

Post Title: 3.1 Presumption in favour of Sustainable Development

Response Number	466	Respondent Number:	1825	Comment Author:	Gladman Developments Ltd	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Gladman welcome the inclusion of Policy 1 which broadly reflects the presumption in favour of Sustainable development, which should be seen as the golden thread through both plan making and decision taking, including a model policy reflecting the requirements of the presumption in favour of sustainable development is considered prudent practice and widely accepted in Local Plans across the Country and ensures that the planning balance exercise will be undertaken through the decision making process at all times consistent with the requirements of national policy.		Officer Comment:	The support is noted and welcomed.	
Policy Number:	1	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		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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: 3.2 Spatial Strategy

Response Number: 236 Respondent Number: 2781 Comment Author: Mr E Atkinson Client: Web Link:

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

Policy Number: 2 Map Number: Site Allocation Number: No change to the Local Plan is required.

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:

Including even more housing in and around Lutton, already inundated with housing none of which in the last 40 years fits the criteria of any local plan is just disgusting, add to this Lutton contains some of the most contaminated land in the county with more than 20 filled pits, subsoil watercourses and filed drains all of which the Council has allowed development on, The Council are in denial regarding the pits and other problems, but at one time sold photographs of them, the instances of reproductive system cancers within the village was assessed by Doctors and the local vicar at greater than thirty, hardly a surprise when the sold photos showed banned farm chemicals had been dumped in the pits. OS maps also provided by the Council, clearly show the locations of these pits. (now not included in submitted plans!) The number of properties built directly over the pits is around 11, in contravention of building and health regulations and over watercourses and drains, many more, the cost if and when it is revealed could be high as folk come to realise that their home is now worthless, the disregard of the public health and wellbeing has been referred to the environment agency and government who are mulling it over, around the latest property H12/0048/16 there are two pits close by + two on adjacent land (Ropers Gate) a subsoil water course runs under the property, from an area of subsidence which formed a large groundwater pond, drained by the owner, but the drain no longer functions, this can be proven by the photos, with the freeboard at 300mm it is next to a cemetery where the dead are buried at 1.8meters adding to the contamination include in all this that the proposed property is outside the local plan and the boundary of development tells its own story, especially when there have been three refusals on the same site, including one by the planning inspector, one of two recent sites refused then allowed by an unknown individual.

The Policy supports the Objector's concerns as it does not promote housing within the settlement other than that which can take place as infill and overcome the sort of concerns the Objector identifies (e.g. contaminated land).

Post Title: 3.2 Spatial Strategy

Response Number	328	Respondent Number:	2320	Comment Author:	ID Planning	Client	UBS Triton Property Fund	Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	2	Map Number:	2			
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:

We consider that Fulney Hall and the existing residential properties south of Holbeach Road should be included in the development limit for Spalding, along with the existing employment uses and the existing business located immediately south of Holbeach Road as they were in the January 2016 consultation Proposals Map document for Spalding & Pinchbeck.

With the above uses included in the development limit and based on the officer's comments highlighted earlier, it would also be logical to include the building north of Fulney Hall within the development limit' as well. The whole of this area to the A16 is effectively built up.

The development limit for Spalding should therefore include Fulney Hall, the existing building to the north occupied by a dental practice and uses to the south of Holbeach Road including the existing residential uses and uses fronting the main road.

Alternatively, if the development limit is not amended. Those uses north of Holbeach Road (Fulney Hall & existing dental practice) should be incorporated in to the wider Springfields (SHR010) designation.

It is considered necessary to appear at the oral Hearings in order to provide input to the local plan Examination process so that points made

These representations are submitted on behalf of UBS Triton Property Fund, owners of Springfields Outlet and Festival Gardens in Spalding. In representing the interests of Springfields and in the absence of sequentially preferable sites, our client has sought to assist the Council in meeting the need identified in the December 2013 Town Centre and Retail Capacity Study for additional comparison floorspace in Spalding. Policy 2 deals with the Spatial Policy for the Borough. This sets out the settlement hierarchy and areas where development is to be directed. In this context the plan identifies two Sub-Regional Centres of Boston and Spalding. Our clients support the identification to Spalding as one of two sub-regional centres in the Local Plan area. Aside from setting out the settlement hierarchy and areas where development is to be directed in terms of the list of towns, the policy confirms that within the settlement boundaries of Boston and Spalding development will be permitted that supports their roles as Sub-Regional Centres. The settlement boundary for Spalding is shown on the Publication Version Proposals Map (Inset Map No 2). In this respect the Proposals Map identifies Springfields Shopping and Festival Gardens with a specific designation under SHR010 to which Policy 9 and Policy 23 specifically apply. We include below an extract of the Springfields Designation. [extract provided by e-mail] This shows the Springfields Centre outside the development limits for Spalding (red line showing development limit) but incorporating most [not all] of the wider complex north of Holbeach Road including the Springfields Outlet Centre and Festival Gardens, Events and Conference Centre, the Travel Lodge Hotel and the NFU offices fronting Holbeach Road, in the SHR010 designation. We note, however, that Fulney Hall and the building immediately to the north now used as a dental practice, are both outside the SHR010 designation albeit they effectively form part of the wider complex of uses associated with Springfields north of Holbeach Road. In the July 2016 consultation event the Proposals Map for Spalding showed Fulney Hall and existing residential uses to the south of Holbeach Road as being within the development limit for Spalding. The area shown within the development limit for the town also included the existing employment uses to the south of Holbeach Road.

The primary reason for designating the commercial areas and other development situated between the River Welland/Coronation Channel and the A16 (to the north and south of the A151 Holbeach Road) as Countryside is to retain greater control over their future development.

No change to the Local Plan is required.

Participate in Examination:

Why wish to participate

Post Title: 3.2 Spatial Strategy

above can be considered in the context of any other representations put to the Inspector in dealing with this particular matter.

An extract from the Spalding July 2016 Proposals Map is below. [extract provided by e-mail]
 This shows Fulney Hall within the development limit for Spalding.
 We have previously commented on the development limits for Spalding and proposed the inclusion of Springfields within the development limits.
 The Draft South Lincolnshire Local Plan for Consultation in January/July 2016 included Fulney Hall and existing employment/residential uses logically within the development limits of Spalding.
 In responding to our wider representations on Springfields, the Officer's comments on why Fulney Hall and uses south of Holbeach Road were included in the development limits and Springfields was not, is set out in their response to our January 2016 representations when they commented:
 Although the Low Fulney area is within the settlement boundary its built form has a different character to the Springfields site, which has a character similar to nearby neighbourhoods in Spalding. (Officer Comments on Representation 838 by ID Planning - Draft for Consultation January 2016)
 Officer's commented further in the same response that: This means that a settlement boundary does not necessarily include all the dwellings and other developments that may be locally regarded as part of a given settlement, and this is often because there is a discernible gap between the main body of the settlement and an outlying property (our underlining)
 We did not object previously to the inclusion of Fulney Hall and land south of Holbeach Road in the defined development limit for Spalding.
 However, we can see no justification for removing Fulney Hall and uses south of Holbeach Road from the development limit with Fulney Hall now shown as washed over with Countryside designation.
 We consider that Fulney Hall and the existing residential properties south of Holbeach Road should be included in the development limit for Spalding, along with the existing employment uses and the existing business located immediately south of Holbeach Road as they were in the January 2016 consultation document.
 With the above uses included in the development limit and based on the officer's comments above, it would also be logical to include the building north of Fulney Hall within the development limit as well. The whole of this area to the A16 is effectively built up.
 Having regard to the above, we consider the plan is not justified or effective in terms of the amendment made to the Proposals Map between the January 2016 Draft

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Local Plan Consultation and the Publication Version March 2017.
The development limit for Spalding should include Fulney Hall, the existing building to the north occupied by a dental practice and uses to the south of Holbeach Road including the existing residential uses and uses fronting the main road.
In light of the above and in this regard the plan is considered unsound.
Notwithstanding the above, this could be rectified by a minor modification to the development limit for Spalding and inclusion of those uses identified above within the settlement limits as they were in the July 2016 consultation document.

Post Title: 3.2 Spatial Strategy

Response Number	338	Respondent Number:	935	Comment Author:	Longstaff	Client	R S Earl	Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	2	Map Number:	67	We write on behalf of our client with reference to the settlement boundary for Weston Hills as proposed in the South East Lincolnshire Plan Publication Version Inset map 67 attached as Appendix A. In the early stage emerging Local Plan documents, Weston Hills had been divided into two parts, Austendyke and St Johns, which followed historic planning treatment of the village, but in the latest documents, it is being treated as the one settlement it is, and called Weston Hills. The village is proposed to be classified as an Other Service Centre, and have a new development boundary within which, following proposed policies within the emerging Local plan for the settlement type Other Service centre, it will provide to allow for infill development in the proposed settlement boundary. At the present time, that settlement boundary as proposed, does not follow the agreed documented Committee member discussions. As stated above, Weston Hills Austendyke did not have a settlement boundary in the 2006 Local Plan. However in the 1998 Local Plan it did, Inset Map 43 (Appendix B) shows this, and the settlement development boundary included an area of frontage land on Austendyke Road near to Delgate Bank (being opposite to the village pub and shop), as well as a further area of frontage on Austendyke near to the Broadgate crossroads. It is noted from the SELLP Committee Agenda pack documents dated 11 September 2015, particularly pages 14-20 (relevant text highlighted and attached in Appendix C), that planning officers, when advising committee members on the proposed settlement boundaries for the various rural settlements, had followed criteria which stated that for the South Holland smaller rural settlements, they had used the settlement boundaries of the extant 1998 and 2006 Local plans. The Briefing Note document for the Workshop 5 refers that for Weston Hills Austendyke it was proposed to Retain boundaries but with no, or minor changes and minimal opportunities for infill development. (p18) This is distinct from the smaller settlement category villages, where the criteria used was to Retain boundaries but with significant changes removal of boundary for part of settlement or potential for change where non infill development would be encouraged. (also top of p18). The Note of the discussion states that there was confusion, and following further discussion it was agreed for the third and final group of Other Service centres and settlements no amendments would be made to the boundaries of which Weston Hills	The 1998 Local Plan map does show Wsn028 within the Settlement Boundary and shaded as a "Major Housing Proposal". The map for Weston Hills Austendyke for the 11 September 2015 Committee shows the site excluded. The settlement boundary was drawn to mark the boundary between land with a built up character and land with an open character, farmed land, hence why the other site shown on the 1998 plan is shown inside the settlement boundary. The change is consistent with the quote 'Retain boundaries but with no, or minor changes and minimal opportunities for infill development', since it is a minor change for minimal opportunities for infill development. If the site had been retained it would have extended the settlement beyond its current built up character, a precedent that could be repeated many times across the plan area. The minutes of the 11 September 2015 committee are contained in the following meeting's agenda pack for 27 November 2015. It says on page 6 that for 'Other Service Centres and Settlements' - Councillors indicated that they were content with the proposed settlement boundaries in this category and decided that the contents of the Appendices in the report be approved for public consultation. The map of Weston Hills has not changed in relation to the Settlement Boundary for the January 2016, July 2016 and March 2017 consultations.	No change to the Local Plan is required.
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

We ask that a revision is made to the proposed settlement boundary to include the said frontage area on Austendyke near to Delgate Bank that was included in the 1998 Inset Map. We look forward to receiving your consultation response and to seeing a revision made to the Inset Map for the village prior to submission to the Secretary of State. [Appendices sent by email]

The proposed settlement boundaries will shape development in the local villages for the next 20 years, and if an error has been made in not following committee members views, this should be explained to the Inspector. If there are other rural villages in the area where similar error have been made, these should also be given consideration for correction now.

Post Title: 3.2 Spatial Strategy

(Austendyke and St John's were two named villages). It is considered therefore that a clear mistake has been made in the emerging Local plan proposed development boundary for Weston Hills, being that it does not replicate the 1998 Local Plan Inset Maps, as it was intended to do following the stated committee member discussion. Had it done, it would have included the frontage on Austendyke Road near to Delgate Bank, as well as the frontage on Austendyke near to Broadgate which has been proposed to be included.

Response Number:	347	Respondent Number:	2509	Comment Author:	Rollinson Planning Consultancy	Client:		Web Link:	
Paragraph Number:		Table/Figure:		Comment Content:			Officer Comment:		
Policy Number:	2	Map Number:		The identification of Swineshead as a Main Service Centre is welcomed and support offered to the Spatial Strategy set out within proposed Policy 2.	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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: 3.2 Spatial Strategy

Response Number: 387 Respondent Number: 2554 Comment Author: Robert Doughty Consultancy Ltd Client: C & K Hardy, trading as C W Hardy: Web Link:

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

Policy Number: 2 Map Number: 43 We do not believe that the South East Lincolnshire Publication (Pre-Submission) Draft Local Plan can be considered to be sound in respect of Policy 2 - Spatial Strategy which includes Haltoft End within 'Other Service Centre and Settlements'. We are instructed by the owners of a rectangular parcel of land in Haltoft End. With a frontage to the north side of the A52 Boston to Skegness road and amounting to some 1.59ha. The land is referred to as Fre006 in the South East Lincolnshire Strategic Housing Land Availability Assessment (SHLAA) of July 2016, which accompanied and informed the Consultation on the Preferred Sites for Development (July 2016) undertaken by the Joint Planning Authority. The land to the north of our clients' land is not owned by them and the main body of their holding lies to the west of the Hobhole Drain. Our clients' land met the Joint Planning Authority's SHLAA criteria for Availability' and Achievability but was not considered to be 'Suitable for development. On considering the Authority's explanation for this, it would appear that there are two issues the Authority believes it fails to properly address - adverse environmental impacts, and a conflict with the emerging Plan's locational strategy. While the Authority recognises that the land will not have adverse impacts on natural or historic assets, it considers that its development would have an adverse impact on the character and appearance of the area - the site's development would substantially increase the visual impact of the village's built-up area on its open, rural surroundings". We do not agree that the development of Fre006 would have this result. Viewed from the west, from Wainfleet Road and from Bakers Lane, development on the site is and will be screened by the trees along both banks of the Hobhole Drain - which, running north to south, is itself a much more meaningful physical boundary for the west of Haltoft End. From the north - Oak House Lane - the existing development of I Acorn Close has little visual impact, as it is wholly comprised of bungalows and their northern boundary landscaping. The developed Fre006, will similarly have little or no visual impact from the north, particularly if it was to comprise single and one and a half storey dwellings. From the east it is screened by the existing development of Oak House Lane, Forge Close and Acorn Close, and its development would have no visual impact from the south as it is screened by the dwellings on the south side of the A52. With regard to the suggestion that the development of the land

Site Allocation Number: Decisions on a settlement's place in the Spatial Strategy took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements and their Sustainability Credentials (June 2015); the settlement's population; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. Against the above criteria, it is considered that it is appropriate for Haltoft End to be shown as an 'Other Service Centre and Settlement'.
The Spatial Strategy Background Paper identifies that a settlement classified as an 'Other Service Centre and Settlement' will not be evaluated for the purposes of meeting objectively assessed needs for housing (i.e. It will not accommodate any housing allocations). Thus, it is not agreed that it would be appropriate for site Fre006 to be allocated for residential development.
Furthermore, it considered that the site's development would substantially increase the visual impact of the village's built-up area on its open, rural surroundings.

Do you consider that this part of the Local Plan is

Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>
		Consistent with national policy	<input type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:
In order for the Local Plan to be made sound we consider Haltoft End should be re-scheduled as a Minor Service Centre within Inset Map 43 of the South East Lincolnshire Local Plan, that Fre006 should be allocated for residential development, and that the Settlement Boundary for Haltoft End should be amended accordingly.

Participate in Examination:

Why wish to participate:
We consider that it is necessary to participate in the oral part of the Examination in Public to ensure that the debate is fully informed and that our clients' concerns are shared and understood.

No change to the Local Plan is required.

Post Title: 3.2 Spatial Strategy

conflicts with the Local Plan's locational strategy, Policy 2 Spatial Strategy describes Haltoft End as an "Other Service Centre and Settlement" where development that supports its role as a service centre, helps sustain existing facilities or helps meet the service needs of other local communities such as Freiston and Butterwick, will be permitted within the settlement boundary. This accords with Part 8 of the National Planning Policy Framework (NPPF) - "Delivering a wide choice of high quality homes" and in particular with Para 55, which states "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities." It suggests as an example. Where there are groups of smaller, settlements, development in one village may support services in a village nearby." We consider that this is the case in regard to the relationship between Freiston, Butterwick and Haltoft End. However, the Settlement Boundary as shown on Inset Map 43 Haltoft End is drawn in such a way that with the exception of two as yet unimplemented dwellings, there is no allowance for any new development in Haltoft End to be able to support these needs.

Post Title: 3.2 Spatial Strategy

Response Number	391	Respondent Number:	2060	Comment Author:	Robert Doughty Consultancy Ltd	Client	Lincolnshire County Council	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	2	Map Number:		We support Policy 2 as it relates to Holbeach. The plan acknowledges that Holbeach, due to its size and the location of the town, and the presence of the University of Lincoln's National Centre for Food and Manufacturing make the town eligible for the level of growth identified in the plan (Paragraph 3.2.11). The identified sites are capable of delivering growth of the scale identified over the plan period.	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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 checked="" type="checkbox"/>								
Why wish to participate	To support any debate regarding the delivery of site Hob048 and the wider development of Holbeach as part of the wider Growth Strategy.								

Post Title: 3.2 Spatial Strategy

Response Number	397	Respondent Number:	2060	Comment Author:	Robert Doughty Consultancy Ltd	Client	Mr R H Goodley and Mr A M Goodley	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	2	Map Number:		We support Policy 2 as it relates to Holbeach. The plan acknowledges that Holbeach, due to its size and the location of the town, and the presence of the University of Lincoln's National Centre for Food and Manufacturing make the town eligible for the level of growth identified in the plan (Paragraph 3.2.11). The identified sites are capable of delivering growth of the scale identified over the plan period.		The support is noted and welcomed.		No change to the Local Plan is required.	
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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 checked="" type="checkbox"/>								
Why wish to participate	To support any debate regarding the delivery of site Hob048 and the wider development of Holbeach as part of the wider Growth Strategy.								

Post Title: 3.2 Spatial Strategy

Response Number	404	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content			Officer Comment:			
Policy Number:	2	Map Number:	1	We fully support the adoption of a hierarchical approach to directing development to the most appropriate areas enabling the identified growth to be controlled. In particular we welcome the identification of Boston and Spalding as the two sub-regional centres where the majority of development will need to be concentrated. This is a suitable reflection of the relative roles of both these towns in the South East Lincolnshire area, with Boston in particular warranting this status being the second largest town in Lincolnshire. The Local Plan quite rightly seeks to continue to support these settlements to ensure they are able to accommodate the housing, facilities, services and economic opportunities that will be vital if the Local Plan is to be successful in delivering the growth agenda outlined in the Plan. The issue of flood risk is acknowledged in this policy but given its appropriate place in the planning balance to ensure that in Boston the town is able to deliver the development that is both needed and wanted to help fulfill its role as a Sub-Regional Centre. The inclusion of reference to the forthcoming Boston Barrier is particularly welcome with its potential effects on the viability of new development in Boston. The policy text also cross references the need for major improvements to highways in both Boston and Spalding. The ability for the Local Plan to play its part in enabling some of the funding of such highways infrastructure reflects a key element of the Local Plan approach. A long term approach enabling housing/economic growth that delivers on the major strategic objectives in the local area as well.	Officer Recommendation:					
Site Allocation Number:	Sou 006				Comments noted	No change to the Local Plan is required.				
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> Sound <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	To contribute to any debate regarding the spatial strategy, given our key role in delivering one of the identified SUEs in the Plan									

Post Title: 3.2 Spatial Strategy

Response Number: 410 Respondent Number: 2060 Comment Author: Robert Doughty Consultancy Ltd Client: Bovis Homes Limited Web Link:

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

Policy Number: 2 Map Number: We support Policy 2 as it relates to Holbeach. The plan acknowledges that Holbeach, due to its size and the location of the town, and the presence of the University of Lincoln's National Centre for Food and Manufacturing make the town eligible for the level of growth identified in the plan (Paragraph 3.2.11). The identified sites are capable of delivering growth of the scale identified over the plan period. The comments are noted 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
- 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: To support any debate regarding the delivery of site Hob048 and the wider development of Holbeach as part of the wider Growth Strategy.

Post Title: 3.2 Spatial Strategy

Response Number	436	Respondent Number:	1207	Comment Author:	Home Builders Federation Ltd	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	2	Map Number:		Policy 2 sets out the spatial strategy based on a five tiered structure which is Summarised as :- Sub regional centres of Boston and Spalding (proposed development of 5,900 dwellings and 5,255 dwellings respectively); - 9 named Main Service Centres (proposed dispersed development of 5,330 dwellings); - 19 named Minor Service Centres (proposed areas of limited development of 2,140 dwellings) ; - 43 named Other Service Centres & Settlements (proposed areas of restricted development); - Countryside (proposed restricted development). Policy 2 also determines proposed settlement boundaries and Policy 11 sets out the proposed distribution by settlement. It is noted that the proposed settlement boundaries (Policy 2) are contiguous with the existing permissions and proposed site allocations but are tightly drawn around each settlement. It is incumbent on the Councils to demonstrate that capacity within the settlement boundaries is sufficient to satisfactorily accommodate the minimum housing requirement. Moreover in the future the Councils may not be able to rely on as many windfall sites because most sites are identified in the SHLAA and the restrictions imposed by the proposed tight settlement boundaries. Policy 12 Vernatts (in Spalding) Sustainable Urban Extension (SUE) allocates 4,000 dwellings of which 1,000 dwellings are within the Joint Local Plan plan period (Phases 1 & 2). The remaining 3,000 dwellings are anticipated for delivery beyond the plan period. Policy 13 Holbeach West SUE allocates 900 dwellings of which 750 dwellings are proposed for delivery in the plan period. It is noted that 60% of proposed housing allocations are in Boston and Spalding. It is important that the Councils proposed housing distribution recognises the difficulties facing rural communities in particular housing supply and affordability issues. The NPPG emphasises that all settlements can play a role in delivering sustainable development so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. One of the core planning principles of the NPPF is to "take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it" (para 17) and "to promote Sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities" (para 55). The proposed	The Local Plan is prepared positively, in accordance with the NPPF and to meet the development needs of the plan area. Settlement boundaries have been defined to meet the development needs of the plan area, the sustainability considerations of settlements, deliverability, viability, constraints and also what areas (in respect of the settlements) are considered to have a built character and which a countryside character. The definition of settlement boundaries are considered to have the benefits of providing a degree of certainty of how developemnt needs will be met across the plan area and in respect of individual settlements. That being said, where specific housing needs may arise, the Plan allows for development through Policy 16 Rural Exceptions Sites to come forward. By defining settlement boundaries and also exceptions through Policy 16 the likelihood of windfall development could be expected and also the provision of a significant proportion of development opportunities (available to any developer or individual) can arise. These would be in addition to the specific site allocations proposed by the Local Plan to meet the Objectively Assessed Need.	No change to the Local Plan is required.
Site Allocation Number:						

Do you consider that this part of the Local Plan is

Legally Compliant
 Soun
 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 policv

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

Post Title: 3.2 Spatial Strategy

distribution of housing should meet the housing needs of both urban and rural Communities.

Response Number:	443	Respondent Number:	936	Comment Author:	IBA Planning Ltd	Client:	Mrs T Hunter-Shaw	Web Link:	
Paragraph Number:		Table/Figure:		Comment Content:		Officer Comment:		Officer Recommendation:	
Policy Number:	2	Map Number:		Cro012: My client continues to support the inclusion of Crowland as a Main Service Centre suitable to accommodate a minimum of 500 dwellings over the Plan period.		The support is noted 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

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: 3.2 Spatial Strategy

Response Number	446	Respondent Number:	988	Comment Author:	Hume Planning Consultancy Ltd	Client	Broadgate Homes Ltd & Broadgate Builders (Spa	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	2	Map Number:		<p>The principal focus of the spatial strategy at the identified sub regional centres of Boston and Spalding, alongside appropriate infrastructure delivery, is supported.</p> <p>This spatial approach has been supported by Lincolnshire CC (as Lead Local Flood Authority), the Environment Agency, Internal Drainage Board and both LPA decision makers. The conclusions of Footprint Ecology for the HRA, emphasising that biodiversity mitigation has shaped the development of the local plan is also supported.</p> <p>Broadgate therefore supports the settlement hierarchy and justifies below [see other related comments] why there are Smaller allocated sites, as Well as other Current Omission sites Within the Control of Broadgate, that are Well related to individual settlements and can provide choice for the market and are readily deliverable within a short time frame.</p> <p>In Summary, the Sub-regional Centre focused urban extension spatial strategy model, accompanied by more moderate expansion at the main followed by the "minor service centres, is supported. The safeguarding of the character of many of the smaller rural settlements within the district because of this spatial strategy is also supported.</p> <p>The recognition given by the Plan for the services these centres [Boston and Spalding] provide for the wider catchment area is welcomed.</p>	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:		<p>Do you consider that this part of the Local Plan is</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>Do you consider that the Local Plan is unsound because it is not:</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: 3.2 Spatial Strategy

Response Number: 467 Respondent Number: 1825 Comment Author: Gladman Developments Ltd Client: Web Link:

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

Policy Number: 2 Map Number: Site Allocation Number: In principle, Gladman are supportive of SELJC's decision in seeking to direct growth to the most sustainable settlements, however this should not be at the expense of ensuring that the housing and employment needs of lower order settlements are met. At present, the policy sets out that development outside the defined settlement boundaries will be restricted to that of a countryside location. Such principles are contrary to the requirements of the Framework, which state that sustainable development should be approved without delay in accordance with the presumption in favour of sustainable development. As previously highlighted, the proposed approach does not allow for such consideration to be made, it simply considers the settlement boundaries as a fixed line for the duration of the plan period and for development outside of them would be severely restricted. The approach taken does not allow for the necessary flexibility advocated by the Framework to allow development to come forward outside defined settlement boundaries, where it is both sustainable, and required to meet identified housing needs. For example, in allocating development to meet identified housing needs, there may still be a point where an allocation fails, or cannot come forward for a whole host of reasons. In these circumstances it may then be necessary to identify a sustainable location not previously identified for allocation, outside of the settlement boundary, to allow development to come forward. South East Lincolnshire's towns and villages are popular and attractive places to live for people of all ages and backgrounds. Consequently, there is a ready market for new housing to meet identified housing needs. Greenfield sites that are well related to existing settlements are sustainable and relatively cost effective locations for new growth. This combination of circumstances provides a positive context for efficient, effective and timely housing delivery. Even if the intention of the policy allows a more permissive approach as suggested in paragraph 3.2.17 of the Plan, it appears that chapter 5 solely considers development in the countryside for uses associated with agriculture, replacement dwellings or rural exception sites. Such an approach does not therefore allow for flexibility needed to consider sustainable development opportunities that assist in delivering full OAN beyond such artificial limits. Gladman believe therefore that the policy as currently proposed is unsound.

The Objector's interpretation of Policy 2 is unduly restrictive and inaccurate. Part D (Countryside) of the Policy is not focussed entirely on development requiring a countryside location but allows proposals that can be shown to meet the three broad considerations of sustainable development to come forward. Policy 16 (Rural Exceptions Sites) is similarly a positive response specific to housing needs which might arise.

No change to the Local Plan is required.

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: 3.2 Spatial Strategy

Response Number: 483 Respondent Number: 2080 Comment Author: Savills (UK) Ltd Client: Caudwell Farms Web Link:

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

Policy Number: 2 Map Number: My client has concerns that the Local Plan may not be sound because it does not reflect the priorities of the National Planning Policy Framework or those emerging through Housing White Paper, "Fixing our broken housing market in relation to the creation of thriving rural Communities. The National Planning Policy Framework (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three dimensions to sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. For plan making, Paragraph 14 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area. Paragraph 55 of the NPPF outlines that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Residential development in such settlements can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use, as required by Section 3 of the NPPF: Supporting a Prosperous Rural Economy. The Housing White Paper, "Fixing our broken housing market, published in February 2017 highlights the importance of 'making land available in the right places' and includes proposals for 'supporting small and medium sized sites, and thriving rural communities' within Chapter 1 of the document. The White Paper identifies a number of proposed changes to the National Planning Policy Framework to facilitate these ambitions, including the expectation for "local planning authorities to identify opportunities for villages to thrive' (paragraph 1.33). In addition, the Housing White Paper, February 2017, supports growth in villages and therefore policy should also ensure that there is a positive approach to development in settlements at all levels, including smaller settlements. Villages such as Luton and Luton Gowt, which have local facilities, such as a primary school should be considered as suitable places for some growth at an appropriate scale. In addition, the Housing White Paper confirms that LPA's should be allocating sufficient sites for residential development in Local Plans on small sites which are identified as: "capable of accommodating fewer than 10 units or which are smaller than 0.5ha" and in rural villages. The Plan should therefore consider the allocation of sites for a lower number of dwellings in appropriate locations, including

Proposals within the Housing White Paper are numerous and varied and, the time of preparing this Local Plan, were subject to consultation. Therefore they can be given very little weight.

The Local Plan has been positively prepared and in general conformity with the NPPF.

The "Other Service Centres and Settlements" are acknowledged as sustainable settlements with settlement boundaries which can accommodate infill growth. It is also the case that through Policy 16 (Rural Exceptions Sites) a development that specifically meets the needs of such settlements can come forward.

The housing needs of Luton and Luton Gowts have not been specifically considered by the Local Plan but the sites put forward have been assessed.

The Objector provides no evidence as to why Luton and Luton Gowts has a specific housing need to be met or why the settlement should be considered as a Minor Service Centre.

No change to the Local Plan is required.

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:

It is suggested that consideration is given to the inclusion or allowance for small sites for housing to come forward within all rural settlements, particularly those with local services such as a school. In this way, my client considers that the Local Plan would be in accordance with the NPPF and emerging policy within the Housing White Paper.

Participate in Examination:

Why wish to participate

Post Title: 3.2 Spatial Strategy

Lutton. There are a number of sites within Lutton, which are assessed within the SHLAA (April 2017) as available and achievable for housing, and suitability is constrained primarily by virtue of the settlement hierarchy. These sites, Lutt006, Lutt007 and Lutt008 are considered to represent potential locations for small scale housing development around the village.

Post Title: 3.2 Spatial Strategy

Response Number: 486 Respondent Number: 2685 Comment Author: Savills (UK) Ltd Client: Web Link:

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

Policy Number: Map Number: Site Allocation Number: The market town of Holbeach is identified by Policy 2 as a Main Service Centre. We acknowledge that Holbeach does not play the same role in the area as the sub regional centres of Spalding and Boston, and cannot therefore be defined as such. However, Holbeach is the next most sustainable settlement in South East Lincolnshire and we consider it considerably more so than the other Main Service Centre settlements. Holbeach is also much larger than the other Main Service Centres and this is recognised at paragraph 3.2.11 of the Draft Local Plan. In terms of accessibility, Holbeach is located on the A17 and the A151 and is easily accessible to Spalding, King's Lynn, Wisbech and Peterborough. The town is also well served by public transport with regular buses to King's Lynn and Spalding. Holbeach also has a good range of local services and facilities, with education facilities alone including three primary schools and a secondary school. There is also a campus of the University of Lincoln at the Holbeach Food Enterprise Zone, proposals for expansion of which have recently been approved. This is seen as an important step in seeking to help attract more value-added knowledge economy jobs to the town. Other services and facilities in Holbeach include a Tesco Superstore, numerous shops and restaurants/public houses, a pharmacy, post office, bank, and hotels. It is also notable that RAF Holbeach is located to the north-west of the town, with Holbeach itself being the closest main settlement to the base. Not only does Holbeach benefit from a high level of existing services and facilities, but from proposals for significant employment growth over the forthcoming plan period at Fleet Road Industrial Estate and the Holbeach Food Enterprise Zone. The Holbeach Food Enterprise Zone is one of three projects in Greater Lincolnshire to have been successful in attracting funding to support pilot schemes for developing Food Enterprise Zones. It is anticipated that the Enterprise Zone will bring together top researchers, farmers, manufactures, distributors and retailers. The Holbeach University Campus, which serves the UK's largest concentration of food manufacturing businesses, will play an important role in the development of the Food Enterprise Zone. Policy 2 should therefore be changed to specifically acknowledge the high level of facilities and services which are present in the town, the expanding economic role Holbeach will continue to have over the forthcoming plan period and the opportunity for higher

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 Prepared in accordance with Duty to Cooperate

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Positively Prepared
 Justified
 Effective
 Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

On behalf of St John's College: In order that Policy 2 is positively prepared and therefore made sound, we propose the following additional text, shown in bold: "Within the settlement boundaries of the Main Service Centres development will be permitted that supports their role as a service centre for the settlement itself, helps sustain existing facilities or helps meet the service needs of other local communities. Of all Main Service Centres, Holbeach benefits from the highest base of services and facilities. The town is also to become a focus for further employment growth. As such, and upon the base of services and facilities in the town, requisite levels of housing growth will be planned for to support the planned economic growth of the town."

Participate in Examination:

Why wish to participate

Holbeach is recognised as a significantly different settlement to the the other Main Service Centres. This is also evident in the scale and variety of development proposals for Holbeach. The Plan clearly provides a very significant role for Holbeach within the context of the Plan area. It is unclear how the re-categorisation of the status of the settlement would bring forward any additional growth.

No change to the Local Plan is required.

Post Title: 3.2 Spatial Strategy

requisite levels of housing growth. This will ensure that the Policy is positively prepared.

Response Number:	489	Respondent Number:	2554	Comment Author:	Robert Doughty Consultancy Ltd	Client:	Mrs S Tunnard and Mrs E Asprey	Web Link:	
Paragraph Number:		Table/Figure:		Comment Content:					
Policy Number:	2	Map Number:		Officer Comment:	The support is noted and welcomed.				
Site Allocation Number:				Officer Recommendation:	No change to the Local Plan is required.				

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

We are instructed by clients to review the Publication Draft of the South East Lincolnshire Local Plan with regard to the proposals for Surfleet as set out in what is inset Map No. 23. We support the proposed Policy 2 Spatial Strategy and are pleased to note that Surfleet and Surfleet Seas End are now seen as a single entity and together as a Minor Service Centre, a designation that we support.

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate: We wish to participate in the oral part of the Examination to secure the allocation of our clients' land at Sur016, by expressing its advantages, including the early availability.

Post Title: 3.2 Spatial Strategy

Response Number: 501 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: Site Allocation Number: Sub-Regional Centre

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:

Re-designate Holbeach as a new tier of settlement, between the Sub-Regional Centres and Main Service Centres, which could for instance be called a 'Primary Service Centre'.

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.

Sub-Regional Centre
 We Support the identification of Spalding as a Sub-regional Centre. Its status as such is well established, through the previous Regional Plan, due to its clear role as a centre for the provision of services, housing and employment for a wide area. It is also clear from the evidence supporting the Local Plan that it is one of the most sustainable locations for development in the Plan area, and the location with the greatest capacity to accommodate new housing. We agree that it is necessary for Spalding to be identified as one of the main locations for new development, in order to meet the identified need for housing, employment and other supporting development.

Main Service Centres
 We also support the identification of Crowland, Donington and Swineshead as Main Service Centres. These settlements are sustainable locations, which already provide for the needs of their local communities. They also perform a valuable role in providing services to their wider rural hinterland. They each scored well in the Council's Sustainability of Settlements Study, produced in June 2015, to inform the approach to the spatial strategy in the new Local Plan. This showed them to be among the most suitable locations for new development. Additional development in these locations will help to support the retention of existing services and facilities, and ensure that they continue to be sustainable locations at the end of the Plan period.

We note that Swineshead, in particular amongst the settlements within Boston Borough, is relatively less constrained by flood risk, in addition to being a sustainable location for new development. As such, it is particularly well suited to be identified as a Main Service Centre.

Minor Service Centres
 We support the identification of Cowbit and Moulton as Minor Service Centres. Both are settlements which scored well in the Sustainability of Settlements Study, and they are also each locations which are less at risk from flooding than is the case for many of the settlements in the Plan area. They are therefore entirely suitable locations for development which can help to meet local housing needs and continue to sustain existing Services.

Holbeach
 The Sustainability of Settlements Study (June 2015)

As a Main Service Centre Holbeach is of a different scale and character to the other Service Centres in this category. That being said the proposals for Holbeach are also of a different scale to the other main Service Centres which reflects its importance which is considered to reflect its role.

No change to the Local Plan is required.

Post Title: 3.2 Spatial Strategy

showed that Holbeach is the most sustainable location for development outside of Spalding and Boston, with a significantly higher score than the next most sustainable location, Long Sutton (223 compared to 171). This means that Holbeach effectively sits between the quite disparate categories of Sub-Regional Centre and Main Service Centre. It has the potential to play a greater role in the functionality of South Holland as a District than merely to serve a relatively small local catchment. The draft Local Plan recognises the quite different status which Holbeach merits, in its proposals for housing allocations. The supporting text to Policy 2 notes that "Holbeach is of a very different scale to the other Main Service Centres'. Policy 11 accordingly allocates 2,100 new dwellings to Holbeach, which effectively represents an interim level between the 5,000+ proposed for the two sub-regional centres of Spalding and Boston and the far smaller allocations for the other Main Service Centres, which are around an eighth to a quarter of Holbeach's proposed allocation. We support this general approach, although we believe that there is scope for the housing allocation for Holbeach to be higher, to accommodate other opportunities for sustainable growth around the town; these opportunities are highlighted in our separate representations. Holbeach already benefits from a good range of employment, including the University of Lincoln's National Centre for Food Manufacturing, and now the proposed new Food Enterprise Zone. It therefore has the potential to provide a range of types of job. However, in order to support new employment provision, it is necessary to provide an adequate supply and range of housing close to sources of employment, which will greatly improve the prospects for the success of new employment proposals, as well as creating sustainable commuting patterns, bringing housing and employment closer together. This will also be of great benefit to existing businesses in the town. Additional development at Holbeach can help to create an increasingly self-sufficient and sustainable town. The Local Plan has identified opportunities for new employment development, and the town already has a far greater range of services and facilities than other Main Service Centres. New development in Holbeach can lead to a regeneration of its town centre, by creating additional demand for shops and facilities. Over time it can also increase choice and variety within the town centre, and help to sustain and grow current success stories, such as the street market. Given the town's central location within South Holland District, and the very large parish within which Holbeach sits,

Post Title: 3.2 Spatial Strategy

additional facilities here also have the potential to reduce the need for people to travel to higher order settlements such as Spalding. This could therefore have the effect of making development in other nearby settlements more sustainable than would be the case if residents needed to travel further to Spalding or elsewhere for employment or comparison retail. We believe that the Spatial Strategy should identify Holbeach as a location which is suitable in principle to accommodate a higher level of growth than other Main Service Centres. A failure to make such an obvious distinction calls in to question the purpose of Policy 2. This could be achieved with recognition within its own category above the Main Service Centres, which could for instance be called a "Primary Service Centre".

Post Title: 3.2 Spatial Strategy

Response Number	528	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:	2	Map Number:		<p>Policy 2 identifies Boston as a sub-regional centre; at the top of the hierarchy (alongside Boston) where development should be directed.</p> <p>The Boston Borough SHMA (July 2015) identifies that 84.6% of the Borough's housing needs (2011-2036) are within Boston town. At present, Policy 11 proposes to allocate new housing to accommodate 5,900 new homes in Boston (including parts of Fishtoft and Wyberton Parishes). This represents only 78% of the Borough's proposed need (as specified in Policy 10). It is therefore considered that additional allocations should be made in Boston to reflect the evidence in the SHMA to focus development on the town of Boston itself and ensure that the plan is positively prepared. As drafted, the Plan is un-sound as it is not positively prepared to meet objectively assessed housing requirements in Boston.</p>	<p>It is accepted that the proportion of allocated sites identified to meet housing need with regard to the Boston urban area fall below the 85% identified in the SHLAA. That being said the settlement boundary for Boston contains a significant number of unidentified sites either as windfall, infill or sites not currently supported by landowners or developers within the settlement boundary.</p> <p>In proposing the housing allocations for the urban area of Boston it has also been a specific decision to identify a large range of development opportunities from small sites to two urban extensions. The identification of the urban extensions in meeting the housing needs is also evidenced as necessary in meeting infrastructure needs (the Boston Distributor Road) and also present opportunities to meet secondary school needs on the western side of Boston and so significantly reduce traffic movements crossing through the town on a daily basis.</p> <p>In the preparation of the Local Plan the plan making authority were also presented with opportunities to make policy responses to the constraints of flood risk and promote growth in settlements with lower flood risk and to promote more sustainable growth (and infrastructure) for settlements south of Boston and north of Spalding.</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>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:	<p>Further allocations are required in Boston to meet the need identified in the SHMA (July 2015). Specifically Fis017/Fis017a should be allocated for residential development.</p>								
Participate in Examination:	<p><input checked="" type="checkbox"/></p>								
Why wish to participate	<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: 3.3 Development Management

Response Number	406	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		The suggested framework for development management to assess proposals is a logical starting point for planners and developers alike to consider any proposals and how to approach an application. To be effective in achieving the current balance to generate growth and manage new development appropriately, it is important that any assessments required are proportional to the scale of the developments proposed. It is also important that this policy is not too restrictive and that the planning balance is correctly applied. It is highly unlikely that all development proposals will successfully meet all 8 listed criteria. The text should reflect this.	Comments noted. To reference all the circumstances where selective parts of Policy 3 may or may not be a material consideration is not considered to be feasible. All applications and all site circumstances will differ to varying degrees. It is noted that Policy 3 will need to be assessed and used proportionally to these different circumstances some of which will be understood by applicants and some of which the planning authority need to identify in order to properly assess development proposals.		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 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: 3.3 Development Management

Response Number	502	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	3	Map Number:		Policy 3 contains repetition of other policies, which appears unnecessary, and is contrary to national guidance', which states: "In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development." The policy is also written in a way which makes its meaning unclear. The individual criteria are not explained, and the reader would be forced to seek out the other relevant policies in the Plan to determine how to comply with them.	Policy 3 has been provided in the plan give an overview of policy considerations that are likely to be relevant to the vast majority of applications recieved by the decision making authority. In providing such an overview it is accepted that some applications will require specific reference to other policies and, indeed, all the considerations of Policy 3 will not be relevant to everysite site and development proposal. That being said Policy 3 is considered to provide a positive assistance to the implementation of the Plan to the vast majority of applicants in seeking planning permission.		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 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 checked="" type="checkbox"/> Consistent with national policy <input checked="" type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	We suggest that Policy 3 should be deleted, as in its current form it does not add anything to the Plan overall, and it is potentially confusing.								
Participate in Examination:	<input checked="" type="checkbox"/>								
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.								

Post Title: 3.4 Design of New Development

Response Number	314	Respondent Number:	1689	Comment Author:	Environment Agency	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	4	Map Number:		The Environment Agency is generally supportive of this policy, which seeks to secure the mitigation of flood risk through flood-resistant and flood-resilient design. However, we are concerned that the policy is weakened by the phrase 'where they are relevant to the proposal and are viable will be secured'. We would not wish to see required flood risk mitigation being given little weight in the decision making process because of viability concerns, as this could result in people being exposed to a flood hazard that poses a risk to life and will not achieve sustainable development.	Viability was inserted in response to two comments received in the January 2016 Consultation from 'Clowes Developments NW' and 'Amec Foster Wheeler'. It is considered that in order for the issues to be secured, they will have to be viable, and so it is acceptable for 'and are viable' to be removed from the policy.		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 checked="" 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 type="checkbox"/> Justified <input checked="" 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:	We request the reference securing the design measures only "where they.....are viable" is deleted to read: 'issues, where they are relevant to the proposal will be secured':								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 3.4 Design of New Development

Response Number	362	Respondent Number:	2654	Comment Author:	Historic England	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	the provisions for the historic environment in relation to design are welcomed.		Officer Comment:	The support is noted and welcomed.	
Policy Number:	4	Map Number:			It is considered amending point 16 to include security shutters is reasonable. The final part could be amended to read ..."shop fronts, shutters and signage".		Officer Recommendation:	Further consideration of this matter will be necessary as part of the Examination.	
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 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 checked="" 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:	It is recommended that Point 16 be extended to include and address security shutters as well as signage to ensure effective provisions are made in relation to conserving historic market towns and villages.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 3.4 Design of New Development

Response Number	407	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	4	Map Number:		We welcome the inclusion of a policy specifically aimed at promoting good design in South East Lincolnshire. The comprehensive list in the policy illustrates the myriad of issues that need to be taken into account when designing new developments. We welcome the acknowledgement that the policy does not seek to impose any particular design approaches and that not all 16 items will be applicable in all cases. Reference to viability is also crucial to ensure that the correct balance can be achieved in meeting planning policy requirements and providing viable developments.	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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: 3.4 Design of New Development

Response Number	503	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	4	Map Number:		Policy 4 contains a lot of repetition of other policies, which appears unnecessary, and contrary to national guidance'.	Para 59 of the NPPF also says that "design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally." To this end the design policy lists issues that should be considered by the designer of the scheme and consequently there will be linkages to ther policies. Not all will be relevant to all cases.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Soun	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>						
		Consistent with national policy	<input checked="" type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	<p>It would be helpful if this policy could be simplified, to improve its clarity, and reduce the potential for repetition or confusion with the requirements of other policies.</p> <p>Part 13</p> <p>We suggest that the use of locally sourced building materials should only be required "where practical", and these words should be incorporated within the Policy. Ashley King Developments, as a local developer, is committed to doing all that is reasonably possible to use locally sourced materials, but this aim needs to be considered in the context of the Councils' wider aspirations regarding viable development coming forwards.</p>								
Participate in Examination:	<input checked="" type="checkbox"/>								
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.								

Post Title: 3.5 Strategic Approach to Flood Risk

Response Number	320	Respondent Number:	1689	Comment Author:	Environment Agency	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	5	Map Number:		<p>The Environment Agency is supportive of the strategic approach to flood risk and considers that the Policy will ensure a proper assessment of this is undertaken at the planning application stage. We have supported the Joint Planning Unit (JPU) through the drafting of this policy and its consideration of preferred housing sites. Flood risk, in both the Boston Borough and South Holland District Council areas, is significant and will increase with climate change. Policy 5 and supporting text seeks to direct those proposing development to the necessary considerations and issues that will need to be addressed at the detailed planning application stage. Mitigation requirements are outlined in Appendix C of the South East Lincolnshire SFRA, which are commensurate to the level of risk. In some instances the level of mitigation required may be such as to impact the profitability or even viability of development proposals (we have highlighted where this could be a potential issue for site allocations and have been advised that developers were contacted about this and have provided an assurance that they could still deliver housing in these locations). The Whole Plan Viability Study also recognises providing flood risk mitigation will add to the overall costs of delivery (£6k to £10k per unit). Mitigation measures, such as the need to significantly raise finished floor levels, will also influence the design of housing and could affect the visual impact/amenity on the surrounding area. This has also been highlighted and the JPU has assured us that these issues can be addressed at the Development Management stage. We note the reference to the Boston Barrier, which is a project that the Environment Agency is hoping to deliver within the next 3 years. Its purpose is to provide an increase in flood protection to existing properties. It is not yet known if the delivery of this project will impact on the flood risk mitigation requirements for new development.</p>	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
<p>Do you consider that this part of the Local Plan is</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>Do you consider that the Local Plan is unsound because it is not:</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:	N/A								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 3.5 Strategic Approach to Flood Risk

Response Number	408	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	5	Map Number:		This policy outlines how flood risk will be taken into account for both major proposals as well as any strategic improvements to flood risk over the life of the plan. There appears considerable overlap with development management/design policies for the first of these objectives, although it is welcomed that the policy makes it clear that the allocations in the Plan will negate the need for any further evidence under the sequential test. Site specific FRAs will quite correctly be required with appropriate mitigation measures to be provided to make developments safe for their lifetime. In this respect it will be important to concentrate on ensuring developments are safe, giving appropriate consideration to the probability of flooding and the residual risks associated with breaches of the existing flood defences. In this regard we welcome reference to the Boston Barrier project and the potential benefits this will have in enhancing existing defences.	Comments noted Flood risk is referred to in several policies according to the scale and purpose. It is considered that this is not necessarily repetitive or that consideration of flood risk matters under one policy conflicts with approaches on another.		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"/> Sound <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: 3.5 Strategic Approach to Flood Risk

Response Number	431	Respondent Number:	2327	Comment Author:	Freeths LLP	Client	Larkfleet Homes	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		<p>This submission relates to the Site Allocations Flood Risk Sequential Test ("SAFRST") (February 2017) which is part of the evidence base and informs the distribution of development (Policy 11). The PPG at paragraph 020 states: "As some areas at lower flood risk may not be suitable for development for various reasons and therefore out of consideration, the sequential test should be applied to the Whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk." South East Lincolnshire Council has noted the approach in the PPG and then stated the sequential test has been applied at a settlement by settlement level within each of the three levels of settlement hierarchy where allocations are proposed. This has been undertaken to ensure the spatial strategy for the SELLP is delivered by focusing development within the settlements that are considered to be the most sustainable areas within Boston and South Holland (para 2.25 of SAFRST). The methodology adopted in the SAFRST is flawed. By first establishing that sites would only be compared within each settlement, the sequential test is making assumptions regarding the spatial strategy of the development, without due regard to flood risk. Effectively the SELLP applies an element of the Exceptions test first, in determining a set level of development within a settlement. This does not accord with the methodology set out in the PPG at Diagram 2: application of the Sequential Test for Local Plan preparation. The outcome of this is that flood risk, which is undoubtedly one of the key considerations of the Plan as a whole, is not properly considered in the preparation of the Plan and has not influence the distribution of development between settlement hierarchies and individual settlements. This approach is not sound and fails the justified test, as it does not represent the most appropriate strategy. Furthermore the proposal is contrary to national policy.</p>	<p>The sequential test process in respect of drafting the Local Plan has evolved with the full cooperation and agreement with the Environment Agency.</p> <p>As preceded by the Lincolnshire Coastal Study it was clear that consideration of sequentially preferable sites in isolation of meeting housing needs (i.e. one of the fundamental considerations of the Exceptions Test) was not a practicable option. The Borough of Boston (and the town in particular) was shown to have unprecedented rates of population growth 2001 - 2011 despite significant underdelivery of new homes. Therefore the choice to live and work in Boston was not influenced by the availability of new homes or flood risk.</p> <p>An approach to plan making and site allocation for the plan area lead by the Sequential Test has been explored in the preparation of the Local Plan and it is clear that either sites and settlements without sustainable infrastructure would need to be promoted (an approach partially explored by the January 2013 Strategy and Policies DPD) or development needs would not be met in the large parts of the plan area or met in neighbouring LPA's without the same flood risk constraints. With the evidence of the SHMA's this did not seem to be a realistic or responsible position for the plan making authority to take.</p> <p>It is agreed that the approach of the local plan should not be "an exercise limited to simply choosing the best sites within each settlement" . The housing needs of settlements is a significant consideration and together with assessments of sustainability indicators, site availability, deliverability and viability (and in the case of the Boston urban area, infrastructure provision) the process of assessing and allocating sites has been far from simple.</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:	<p>The sequential test should be re-produced on an entirely without prejudice basis so that it appropriately contributes to informing the spatial strategy and is not an exercise limited to simply choosing the best sites within each settlement. The application of Exception Test principles should occur after the Sequential Test has been concluded.</p>								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	<p>The approach to flood risk is a fundamental part of the strategy but the current methodology is prejudiced by other assumptions. We wish to raise this in detail with the Inspector.</p>								

Post Title: 3.5 Strategic Approach to Flood Risk

Response Number	447	Respondent Number:	988	Comment Author:	Hume Planning Consultancy Ltd	Client	Broadgate Homes Ltd & Broadgate Builders (Spa	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	5	Map Number:		Policy 5 relating to Flood Risk is also supported which recognises that the SFRA has shaped the spatial strategy and facilitates growth at Boston and Spalding.	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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: 3.5 Strategic Approach to Flood Risk

Response Number	473	Respondent Number:	2075	Comment Author:	Anglian Water	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>As noted in the Council's Infrastructure Delivery Plan (November 2016) there is an expectation that improvements to the existing water supply and foul sewerage networks are expected to be required for the allocation sites identified in the Local Plan. The information previously provided by Anglian Water also identified potential constraints at existing water recycling centres (formerly sewage treatment works) to accommodate specific allocation sites which would need to be addressed through Anglian Water's Business Planning process.</p>			Officer Comment:	<p>The Objector misunderstands the purpose and strategic focus of Policy 5.</p> <p>The assessment of flood risk does include all potential sources of flooding; from the coast, fluvial, pluvial and subsequently surface water flooding. The overpowering of drainage systems maybe a contributory factor but the focus of the Policy is mitigation required to protect occupants from the more extreme events.</p> <p>The provision of SuDS are required by the Policies of the Local Plan (Policies 3 and 4 in particular) and it is here where the concerns of the Objector are likely to be met.</p>
Policy Number:	5	Map Number:		Officer Recommendation:	<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 checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p>Do you consider that the Local Plan is unsound because it is not:</p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input checked="" 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:	<p>We would recommend that Policy 5 includes specific reference to foul and surface water sewerage systems and the potential risk of flooding from these sources. In addition we would also recommend that this policy includes a requirement to separate surface water from the combined system (which conveys both foul and surface water). This is particularly relevant to the Boston area which has a number of combined sewers. Therefore it is suggested that Policy 5 include the following additional text: Development proposals should demonstrate: that adequate foul water treatment and disposal already exists or can be provided in time to serve the development; that no surface water connections are made to the foul system; that surface water connections are made to the public sewerage network are only made in exceptional circumstances where it can be shown where there are no feasible alternatives; that no combined sewer overflows are created in areas served by combined sewers, and that foul and surface water flows are separated; that suitable access is safeguarded for the maintenance of water resources and drainage infrastructure</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 3.5 Strategic Approach to Flood Risk

Response Number	474	Respondent Number:	2075	Comment Author:	Anglian Water	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:		Map Number:		3.5.3 Reference is made to a number of bodies being responsible for flood risk. Anglian Water is responsible for managing the risks of flooding from water and foul or combined sewers systems providing drainage.	Comments noted Minor modification to note Anglian Water's responsibilities.		Minor modification - 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		Do you consider that the Local Plan is unsound because it is not:								
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>							
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>							
Prepared in accordance with Duty to Cooperate	<input checked="" 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:	It is therefore suggested that para 3.5.3 is amended as follows: Lincolnshire County Council as Lead Local Flood Authority, the Environment Agency, Anglian Water as well as the Local Authorities....."									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										

Post Title: 3.5 Strategic Approach to Flood Risk

Response Number	504	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	5	Map Number:		The wording of Policy 5 is convoluted and confusing, and it would be beneficial to improve it. As drafted, it repeats elements of national policy but with omissions which make the policy text confusing. It refers to terms in national guidance, but does not define them, e.g. highly vulnerable and more vulnerable. It is also not clear how it adds any locally distinctive element to national policy.	Policy 5 has been drafted through close working in partnership with the Environment Agency. The Policy is not a facsimile of the NPPF but is focussed on the strategic approach to flood risk considered appropriate to the plan area.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>						
		Consistent with national policy	<input checked="" type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	We suggest that the policy should either be re-written or omitted.								
Participate in Examination:	<input checked="" type="checkbox"/>								
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.								

Post Title: 3.5 Strategic Approach to Flood Risk

Response Number	550	Respondent Number:	1498	Comment Author:	Mr R Williamson	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		without doubt one of the most questionable factors the local plan gives credence to is the environment agency s flood risk assessment.....a computer model guessing at the risk of inundation within the next one hundred years. I have yet to find anybody from the e.a who believes in it. having recently seen housing development in the other south Holland...in the Netherlands..it seems that they are far far less concerned of sinking beneath the waves....if this computer generated guess has any truth behind it..surely we should be in a state of panic ,building boats or running for the hills	Comments noted. The assessment of flood risk particularly over the next 100 years (i.e. that might affect properties built in this era) are an established requirement of national planning policy.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Soun	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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: 3.6 Meeting Physical Infrastructure and Service Needs

Response Number	315	Respondent Number:	1689	Comment Author:	Environment Agency	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	The Environment Agency supports Policy 6 which will ensure that infrastructure, in particular water, drainage and flood management infrastructure, is in place prior to development coming forward. This approach accords with that advocated in the National Planning Policy Framework (paragraph 162), which requires local planning authorities to take account of the need for strategic infrastructure and to ensure the provision of such infrastructure is delivered (paragraph 156). This is essential to ensure that there is no detriment to the water environment/impacts on compliance in the context of the River Basin Management Plans and Water Framework Directive.		Officer Comment:	The support is noted and welcomed.	
Policy Number:	6	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		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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:	n/a								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 3.6 Meeting Physical Infrastructure and Service Needs

Response Number	351	Respondent Number:	2803	Comment Author:	Education and Skills Funding Agency	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	6	Map Number:		The ESFA notes that some growth in housing stock is expected in the areas covered by the local plan; the SHMA confirms a net oncrease of at least 18,675 in South East Lincolnshire HMA area, to the end of the plan period in 2036. This will place additional pressure on social infrastructure such as education facilities. The ESFA welcome the commitment given within paragraph 3.6.5 to search for sites to locate two new secondary schools, to meet the need in Boston and Spalding. We would recommend this strategy be broadened in scope to also include the allocation of sites to meet the future need for both primary and secondary schools. You will no doubt have taken account of key national policies relating to the provision of new school places but it would be helpful if they were explicitly referenced within the document. In particular: a. The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). b. The ESFA supports the principle of South East Lincolnshire safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. c. South East Lincolnshire should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development1 (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system. In light of the above, the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. In line with the Duty to Cooperate, please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan. In this respect, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan	The Local Plan has been prepared with the involvement of the Education Authority at Lincolnshire County Council. The future requirements of education provision at all levels is understood to have been assessed and policy frameworks are in place to help meet future needs.	No change to the Local Plan is required.
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

Post Title: 3.6 Meeting Physical Infrastructure and Service Needs

Document (DPD)2. The DPD provides policy direction and establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. You may also be interested in Barnsley Education Sites Development Plan Document, produced by Barnsley Metropolitan Borough Council, which seeks to provide a framework for the development of education sites within the borough. These DPDs may provide useful guidance with respect to securing site allocations for schools in the emerging South East Lincolnshire's Local Plan as well as providing example policies to aid delivery through Development Management policies. Ensuring there is an adequate supply of sites for schools is essential and will ensure that South East Lincolnshire can swiftly and flexibly respond to the existing and future need for school places to meet the needs of South East Lincolnshire over the plan period.

Response Number	475	Respondent Number:	2075	Comment Author:	Anglian Water	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	6	Map Number:		Anglian Water is supportive of Policy 6 as it states that planning permission will only be granted if it can be demonstrated that there is, or will be sufficient infrastructure capacity for the proposed development. We also welcome the need for developments to be phased to align with the provision of additional infrastructure.	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"/> Sound <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: 3.6 Meeting Physical Infrastructure and Service Needs

Response Number	506	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link															
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:														
Policy Number:	6	Map Number:		Policy 6 should recognise that there may be exceptional circumstances in which other over-riding positive planning benefits may justify the grant of planning permission which would otherwise not comply with the general requirement to meet local infrastructure and service needs. A new development may lead to important social, economic or environmental benefits, such as the restoration of a historic building. This is, for instance, the principle on which the concept of enabling development has developed with regard to historic buildings. It is therefore appropriate for the Local Plan's policies to contain sufficient flexibility to allow for development to come forward, where it can be shown that the benefits arising would justify a shortfall in the provision of development contributions or other infrastructure provision. These benefits should outweigh the dis-benefits inherent in not granting planning permission. A flexible policy approach would allow the actual effects of failing to meet all infrastructure and service needs against the loss of the benefits that the development would otherwise bring. This approach is consistent with the cost/benefit approach advocated by national policy, for instance with regard to development affecting heritage assets, protected landscapes and Wildlife habitats. The matter of whether the development can afford to meet infrastructure and service needs could be considered in light of a viability assessment. The policy's supporting text can clarify that this matter should be considered in relation to Policy 6, which contains more guidance in this regard.	Comments noted.				No change to the Local Plan is required.														
Site Allocation Number:		Do you consider that this part of the Local Plan is <table border="0"> <tr> <td>Legally Compliant</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Sound</td> <td><input type="checkbox"/></td> </tr> <tr> <td>Prepared in accordance with Duty to Cooperate</td> <td><input checked="" type="checkbox"/></td> </tr> </table>			Legally Compliant	<input checked="" type="checkbox"/>	Sound	<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: <table border="0"> <tr> <td>Positively Prepared</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Justified</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Effective</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Consistent with national policy</td> <td><input checked="" type="checkbox"/></td> </tr> </table>		Positively Prepared	<input checked="" type="checkbox"/>	Justified	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>	Consistent with national policy	<input checked="" type="checkbox"/>	Policy 6 is a generic policy and would allow flexibility in consideration of all sites and development proposals.	
Legally Compliant	<input checked="" type="checkbox"/>																						
Sound	<input type="checkbox"/>																						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>																						
Positively Prepared	<input checked="" type="checkbox"/>																						
Justified	<input checked="" type="checkbox"/>																						
Effective	<input checked="" type="checkbox"/>																						
Consistent with national policy	<input checked="" type="checkbox"/>																						
Compliant, Sound, Duty to Cooperate explanation:																							
Proposed changes to make compliant or sound:	In light of this, we believe that Policy 6 should be amended to include a caveat, which will allow for these instances, and we suggest the inclusion of the following text within the Policy: "Planning permission may also be granted for development proposals, Where it would not be viable to meet all infrastructure and Service needs, but on balance the benefits of permitting development would outweigh any likely adverse effects."																						
Participate in Examination:	<input checked="" type="checkbox"/>																						
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.																						

Post Title: 3.6 Meeting Physical Infrastructure and Service Needs

Response Number: 529 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: 6 Map Number: [Appendix D has been provided by email but has not been uploaded due to its size] This objection is largely a repetition of that made previously in ID1: 539. The Officer Comments are the same. No change to the Local Plan is required.

Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:	
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>
		Consistent with national policy	<input checked="" type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:
 The IDP is unsound and needs to be reviewed in light of the information contained in this representation.

Participate in Examination:

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.

[Appendix D has been provided by email but has not been uploaded due to its size]
 Policy 6 of the Publication Version of the South East Lincolnshire Local Plan 2011-2036 sets out that planning permission will be granted for new development provided that developers can demonstrate that there is or will be sufficient physical infrastructure and service needs capacity to support and meet the needs of the proposed development.
 The Policy states that where development might take place over a period of time, the provision of physical infrastructure and services will be phased. The Policy explicitly states that a piecemeal approach to applying for planning permission on a large site or the underdevelopment of a site that seeks to undermine the need to meet the policy requirements of the Local Plan will not be permitted.
 The justification for the Policy is set out, in part, at paragraph 3.6.2 and lists the range of infrastructure items and services that have been identified in the Council's Infrastructure Delivery Plan (IDP). SPRU has undertaken a review of the Council's IDP (Appendix D). The Report concludes that it is clear that with regard to infrastructure the plan fails all four tests of soundness. In particular, the South East Lincolnshire IDP (2016) and therefore the Plan fails to make it clear how the Boston Distributor Road (BDR) will benefit Boston. The transport strategy recognises the need for the scheme, and it will, as stated at paragraph 4.8.1, provide traffic with an alternative route to travelling through and around the town centre and unlock delivery of the proposed housing land. However, there is little evidence to support this. In fact, the Baseline Study is contradictory to this, stating at paragraph 4.23.4: Whilst it was anticipated that the distributor road will have some relieving effect on existing traffic routes by providing an alternative, modelling of the proposals indicated that any benefit to traffic in Boston is marginal. There has been another modelling study completed within the Boston Transport Strategy (also November 2016) however these findings are not referred to in the IDP and it is not clear what the wider impacts or benefits will be. The BDR is also relying on the creation of a new bridge across the South Forty Foot Drain and adjacent railway, which has been a concept for years. However, if this is not built, the development of the BDR, combined with the housing developments, will add to the congestion which already occurs at the

This objection is largely a repetition of that made previously in ID1: 539. The Officer Comments are the same.

No change to the Local Plan is required.

Post Title: 3.6 Meeting Physical Infrastructure and Service Needs

mini roundabout where Boardsides meets the Sleaford Road and the A52 (paragraph 4.8.14 of the IDP). However there is no bridge crossing planned for as of yet, and it does not form part of the Local Transport Plan funding and it is not clear when it will be delivered. This suggests that the BDR may cause more harm than good. The IDP also states that the River Witham needs a bridge and the B1183/Railway/Maud Foster and Willoughby Road needs significant transport structures to cross, estimated at a cost of £80 to £100m. The Baseline Study states at paragraph 4.23.4: there are sections requiring major structures over rail, road and water that cannot be funded at present and, without which, the route will not function as a distributor road. Clearly, they still cannot be funded at present. The modelling scenario in the Boston Transport Strategy (2016) is also based on this infrastructure being provided, and does not model a scenario based on the chance that this infrastructure cannot be funded, which is entirely possible. It is unclear what the impact of the scheme would have on existing transport networks if only partially completed. Either way, the entirety of the infrastructure cannot be provided until after the plan period (this is made clear in the Transport Strategy) and one of the arguments against the BDR (Transport Strategy 2016, page 153) is that funding should be going towards more sustainable schemes which are less intrusive and encourage people to use their car less, and future schemes should be aiming at mitigating climate change, not increasing it. Overall the BDR is deemed unnecessary. The money spent on the scheme could be used to fund other infrastructure which is urgently needed such as schools, leisure and sport facilities and flooding mitigation. The full scheme is simply not viable. And it is again reiterated that there is minimal evidence to support the scheme benefiting the Boston transport network. The inclusion of the BDR in the Plan is unsound, it is not justified by a robust evidence base; furthermore the Council's desire to see it brought forward has influenced the chosen growth option of Boston and sites selected. The currently unallocated site FIS017, as a Sustainable Urban Extension, would be able to provide multiple benefits to the local community through new infrastructure. New schools are urgently needed, as stated in the IDP 2016, which the development could provide, as well as leisure facilities and significant green infrastructure including a network of greenways. Roads to support the development and support the surrounding area would also be constructed, whilst exploiting opportunities to maximise sustainable transport modes. This infrastructure would

Post Title: 3.6 Meeting Physical Infrastructure and Service Needs

have economic, social and environmental benefits. Crucially, the development would also relieve a large amount of Boston's housing need. The various documents reviewed have allowed SPRU to make an assessment of the infrastructure (that has been identified through assessments by the Council) that would benefit Boston the most in terms of the future need identified, some of which could potentially be provided on site FIS017. These are shown in the table below. Table 1 Infrastructure which could be accommodated on site Fis017 Potential Infrastructure

Primary School Secondary School GP Surgery
 Village/Community Hall Synthetic Turf Pitch Junior Football Pitch Outdoor Tennis Court Outdoor Bowling Green Allotments Natural/Semi-natural Greenspace Parks and Gardens Children's Play Area

Post Title: 3.6 Meeting Physical Infrastructure and Service Needs

Response Number	539	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:	6	Map Number:		[See Appendix D (provided by email for the full report)] Summary The SEL IDP (2016) fails to make it clear how the Boston Distributor Road will benefit Boston. The transport strategy recognises the need for the scheme, and it will, as stated at paragraph 4.8.1, provide traffic with an alternative route to travelling through and around the town centre and unlock delivery of the proposed housing land. There is little evidence to support this. In fact, the Baseline Study is contradictory to this, stating at paragraph 4.23.4 of the Baseline Study: Whilst it was anticipated that the distributor road will have some relieving effect on existing traffic routes by providing an alternative, modelling of the proposals indicated that any benefit to traffic in Boston is marginal. There has been another modelling study completed within the Boston Transport Strategy (also November 2016) however these findings are not referred to in the IDP and it is not clear what the wider impacts or benefits will be. The BDR is also relying on the creation of a new bridge across the South Forty Foot Drain and adjacent railway, which has been a concept for years. However if this is not built, the development of the BDR, combined with the housing developments, will add to the congestion which already occurs at the mini roundabout where Boardsides meets the Sleaford Road and the A52 (paragraph 4.8.14 of the IDP). However there is no bridge crossing planned for as of yet, and it does not form part of the Local Transport Plan funding and it is not clear when it will be delivered. This suggests that the BDR may cause more harm than good. The IDP also states that the River Witham needs a bridge and the B1183/Railway/Maud Foster and Willoughby Road needs significant transport structures to cross, estimated at a cost of £80 to £100m. The Baseline Study states at paragraph 4.23.4: there are sections requiring major structures over rail, road and water that cannot be funded at present and, without which, the route will not function as a distributor road. Clearly, they still cannot be funded at present. The modelling scenario in the Boston Transport Strategy (2016) is also based on this infrastructure being provided, and does not model a scenario based on the chance that this infrastructure cannot be funded, which is entirely possible. It is unclear what the impact of the scheme would have on existing transport networks if only partially completed. Either way, the entirety of the infrastructure cannot be provided until after the plan period (this is made clear in the Transport Strategy) and	The benefits of the Boston Distributor Road are modelled by the Boston Transport Strategy and the potential provision of the Road is lead by Lincolnshire Transport Plan 4 (LTP4). The Local Plan has been prepared accordingly. The actual route (apart from modelling to show a western route to be the most beneficial and feasible) and what infrastructure may be required are yet to be modelled and designed. Whilst the proposed allocation of WES002 and SOU006 are supportive of LTP 4 they are also considered to be deliverable sites because they are represented by developers and are at an advanced stage in their planning. FIS017 has been considered as an alternative urban extension. The view of the Joint Committee is that 3 urban extensions are not required to meet the housing need in Boston and the inclusion of FIS017 might require the deletion of one or both urban extensions WES002 and SOU006 and therefore the effective abandonment of the BDR. In a previous representation on meeting the housing needs of the Boston urban area the objectors suggested that the needs should reflect the 85% OAN provided by the SHMA. Reasons for not taking this approach have been given by the officer but the implication of including FIS017 would be to increase provisions for housing needs in Boston by an additional 2000 homes and so the Boston urban area would provide for 7900 new homes. FIS017 has been a known potential site for at least 10 years and in the preparation of the 2006 Boston Local Plan, yet with no further commitment evident from the landowner or a developer in bringing it forward. The Boston Transport Strategy also identifies that the provision of a secondary school on the western side of the Boston urban area (i.e. to serve, in principal, the new urban extensions) would bring significant benefits in reducing traffic across town. Not only would the development of FIS017 not provide a secondary school on the western side of the urban area but it is likely to require an additional secondary school on the eastern		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 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 policy <input checked="" type="checkbox"/>		Compliant, Sound, Duty to Cooperate explanation:		
Proposed changes to make compliant or sound:		The IDP 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).							
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: 3.6 Meeting Physical Infrastructure and Service Needs

one of the arguments against the BDR (Transport Strategy 2016, page 153) is that funding should be going towards more sustainable schemes which are less intrusive and encourage people to use their car less, and future schemes should be aiming at mitigating climate change, not increasing it. Parts of the BDR will be brought forward through sustainable urban extensions, and the argument is that these developments will utilise it. However, the BDR is heavily reliant on these various developments coming forward, and if they fail to this could jeopardise large sections of the scheme. The alternative would be to secure any remaining funding from central government, which is a very competitive process whereby a compelling case to un-lock development from significant amounts of funding is required. The Council have not identified any potential sources of funding, given the required cost it would seem overly ambitious to consider that the necessary funding to complete the scheme would ever be made available, if the County Council are of a position where they consider the distributor road would have little impact. Nevertheless, these developments are not funding the large major structures mentioned above; which the scheme cannot function successfully without. Overall the Boston Distributor Road is deemed unnecessary. The money spent on the scheme by developers could be used to fund other infrastructure which is urgently needed such as schools, leisure and sport facilities and flooding mitigation. The full scheme is simply not viable. And it is again reiterated that there is minimal evidence to support the scheme benefiting the Boston transport network. The currently unallocated site FIS017, as a sustainable urban extension and would be able to provide multiple benefits to the local community through new infrastructure. New schools are urgently needed, as stated in the IDP 2016, which the development could provide, as well as leisure facilities and significant green infrastructure. Roads to support the development and support the surrounding area would also be constructed. This infrastructure would have economic, social and environmental benefits. Crucially, the development would also relieve a large amount of Boston's housing need. The various documents reviewed in this report have allowed SPRU to make an assessment of the infrastructure that would benefit Boston the most in terms of the future need identified, some of which could potentially be provided on site FIS017. These are shown in the table below. Table 6 Infrastructure which could be accommodated on site Potential Infrastructure Primary School Secondary

side of the town.
The plan making authority has to treat the proposal to bring forward FIS017 with considerable caution especially when weighed up against meeting the identified long term infrastructure benefits of the BDR and, in particular, the housing needs of Boston and the plan area.

Post Title: 3.6 Meeting Physical Infrastructure and Service Needs

School GP Surgery Village/Community Hall Synthetic Turf Pitch Junior Football Pitch Outdoor Tennis Court Outdoor Bowling Green Allotments Natural/Semi-natural Greenspace Parks and Gardens Children's Play Area

Soundness of the submitted Plan with regard to infrastructure Positively Prepared The strategy set out in the submitted plan is unlikely to meet the infrastructure needs of the Boston area. The evidence base prepared by the Council sets out several infrastructure items (as listed within this document) that should be delivered. Site FIS017 has the capacity to deliver a selection of these items and help for the Plan to meet identified infrastructure needs. The strategy of the Plan does not specify the necessity to deliver the BDR and it is not supported by an evidence base. The selection of sites for development, in particular WES002 and SOU006 has been skewed to support the delivery of the BDR. Given this issue there is justified concern that the inclusion of these sites has been made not to meet the objectively assessed need for housing (as required to be sound) but instead to deliver an infrastructure item which is not support by an evidence base. Justified The infrastructure set out to be in the Plan is not justified by the evidence base. As set out in earlier sections of this report, the Council's and County Council's evidence regarding the BDR is lacking and is not at all compelling to support its inclusion in the Plan, or for development to be allocated to support its delivery A more appropriate strategy would be for the Council to consider its evidence base and look to bring forward infrastructure items that are deliverable within the Plan period. Effective The plan is not deliverable and the delivery of the objectively assessed need for housing will not be supported by the Council's choices of infrastructure. The delivery of the BDR in full is not deliverable, there is a significant lack of funding and there are no known sources of capital funding from any organisation which may bridge this gap. The evidence base states that the effects of the BDR will not be seen in full unless all 3 sections of it can be completed. Therefore, the part delivery of the BDR will have no positive effect to the local highway network. The inferred purpose of allocations WES002 and SOU006 is to deliver the BDR, which based upon the evidence supporting the Plan is unlikely to ever happen. These allocations are not effective. Consistent with national policy [Rep includes a table which shows an assessment of policies within the Framework this could not be uploaded due to its format]. The infrastructure which the Plan sets to delivery and or safeguard does not meet with national policy, in particular those policies that consider transport issues. Unsound As set

Post Title: 3.6 Meeting Physical Infrastructure and Service Needs

out in the sub-sections above, it is clear that with regard to infrastructure and in particular the BDR, the plan fails all four tests of soundness.

Post Title: 3.7 Developer Contributions

Response Number	245	Respondent Number:	2523	Comment Author:	J Maxey	Client		Web Link		
Paragraph Number:	3.7.11	Table/Figure:		Comment Content	<p>The Whole Plan Viability assessment is flawed. It says at 4.3.30 that developers indicated that build costs were below BCIS levels. Baring in mind that the developer comment to BCIS costs recorded on p51 was no comment, and flood resilient costs add £80-100 per sq m, there is no evidence within the report that justifies the comment within 4.3.30 that developers indicated build cost of £810 excl prelims, which is about 20% below BCIS figures. The report relies upon this statement and the costs used in calculations follow it. BCIS costs are researched from industry information. Previous viability assessments in the District have utilised BCIS figures. If the inputs to the Viability assessment costs are too low this will over state the ability to fund s106 requirements for affordable housing or infrastructure</p>			Officer Comment:	<p>The WPVA has been produced in consultation with the development industry. Its conclusions are outcomes of those consultations and said conclusions present several scenarios. Flood risk mitigation is a variable in terms of development costs but is not an abnormal cost given that flood risk mitigation is a national policy requirement and has been for about 15 years. The relating policy (Developer Contributions) recognises that different sites will have different viability considerations and it does not set a prescribed list of community benefits, infrastructure or Affordable Housing percentage to be attained on each and every site.</p>	
Policy Number:		Map Number:		Officer Recommendation:	<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 checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p>Do you consider that the Local Plan is unsound because it is not:</p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input checked="" 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:	<p>The Viability assessment should be reworked using BCIS costs, and the reduction in viability this will produce be reflected in policy</p>									
Participate in Examination:	<p><input checked="" type="checkbox"/></p>									
Why wish to participate	<p>I would wish to discuss fully the Viability assessment, and the effect of the items challenged upon the ability to fund community benefits.</p>									

Post Title: 3.7 Developer Contributions

Response Number	261	Respondent Number:	2138	Comment Author:	Andrew Burling	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	7	Map Number:		The PBA Viability Assessment is flawed, it does not represent base build costs correctly as the figure use is way lower than BCIS current figures for the area (even for lower quartile levels). The cost of flood prevention measures does not seem to have been represented in the figures and there is no allowance for other abnormal development costs of which all developments have some element of associated cost.	The WPVA has been produced in consultation with the development industry. Its conclusions are outcomes of those consultations and said conclusions present several scenarios. Flood risk mitigation is a variable in terms of development costs but is not an abnormal cost given that flood risk mitigation is a national policy requirement and has been for about 15 years. Ground conditions in Boston e.g. the widespread use of piling is understood to be both a requirement of Building Standards and has been factored in as a cost of development. The relating policy (Developer Contributions) recognises that different sites will have different viability considerations and it does not set a prescribed list of community benefits, infrastructure or Affordable Housing percentage to be attained on each and every site.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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:	The PBA assessments should be re-run taking account of current BCIS figures the flood prevention measures and other associated abnormal costs. For instance in Boston ground conditions require the use of specialist foundations due to poor bearing capacities.								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	Discuss the robustness of the PBD Viability Assessment and the figures used to determine the level of Affordable Housing and associated Planning Gain.								

Post Title: 3.7 Developer Contributions

Response Number	334	Respondent Number:	1238	Comment Author:	Pedals	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>Policy 6 of the 2016 version of the Local Plan listed examples of matters which could be the subject of developer contributions. We supported item 4 of the list was "providing for an improving accessibility within the Local Plan area by a variety of modes of sustainable transport and promotion of sustainable transport modes;" This list has been removed from Policy 7 of the 2017 version. We believe that the policy now lacks the clarity of previous Policy 6 and particularly that item 4 should be reinstated. This omission is an example of where the plan's policies fail to state explicitly how the Councils will put into practice the principles of part 4 of the National Planning Policy Framework and Strategic Priority 11 of this plan.</p>		Officer Comment:	<p>Policy 7 is intended to be an overarching, strategic policy setting out the general approach to developer contributions for a range of matters. The infrastructure specific detail is intended to be covered by infrastructure specific policies elsewhere in the Local Plan. In the case of transport this is Policies 29 and 30. This is referred to in paragraph 3.7.3.</p>	
Policy Number:	7	Map Number:		Officer Recommendation:	<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 checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p>Do you consider that the Local Plan is unsound because it is not:</p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input type="checkbox"/></p> <p>Effective <input checked="" type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>			
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	<p>Policy 7 should be redrafted to include a list of possible subjects for developer contributions. In particular the list should include "providing for and improving accessibility within the Local Plan area by a variety of modes of sustainable transport and promotion of sustainable transport modes;"</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 3.7 Developer Contributions

Response Number	353	Respondent Number:	2803	Comment Author:	Education and Skills Funding Agenc	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	There is a need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to be generated by major developments. The ESFA support the Council's approach to ensure developer contributions address the impacts arising from growth. The ESFA would be particularly interested in responding to any update to the Infrastructure Delivery Plan or review of infrastructure requirements, which will inform any CIL review and/or amendments to the Regulation 123 list. As such, please add the EFA to the database for future CIL consultations.			Officer Comment:	Comments welcome and noted. The EFA will be added to the Local Plan consultation database.
Policy Number:	7	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 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: 3.7 Developer Contributions

Response Number	413	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	7	Map Number:		This policy is closely linked with Policy 6 to ensure adequate infrastructure and mitigation measures are provided for new developments. As previously stated in earlier consultations, viability will remain they key consideration to achieve the correct balance of promoting development and providing a framework to enable and encourage developers to successfully operate in South East Lincolnshire given the characteristics of the area. Chestnut Homes fully appreciates the difficulties and complexities of getting this balance right through its on-going development of The Quadrant Q1, which is delivering a variety of community benefits/infrastructure requirements including the first phase of the Boston Distributor road.	Comments noted.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Soun	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" 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	As promoters of one of the major sites in Boston and with a track record of developing in the area for over 25 years we would like to contribute to any debate on developer contributions/viability								