing land that has been previously developed (provided that it is not of a high environmental value), brownfield sites were looked to first when selecting sites for allocation.

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the '2/x' score is appropriate.

Objective 12: Although most of the areas facilities, services and public transport links are outside the ideal walking distances from the site (meaning that there is less potential to reduce the need to travel by car) there are mitigation measures that should have a positive effect upon carbon absorption particularly if a mix of species and provenance are used to better allow for climate change adaptation. A '2/x' score is therefore appropriate.

- S001, land to the east of Lindis Road, Boston;

Objective 6: There is the potential for positive or negative effects depending on any identified impact on The Wash and any mitigation that is implemented. A '2/x' score is therefore appropriate.

Objective 8: open space in this context is intended to mean amenity open space, not an open area of land.

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the '2/x' score is appropriate.

- S017, land to the south of Wainfleet Road, Boston;

Objective 3: minor negative score because site is outside the ideal walking distance of both a local shop (1km) and bus stop (400m).

Objective 6: There is the potential for positive or negative effects depending on any identified impact on The Wash and any mitigation that is implemented. A

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

'x' score is therefore appropriate.
 Objective 7: The impact on nearby historic assets would depend upon the implementation of mitigation and so it is considered that the 'x' score is appropriate.
 Objective 8: open space in this context is intended to mean amenity open space, not an open area of land.

Objective 10: Although previously developed and greenfield land has not been referenced under this objective, it is included under objective 9 of the appraisals. However it should be noted that, given that one of the Core Principles of the National Planning Policy Framework is that the effective use of land should be encouraged by reusing land that has been previously developed (provided that it is not of a high environmental value), brownfield sites were looked to first when selecting sites for allocation.

Objective 12: Although some of the areas facilities and services, and public transport links, are outside the ideal walking distances from the site (meaning that there is less potential to reduce the need to travel by car) there are mitigation measures that should have a positive effect upon carbon absorption particularly if a mix of species and provenance are used to better allow for climate change adaptation. A 'x' score is therefore appropriate.

- S033, land to the west of Toot Lane, Boston;

Objective 3: minor negative score because site is outside the ideal walking distance of both a local shop (1km) and bus stop (400m).
 Objective 6: There is the potential for positive or negative effects depending on any identified impact on The Wash and any mitigation that is implemented. A 'x' score is therefore appropriate.
 Objective 8: open space in this context is intended to mean amenity open space, not an open area of land.

Objective 10: Although previously developed and greenfield land has not been referenced under this objective, it is included under objective 9 of the appraisals. However it should be noted that, given that one of the Core Principles of the National Planning Policy Framework is that the effective use of land should be encouraged by reusing land that has been previously developed (provided that it is not of a high environmental value), brownfield sites were looked to first when selecting sites for allocation.

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the '2/x' score is appropriate.

Objective 12: Although some of the areas facilities and services, and public transport links, are outside the ideal walking distances from the site (meaning that there is less potential to reduce the need to travel by car) there are mitigation measures that should have a positive effect upon carbon absorption particularly if a mix of species and provenance are used to better allow for climate change adaptation. A '2/x' score is therefore appropriate.

- WYB033, land to the north of Tytton Lane East, Boston;

Objective 3: minor negative score because site is outside the ideal walking distance of both a local shop (1km) and bus stop (400m).

Objective 6: It is considered that the '2/x' score is appropriate. Site is in close proximity to a LWS and has mature trees and hedging along its boundary. There is also the potential for positive or negative effects depending on any identified impact on The Wash and any mitigation that is implemented.

Objective 8: open space in this context is intended to mean amenity open space, not an open area of land. The site also does not have an open countryside character.

Objective 12: Although most of the areas facilities, services and public transport links are outside the ideal walking distances from the site (meaning that there is less potential to reduce the need to travel by car) there are mitigation measures that should have a positive effect upon carbon absorption particularly if a mix of species and provenance are used to better allow for climate change adaptation. A '2/x' score is therefore appropriate.

- IR041, land to the west of London Road, Kirton;

Objective 5: Classification as '0' is an error. The site should be '?', like Kir037.

Objective 6: The Wash SAC, SPA and Ramsar site is outside of the 5km distance being applied in the site assessments. 5km is the distance that Natural England request is used when considering housing development

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

near to such internationally designated assets. A neutral score is therefore considered appropriate.

Objective 7: open space in this context is intended to mean amenity open space, not an open area of land.

Objective 10: Although previously developed and greenfield land has not been referenced under this objective, it is included under objective 9 of the appraisals. However it should be noted that, given that one of the Core Principles of the National Planning Policy Framework is that the effective use of land should be encouraged by reusing land that has been previously developed (provided that it is not of a high environmental value), brownfield sites were looked to first when selecting sites for allocation.

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the '2/x' score is appropriate.

- SUT009, land to the south of Spalding Road and west of Station Road, Sutterton;

Objective 3: minor negative score because site is outside the ideal driving distance of a supermarket (7km) and the ideal walking distance from a bus stop (400m).

Objective 6: site is in close proximity to a LWS meaning that development may have an effect on habitats and BAP species and consequently biodiversity. It is considered that the '2/x' score is justified.

Objective 7: open space in this context is intended to mean amenity open space, not an open area of land.

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the '2/x' score is appropriate.

- SUT028, land to the south of Spalding Road, Sutterton;

Objective 6: site is in close proximity to a LWS meaning that development may have an effect on habitats and BAP species and consequently biodiversity. It is considered that the '2/x' score is justified.

Objective 7: open space in this context is intended to mean amenity open space, not an open area of land.

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

Environment Agency prior to the assessments being updated. It is considered that the '2/x' score is appropriate.

Objective 12: Received a '2/x' because although the majority of services and facilities and public transport links are within the ideal walking distances (which could have a positive impact on minimising the number of car trips generated by the new dwellings), the National Grid have advised that there is no gas in the vicinity of Sutterton and Western Power Distribution considers that the electricity network is currently at capacity.

- WI015, land to the west of Station Road, Swineshead.

Objective 2: 3 out of the 4 types of facility considered under this objective are outside the ideal walking distance. Site is also in close proximity to employment areas, although the effects are not likely to be major and are capable of mitigation. It was therefore scored as a minor negative effect.

Objective 3: minor negative score because site is outside the ideal driving distance of a supermarket (7km) and the ideal walking distance from a local shop (1km).

Objective 6: site is in close proximity to a LWS meaning that development may have an effect on habitats and BAP species and consequently biodiversity. It is considered that the '2/x' score is justified.

Objective 7: open space in this context is intended to mean amenity open space, not an open area of land.

Objective 10: Although previously developed and greenfield land has not been referenced under this objective, it is included under objective 9 of the appraisals. However it should be noted that, given that one of the Core Principles of the National Planning Policy Framework is that the effective use of land should be encouraged by reusing land that has been previously developed (provided that it is not of a high environmental value), brownfield sites were looked to first when selecting sites for allocation.

Objective 11: The way in which sites were scored against the Flood Risk objective was agreed with the Environment Agency prior to the assessments being updated. It is considered that the '2/x' score is appropriate.

Post Title: 1.2. Sustainability Appraisal and Habitats Regulations Assessment

Objective 12: Although most of the areas facilities and services are outside the ideal walking distances from the site (meaning that there is less potential to reduce the need to travel by car) there are mitigation measures that should have a positive effect upon carbon absorption particularly if a mix of species and provenance are used to better allow for climate change adaptation. A 'x' score is therefore appropriate.

Minor change to site assessment for Kir041. The score for Objective 5 should be changed to '?'. No other change required.