

**Post Title:** 2.0 Introduction

<b>Response Number</b>	229	<b>Respondent Number:</b>	1690	<b>Comment Author:</b>	Marine Management Organisation	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>	2.0.1	<b>Table/Figure:</b>		<b>Comment Content</b>			<b>Officer Comment:</b>		
<b>Policy Number:</b>		<b>Map Number:</b>		I am pleased to note reference to the East Marine Plans and Marine Policy Statement within the context (2.0.1) and environmental (7.1.9 and 7.4.1) sections of the plan.		The support is noted and welcomed.		No change to the Local Plan is required.	
<b>Site Allocation Number:</b>									

**Do you consider that this part of the Local Plan is**

Legally Compliant  
 Sound  
 Prepared in accordance with Duty to Cooperate

**Do you consider that the Local Plan is unsound because it is not:**

Positively Prepared  
 Justified  
 Effective  
 Consistent with national policy

**Compliant, Sound, Duty to Cooperate explanation:**

**Proposed changes to make compliant or sound:**

**Participate in Examination:**

**Why wish to participate**

**Post Title:** 2.1 Duty to co-operate

Response Number: 437    Respondent Number: 1207    Comment Author: Home Builders Federation Ltd    Client:    Web Link:

Paragraph Number:    Table/Figure:    Comment Content:    Officer Comment:    Officer Recommendation:

Policy Number:    Map Number:    Site Allocation Number:

*Do you consider that this part of the Local Plan is*

Legally Compliant   
 Sound   
 Prepared in accordance with Duty to Cooperate

*Do you consider that the Local Plan is unsound because it is not:*

Positively Prepared   
 Justified   
 Effective   
 Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate:

The Duty to Co-operate (S110 of the Localism Act 2011 which introduced S33A into the 2004 Act) requires the Council to co-operate with other prescribed bodies to maximise the effectiveness of plan making by constructive, active and on-going engagement. The high level principles associated with the Duty are set out in the National Planning Policy Framework (NPPF) (paras 156, 178, 181) and in twenty three separate paragraphs of the National Planning Practice Guidance (NPPG). In determining if the Duty has been satisfactorily discharged it is important to consider the outcomes arising from the process of Co-operation and the influence of these outcomes on the Local Plan. One of the required outcomes is the delivery of full objectively assessed housing needs (OAHN) for market and affordable housing in the housing market area (HMA) as set out in the NPPF (para 47) including the unmet needs of neighbouring authorities where it is reasonable to do so and consistent with sustainable development (NPPF para 182). The HBF commends the two authorities of Boston Borough Council and South Holland District Council for coming together to produce a joint South East Lincolnshire Local Plan for the plan period 2011 - 2036. The joint plan area is bordered by seven neighbouring authorities of East Lindsey, North Kesteven, South Kesteven, Fenland and King's Lynn & West Norfolk District Councils as well as City of Peterborough Council. It is noted that the two authorities comprise two separate HMA's with Boston described as its own HMA and South Holland forming part of the Peterborough sub region HMA together with Peterborough, Rutland and South Kesteven Councils. The HBF has reservations about whether or not Boston is its own self-contained HMA as a local authority administrative area rarely functions in isolation. Indeed the Duty to Co-operate Statement dated February 2017 identifies notable links between Boston and East Lindsey (also defined as its own District wide HMA). It is understood that the Peterborough sub region HMA authorities have signed a Memorandum of Understanding setting out an agreed position on OAHN as calculated in the Peterborough HMA & Boston BC SHMA. Update Final Report dated March 2017 by J G Consulting. The Peterborough HMA OAHN is agreed as 2,209 dwellings per annum sub divided as 981 dwellings per annum in Peterborough, 159 dwellings per annum in Rutland, 445 dwellings per annum in South Holland and 624 dwellings per annum in South Kesteven which will

As the Objector notes the Local Plan has been made in accordance with the Duty to Cooperate considerations, particularly, with regard to delivering housing needs.

The Housing White Paper contains a large number of proposals that may or may not become requirements for statutory plan making.

No change to the Local Plan is required.

**Post Title:** 2.1 Duty to co-operate

be met by each individual authority respectively within its Own administrative area. The Duty to Co-operate Statement dated February 2017 also includes confirmation that the neighbouring authorities of East Lindsey, Central Lincolnshire, Kings Lynn & West Norfolk and Fenlands will meet their own OAHN in full without recourse to any assistance to meet unmet needs in South East Lincolnshire. The South East Lincolnshire authorities have responded with a reciprocal confirmation concerning the meeting of their housing needs. However by the time of the South East Lincolnshire Joint Local Plan Examination a Statement of Common Ground explaining Cross boundary Working as proposed in the recently published Housing White Paper "Fixing The Broken Housing Market" may be required. If a Statement of Common Ground is prepared the HBF may wish to submit further comments on the Councils legal compliance with the Duty and any implications for the soundness of the Joint Local Plan in further written Hearing Statements and during oral discussions at the Examination Hearing Sessions.

**Post Title:** 2.3 Spatial Portrait

<b>Response Number</b>	527	<b>Respondent Number:</b>	932	<b>Comment Author:</b>	DLP (Planning) Ltd	<b>Client</b>	Mr R Hardy and Richard Hardy (Fishtoft)	<b>Web Link</b>			
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>				
<b>Policy Number:</b>		<b>Map Number:</b>		<p>[Appendix C has been provided by email but has not been uploaded due to its size] Paragraph 2.3.12 of the Publication Version of the Local Plan outlines that the shortage of affordable housing is a significant issue for the area and outlines a requirement for 100 affordable dwellings per annum in Boston Borough. However, the Plan acknowledges that the delivery of affordable homes in recent years has been much lower than this requirement; just 22 dwellings were completed in Boston Borough in 2015/16. The reference to a requirement for 100 affordable dwellings per annum in Boston is considered to be inaccurate. The Council's SHMA (July 2015) identified a net affordable housing need of 250 dwellings per annum. The Council's evidence shows that the affordable housing need in Boston is worsening with the SHMA update 2017 suggesting that there is a net affordable housing need for 263 dwellings per annum (+13 dwellings since 2015). The affordable housing figure represents some 89% of the housing requirement in the SHMA update for Boston. As advocated in the PPG (paragraph 029 Reference ID: 2a-029-20140306) an increase in the total housing figures included in the Local Plan should therefore be considered as it could help deliver the required number of affordable homes. In this regard SPRU has produced a report on the Objectively Assessed Housing Need (OAN) in Boston Borough and South Holland District (see Appendix C). The report provides evidence to suggest that for Boston there should be an increase of 10% in response to the need for affordable housing. This uplift is considered necessary in order to ensure that the Plan is positively prepared to meet objectively assessed development needs and consistent with national policy. If not the plan is considered to be unsound. As drafted, the Plan is un-sound as it fails to meet objectively assessed housing requirements (it is not positively prepared) and it is not consistent with national planning policy that seeks to boost the supply of housing and requires Local Planning Authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area (paragraph 47, the Framework).</p>	<p>The Local Plan has been prepared positively to the meet the arising housing needs until 2036. The identified requirement of 100 affordable homes per annum for Boston Borough is an assessment derived from the Boston Borough SHMA. It is inaccurate to conclude that the affordable housing need identified by the SHMA is 250 pa as the SHMA also does further analysis to test that figure and suggests that an identified need of 37 pa could also be calculated.</p> <p>The SHMA went further into examining the affordable housing need and concluded that, essentially, based upon those in housing need that sought housing benefit to meet their housing costs, a figure of 100 affordable homes pa annum was a reasonable assessment.</p> <p>Taking account of the deliverability of housing per se (i.e. available sites in sustainable locations and considering past evidence of delivery) and also viability considerations, especially to meet affordable housing needs, a proportion of one third of all housing within Boston Borough would seem to be a realistic and deliverable figure.</p> <p>It is further noted that the housing completions for Boston Borough have risen significantly over the last few years and a significant part of this increase has been affordable homes completions.</p>		<p>No change to the Local Plan is required.</p>				
<b>Site Allocation Number:</b>		<p><b>Do you consider that this part of the Local Plan is</b></p> <p><b>Legally Compliant</b> <input checked="" type="checkbox"/></p> <p><b>Soun</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>								<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p><b>Positively Prepared</b> <input checked="" type="checkbox"/></p> <p><b>Justified</b> <input checked="" type="checkbox"/></p> <p><b>Effective</b> <input type="checkbox"/></p> <p><b>Consistent with national policy</b> <input checked="" type="checkbox"/></p>	
<b>Compliant, Sound, Duty to Cooperate explanation:</b>											
<b>Proposed changes to make compliant or sound:</b>	<p>An increase in the total housing figures included in the Local Plan should be considered as it would assist in the delivery of the required number of affordable homes identified in the evidence base.</p> <p><input checked="" type="checkbox"/></p>										
<b>Participate in Examination:</b>	<input checked="" type="checkbox"/>										
<b>Why wish to participate</b>	<p>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.</p>										

**Post Title:** 2.4 A Vision for South East Lincolnshire

Response Number	361	Respondent Number:	2654	Comment Author:	Historic England	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	The Vision for heritage and natural assets, landscapes and townscapes is welcomed and supported.		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:									

**Do you consider that this part of the Local Plan is**

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- Sound
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**Do you consider that the Local Plan is unsound because it is not:**

- Positively Prepared
- Justified
- Effective
- Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

**Post Title: 2.4 A Vision for South East Lincolnshire**

Response Number	400	Respondent Number:	1281	Comment Author:	Woodland Trust	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		<p>We welcome the reference to sustainable drainage systems in Our Vision. We would also like to see reference made to the contribution which management of the natural environment and in particular tree and woodland planting can make to flood alleviation, in certain circumstances, in South East Lincolnshire. For example, planting in upland areas an help to control flows of water further downstream.</p> <p>Trees can help reduce mitigate surface water flooding in urban situations too, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester suggests that increasing tree cover in urban areas by 10% can reduce surface water run-off by almost 6%. Trees are therefore a useful component of Sustainable Urban Drainage Systems (SuDS), which are now the responsibility of Local Authorities. The Woodland Trust has produced a policy paper illustrating the benefits of trees for urban flooding - Trees in Our Towns - the role of trees and woods in managing urban water quality and quantity - <a href="https://www.woodlandtrust.org.uk/publications/2012/12/tree-in-our-towns/">https://www.woodlandtrust.org.uk/publications/2012/12/tree-in-our-towns/</a>.</p> <p>In rural areas, integrating trees into farming systems can improve water quality and help mitigate flooding, while also supporting production, as set out in the Woodland Trust's paper Planting Trees to Protect Water - The role of trees and woods on farms in managing water quality and quantity - <a href="https://www.woodlandtrust.org.uk/publlcations/2012/08/planting-trees-to-protect-water/">https://www.woodlandtrust.org.uk/publlcations/2012/08/planting-trees-to-protect-water/</a>. A good illustration of the role of trees delivering water outcomes in rural situations is the Pontbren Project, a farmer led approach to sustainable land management in the uplands which discovered that tree planting had unexpected benefits in reducing water run-off from improved grassland - see report <a href="https://www.woodlandtrust.org.uk/publicafions/2013/02/the-pontbren-project/">https://www.woodlandtrust.org.uk/publicafions/2013/02/the-pontbren-project/</a></p>	<p>The benefits of tree planting are acknowledged.</p> <p>However, South East Lincolnshire does not have upland areas and also much farming activity does not require planning permission. As a result we have little influence on these areas, despite the benefits illustrated in the farming publications.</p> <p>The Design Policy refers to appropriate landscaping, the Natural Environment Poloicy refers to addressing gaps in ecological nteworks and the Climate Change Policy refers to trees in the justification.</p> <p>It is considered these adequately address the urban area issues with flood alleviation and heat island cooling.</p>		<p>No change to the Local Plan is required.</p>		
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>Soun <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:** 2.4 A Vision for South East Lincolnshire

<b>Response Number</b>	499	<b>Respondent Number:</b>	2342	<b>Comment Author:</b>	Ashley King Developments	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>		<b>Map Number:</b>		We support the recognition in the Vision of the importance of diversifying the local economy and providing residents with access to higher skilled, better paid jobs close to where they live.	The support is noted and welcomed.		No change to the Local Plan is required.		
<b>Site Allocation Number:</b>									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
<b>Legally Compliant</b>	<input checked="" type="checkbox"/>	<b>Positively Prepared</b>	<input type="checkbox"/>						
<b>Sound</b>	<input checked="" type="checkbox"/>	<b>Justified</b>	<input type="checkbox"/>						
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>	<b>Effective</b>	<input type="checkbox"/>						
		<b>Consistent with national policy</b>	<input type="checkbox"/>						
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									



**Post Title: 2.5 Strategic Priorities**

Response Number: 500 Respondent Number: 2342 Comment Author: Ashley King Developments Client: Web Link:

Paragraph Number: Table/Figure: Comment Content: Officer Comment: Officer Recommendation:

Policy Number: Map Number: Strategic Priority 4 We support the recognition in Strategic Priority 3 that there is a need to identify land in appropriate locations to help diversity and strengthen the economic base of South East Lincolnshire. Strategic Priority 5 We believe that Strategic Priority 5 should be reworded to reflect the need to meet retail needs within the sub-regional centre of Spalding, which will serve the town and wider area. It is essential that this provision is made in a timely manner, to minimise the potential for the loss of trade to other retail centres. The available evidence suggests that it may not be possible to locate new retail development within or on the edge of the town centre, and more peripheral locations may be required; in light of this, the Strategic Objective needs to be worded in a way which makes it clear that the priority here is to meet Sub-regional needs, and that a strategic opportunity must not be missed whilst waiting for the delivery of a town centre site which may never emerge. This issue is currently ignored...  
 Site Allocation Number: The policies and proposals of the Local Plan with regard to retail particularly with regard to Spalding are considered to meet the evidence and sustainable opportunities available. No change to the Local Plan is required.

**Do you consider that this part of the Local Plan is**

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- Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

... and we propose that the following further wording should be added (new wording is underlined): To protect a mutually-supportive hierarchy of vibrant self-contained town centres and secure their enhancement by promoting an appropriate mix and scale of retail, leisure and other town centre uses and by maximising opportunities for regeneration. Timely provision will be made for new comparison retail development at Spalding, to meet the needs of the town and wider Sub-region, in the most appropriate locations available."

Participate in Examination:

Why wish to participate

Because the issues raised in this representation would be best explained to the Inspector in the format of a round-table discussion.