

**Post Title: 5.0 Introduction**

Response Number: 428 Respondent Number: 2060 Comment Author: Robert Doughty Consultancy Ltd Client: Staples Brothers Web Link:

Paragraph Number: 5 Table/Figure: Comment Content: Officer Comment: Officer Recommendation:

Policy Number: Map Number: Site Allocation Number: The Local Plan has made attempts to provide housing in permanent accommodation, which forms the mainstay of the residential population. The Plan, however, makes little to no effort to address the needs of a more transitory population. In recent years food and agricultural businesses have been dependent on migrant Workers coming into the area, and have had to invest in accommodation to meet this need, with no policy context. Staples Brothers has approximately 150 units to accommodate Workers, which are essential to keep the agri-food businesses, which play such a significant role in the South East Lincolnshire economy, running. Often, although providing temporary accommodation, these developments require significant investment in utilities and infrastructure, which could be considered to be permanent (e.g. Sewage treatment plants). The Objectively Assessed Housing Needs takes account of arising population and economic growth. The identified housing needs also reflect the changes brought about by inward economic migration over the last 10 years or more. It is not clear at this stage whether Brexit will have an affect on either population levels in the future or resultant housing requirements. That specific employers may chose to provide their own housing for their workers is not considered to be inhibited by the Local Plan. 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:

The Evidence Base of the Local Plan needs to be developed to ensure a fuller understanding of the market for temporary accommodation, whether this is provided on site by major employers, or in the form of Houses in Multiple Occupation. Strategic Housing Market Assessments are often challenged by location specific issues, such as migrant Workers, students or even the impact of major armed Services baseS in an area.

The Local Plan should set out an approach to migrant labour, supported with appropriate criteria based policies, and, if necessary, allocations.

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 knowledge and experience in the area are shared and understood.

The Local Plan has made attempts to provide housing in permanent accommodation, which forms the mainstay of the residential population. The Plan, however, makes little to no effort to address the needs of a more transitory population. In recent years food and agricultural businesses have been dependent on migrant Workers coming into the area, and have had to invest in accommodation to meet this need, with no policy context. Staples Brothers has approximately 150 units to accommodate Workers, which are essential to keep the agri-food businesses, which play such a significant role in the South East Lincolnshire economy, running. Often, although providing temporary accommodation, these developments require significant investment in utilities and infrastructure, which could be considered to be permanent (e.g. Sewage treatment plants).

Despite the evidence of significant developments to provide temporary accommodation of this nature, the Local Planning Authority's response to comments made in the January 2016 consultation concluded that the SHMA had not identified a specific issue, and the Local Authority considered that temporary Workers had permanent accommodation within the area and simply moved between jobs. Whereas We accept that some migrant Workers will become established in an area, it is the experience of major employers that many workers come for a short period of time and return to their homes, whether elsewhere in the UK or across Europe, sometimes returning to take up temporary jobs at some time in the future. This flexibility is essential to support the local economy, and will not be met by the supply of temporary works permanently living in the area. Without the supply of labour, businesses will suffer.

Brexit may ensure that temporary Workers are less able to become permanent residents, and the need for temporary accommodation will become more pressing.

No doubt accommodation will always be forthcoming to meet real needs, but without reference in the Plan much of this development may well be unauthorised or in less suitable locations.

The Objectively Assessed Housing Needs takes account of arising population and economic growth. The identified housing needs also reflect the changes brought about by inward economic migration over the last 10 years or more. It is not clear at this stage whether Brexit will have an affect on either population levels in the future or resultant housing requirements.

That specific employers may chose to provide their own housing for their workers is not considered to be inhibited by the Local Plan.

No change to the Local Plan is required.

**Post Title:** 5.1 Meeting Objectively Assessed Housing Needs

<b>Response Number</b>	322	<b>Respondent Number:</b>	2686	<b>Comment Author:</b>	Mr P Carter	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	10	<b>Map Number:</b>		I oppose the Planned Building Application, reference B/16/0436 in the vicinity of Lindis Road, Eastwood Road and Blackthorn Lane in Boston, on the basis that it is not sound. The planned application is not justified, as it was considered using recent past population figures, where there had been a large influx of migrant labour from predominantly Eastern European countries. However, the plan does not consider the likelihood of the population decrease in the Boston area, when such migrant labour moves out of the UK, due to the UK exit from the European Union. Proportionate evidence of migrant labour moving from the local area, and not renewing itself, means that there is no requirement for the housing development B/16/0436 between Lindis Road, Eastwood Road and Blackthorn Lane.	The most recent assessment of the need for new housing in Boston Borough was produced in March 2017, and took account of the most up-to-date information available on all relevant issues (including migration). The Peterborough Housing Market Area & Boston Borough Council Strategic Housing Market Assessment (March 2017) identified that 295 new dwellings would be required in Boston Borough per year between 2011 and 2036. Site Fis001 (which is currently the subject of the planning application referred to by the objector) is one of the Housing Allocations put forward in Boston Borough to meet this need.		No change to the Local Plan is required.		
<b>Site Allocation Number:</b>		<b>Do you consider that this part of the Local Plan is</b>							
<b>Legally Compliant</b>	<input checked="" type="checkbox"/>	<b>Positively Prepared</b>	<input type="checkbox"/>						
<b>Sound</b>	<input type="checkbox"/>	<b>Justified</b>	<input checked="" type="checkbox"/>						
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>	<b>Effective</b>	<input type="checkbox"/>						
		<b>Consistent with national policy</b>	<input type="checkbox"/>						
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									

**Post Title: 5.1 Meeting Objectively Assessed Housing Needs**

Response Number	370	Respondent Number:	2171	Comment Author:	Mrs J Woods	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	I wish to state that I believe the plan to be basically and intrinsically flawed as the Local Plan proposes to build in excess of 11,000 homes over the next 19 years and the current council housing waiting list is less than 300. In my opinion this is a housing plan far in excess of that required in this area.		Officer Comment:	The Objector misunderstands the broad scope and considerations a Local Plan has to fulfill.	
Policy Number:	10	Map Number:						Officer Recommendation:	
Site Allocation Number:								No change to the Local Plan is required.	
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.1 Meeting Objectively Assessed Housing Needs**

Response Number	429	Respondent Number:	2327	Comment Author:	Freeths LLP	Client	Larkfleet Homes	Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	10	Map Number:		Our client OBJECTS to this policy and the Plan as a whole on the basis that the Plan fails to make provision for full objectively assessed housing need ("OAN") for either Boston Borough Council ("BBC") or South Holland District Council ("SHDC"). In addition we submit that the Plan will fail to provide a five year housing supply for BBC and SHDC. We note at paragraph 5.1.2 of the Local Plan that "Where issues of under-delivery may occur that affect the 5 year housing Supply, each Local Planning Authority Will have responsibility for determining how to respond for its own area." Our client's interests lie within BBC and so a detailed analysis of their supply has been undertaken. However, it is apparent from our position on OAN and the approach to dealing with the shortfall for both authorities that these shortcomings would also render SHDC without a five year housing supply. This objection first deals with OAN, with the detailed analysis of this matter contained within a report from the Strategic Planning Research Unit (SPRU) at DLP Planning Ltd, entitled "Report on the Objectively Assessed Housing Need (OAN) in Boston Borough Council and South Holland District Council", which is appended to these representations. [report provided by email] A summary of the position is provided below. Following this, a detailed examination of the five year supply position within BBC is provided, analysing requirement, shortfall, approach to dealing with shortfall, the extent of any buffer, housing trajectory and individual site reviews. In addition, in respect to SHDC the impact of the adjustments to OAN and dealing with shortfall only are provided. OAN Paragraph 47 of the NPPF seeks to boost significantly the supply of housing and in doing so advises that LPA's ensure that their Local Plan meets the full OAN for market and affordable housing in the housing market, subject to being consistent with the policies set out in the Framework. SPRU, having regard for the Local Plan Expert Group ("LPEG") recommended approach and based upon up to date evidence, suggest that OAN for the South East Lincolnshire Local Plan ("SELLP") is in the order of 1364 dwellings per annum for the whole period. This equates to 674 dwellings per annum (dpa) for Boston and 690dpa for South Holland. This results in a significantly higher OAN than is concluded in the respective Strategic Housing Market Assessments (SHMA) for both authorities and has been proposed in the SELLP. The key differences derive from concerns from SPRU that the 10 year migration projections	The Local Plan has been positively prepared and with a sound assessment of housing needs. The delivery of housing needs has also been assessed and evidenced in the proposal of sites.  The 5 year housing land supply is also a responsibility in the preparation of the Plan that has been given considerable consideration.  The PPG does not advocate use of the Sedgefield method per se and the justification for using the Liverpool method, it is understood, is also supported by the Planning Inspectorate.  The increased OAN as put forward by the Objector is not considered to be either justified or deliverable.	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:

It is recommended that the OAN for the Local Plan is revised upwards in accordance with the recommendations of SPRU, specifically to provide a housing requirement for the SELLP of 25,275 dwellings, comprising 12,200 at 488 dpa in Boston and 13,075 at 523 per annum in South Holland. The increase in OAN will necessitate identifying a substantial increase in new sites across both LPAS and a review of the whole strategy.

Participate in Examination:

Why wish to participate

We have a strong objection to key components of the Plan in that the OAN on which the housing strategy is based is flawed and Consequently the Plan fails to be considered sound. We wish to further explain our position at the Examination in Public on matters of OAN and Five Year Housing Supply. These are complex matters, involving numerous assumptions and justification, and it will benefit the EP for these issues to be heard orally, to allow for any questions or points of clarification from the Inspector.

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contained within the SHMA are too low. Consequently this means that the 10 year migration projections used by the SHMA Update 2017 in the assessment of the LPEG methodology result in a lower figure. In addition SPRU report that the SHMA approach to LPEG also omits the consideration of the Rental Affordability Ratio (RAR), which would require a greater increase than the 10% uplift the SHMA uses. The SPRU's approach differs from that commissioned by the SELLP's SHMAs in that: o it incorporates both the underlying population projections and the household formation rates from the most recent household projections (published in 2016) by the Department of Communities and Local Government - these are referred to as the DCLG 2014 household projections. O It takes into account the most recent evidence on migration from the 2015 Mid-Year Estimate (MYE) of population published by the Office for National Statistics (ONS). O It applies the methodology for determining Objectively Assessed Need as set out in the recommendations to the Government for changes to the National Planning Practice Guidance (NPPG) from the Local Plan Expert Group (LPEG) The SPRU sets out the LPEG approach in a range of steps. Firstly, in Output A, the latest DCLG household projections are analysed and this is compared to a projection using the average migration for the last 10 years. This results in a significant uplift in requirement to 490 dpa for Boston and 523 dpa for South Holland (Table 4 and 5 page 39-40) Step B considers the adjustments to reflect issues of affordability and uplifts as a consequence of the RAR are applied to both authorities. This equates to an uplift of 25% for Boston and 20% for South Holland. This increases the figures to 613 dpa for Boston and 627 dpa for South Holland. Boston  $490 + 25\% (122.5) = 613$ . South Holland  $523 + 20\% (104) = 627$ . Output C looks at the total number of dwellings that would need to be provided to meet the level of affordable dwellings. This figure is highly significant in size and results in figures of 1315 dpa for Boston and 952 dpa for South Holland. So as an alternative, through Output D, and by applying the LPEG recommended response in event of Output C being higher than Output B, an uplift of 10% is applied to Output B. This results in 674 dpa for Boston and 690 dpa for South Holland (613 plus 10% for Boston and  $627 + 10\%$  for South Holland) However, given the size of the uplift that is derived from the changes to the 10 year migration trend, SPRU conclude that this satisfactorily addresses the issues raised with regards to market signals and therefore the overall recommendation is that the requirement for the SELLP is: 25,275 dwellings, comprising 12,200 at 488 dpa in

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Boston and 13,075 at 523 per annum in South Holland. Summary on OAN The SELLP proposes OAN of 302 dpa for Boston and 445 dpa for South Holland. This fails to provide an appropriate OAN based on justified evidence. Our position is that the true full OAN is significantly higher at 488 dpa for Boston and 523 dpa for South Holland. The approach of SELLP to the housing requirement evidence base is not sound. As a consequence the approach is contrary to the requirements of paragraphs 14, 17 and 47 of the NPPF. Five Year Housing Supply: The NPPF under paragraph 47 requires LPA's to identify specific deliverable sites sufficient to provide supply of five years of housing against the requirement with an appropriate buffer. The NPPG confirms that LPAs should have such a supply at all points during the plan period. This submission firstly concentrates on the supply position of BBC. However the impacts of the conclusions on OAN and the approach to dealing with shortfall are also provided in respect of SHDC. Boston BC: The key documents for assessing whether BBC will be able to demonstrate a five year supply are the Housing implementation Strategy (March 2017) ("HIS") and the Five Year Housing Supply Assessment (December 2016) ("FYHSA"). The five year supply period in the HIS and FYHSA covers the period from January 2017 to December 2021. However, paragraph 1.0.2 of the Local Plan identifies that the Plan covers the 25-year period from 1 April 2011 to 31 March 2036. The delivery numbers set out in the supporting Settlement Housing Papers are based upon financial years (ie: April-March) and so the figures need to be reconciled to fit the chosen five year period of January 2017 to December 2021. Requirement: The starting point is first establishing the housing requirement. In respect of BBC as reported above their SHMA provides an OAN of 302 dpa. However, our analysis through the report provided by DLP considers that this figure is based on a flawed approach and submits that a robust position which reflects full OAN is 488 dpa. This five year supply analysis sets out the supply projection against both Policy 10 (302 dpa) and our revised OAN figure of 488 dpa, as notwithstanding our strong objection to the current OAN figure, there are other criticisms of assumptions both within the HIS and FYHSA. Shortfall: The extent of the shortfall against the currently proposed OAN of 302dpa is set out in Table 1 of the FYHSA. This details completions against requirement since April 2011 (the start of the plan period) and accounting for 2016/17 being limited to nine months (ie up to 31 December 2016), arrives at a shortfall of 920 dwellings. Based on our revised OAN

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figure of 488 dpa, the extent of the shortfall would be 1989 (488X 5.75- 817 (completions to Dec 2016). Buffer: Paragraph 47 of the NPPF advises that where there is a record of persistent under delivery, LPAs should increase the standard buffer of 5% to 20%. Both LPAs acknowledge that they have a record of persistent under delivery and attribute the 20% buffer to their respective five year supply calculations. The evidence of completions since the start of the Plan period and further back supports this stance. Completions have not met requirements since 2008/09 and the cumulative deficit since this 2009/10 (based on Policy 10 requirement and prior to that Regional Plan requirement) is 1236 dwellings. Approach to the Shortfall: The NPPG states (Paragraph: 035 Reference ID: 3-035-20140306) that the "LPAs should aim to deal with any undersupply within the first five years of the plan period where possible." As the first six years of the plan period has passed and it is within this period that the shortfall has accrued, the appropriate application of the guidance would suggest that the shortfall should be recovered over the next five years. Whilst the FYHSA adopts this approach (paragraph 2.3), the HIS relies on an alternative for both authorities of dealing with the shortfall over the Plan period on an annualised basis, known as the "Liverpool" methodology. Whilst the NPPG does not expressly rule out the Liverpool or indeed any alternative method, it is very clear the LPAs should be aiming to deal with the shortfall in the first five years (the "Sedgefield" methodology) and therefore the justification for any departure from this position should be strongly evidenced. The HIS contains no real justification whatsoever for such a stance other than relying on the "the current relatively low level of housing." This of course is in a climate where no land is allocated for development. However, paragraph 5.1.4 of the Local Plan advises that both authorities have a track record of meeting housing targets through completions over the long term. Taking aside completions over the last few years, the Plan itself goes on to state within the same paragraph that with "more favourable economic conditions and an established, long term, plan led system, the higher housing need figures are not unachievable." The Boston SHMA (2015) at figure 5.18 details completions against housing requirement from 2001/2. Over a ten year period and up to the year before the start of the new Plan period, Boston delivered a total of 3117 dwellings against a cumulative target of 2420 from Structure Plan and Regional Plan requirements. This equates to a positive balance of 697. The period between 2001/2 to 2008/9 was particularly

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fruitful with over provision in seven out of the eight years against the annual target and the significant dip in performance post this period could largely be attributed to the recession. Based on the currently proposed OAN, a 20% buffer and dealing with the shortfall over the next five years, this would derive an annual housing requirement of 583. A higher figure delivery has been previously achieved (2002/3) and the Local Plan should be aspirational in attempting to claw back the shortfall at the earliest opportunity. If this requires further allocation of sites, then this should be factored into the delivery strategy. With the revised OAN, as recommended by SPRU, a 20% buffer and dealing with the shortfall over the next five years, this would derive an annual housing requirement of 1063. Housing Trajectories: The HIS does not provide a housing delivery trajectory for the proposed allocations or sites that are classed as "commitments" (either with permission or a resolution to grant permission). The delivery rates of proposed allocations are contained within the housing papers on a settlement by settlement basis and so make overall analysis extremely difficult. To understand the full picture one would need to review the housing paper for each settlement (across both LPA's this amounts to 30 Housing Papers) and plot the projected trajectory for their delivery. This is not an acceptable presentation of the information and flies in the face of the PPG which advocates a robust approach to 5 supply evidence stating "LPAs will need to provide robust, up to date evidence to support the deliverability of sites ensuring that their judgements on deliverability are clearly and transparently set out." During the course of the Consultation period this information was requested from BBC and was provided but nevertheless a detailed trajectory should as a matter of course form part of the HIS. The housing trajectory shows that neither of the two strategic allocations within BBC will deliver completions within the five year period and this is supported. Sites over 50 dwellings, with the possible exception of one, are not projected to deliver dwellings until 2020/21, which when accounting for aligning the five year period to that of the FYHSA, means completions begin in the last 21 months of the five year period. There is very little information to support the assumptions provided in the trajectories, for example there is no analysis on local delivery rates. Of the 46 sites proposed for allocation which are projected to deliver within the next five years, the HIS reports only three are promoted by housebuilders. Whilst the majority are promoted by landowners, there are number of sites where there is no information on



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whom, if anyone is promoting the site. Overall there is very little evidence to provide reassurance about delivery of sites or the housing numbers of the Plan as a whole. Generally with BBC there is a reliance on smaller sites, with only seven sites exceeding 100 dwellings and these sites providing just 332 dwellings of the 992 projected to be delivered within the five year period. The proposed allocations include 22 sites for development of under 20 dwellings and there is no discount made for non-implementation. Whilst larger sites may in the first instance be slower to deliver, generally they are more reliable in viability terms to meet housing requirements. The reliance on small sites, with no site size threshold, both within proposed allocations and within Commitments poses a significant risk to overall targets not being met through non-implementation. It is therefore suggested that a 10% non-implementation rate should be added into the five year supply calculations. With respect to existing housing commitments, these are projected to deliver 1900 dwellings over the next five years, accounting for 65% of the projected housing supply for this period. The FYHSA, like the HIS, does not provide any detailed trajectories and simply provides a figure that each site will deliver in the next 5 years. With the exception of the strategic sites and one other site (Wyb033) all proposed allocations are proposed to deliver a maximum of 25 dwellings per annum. This appears a realistic delivery rate for the markets conditions in Boston, as with the exception of some affordable housing schemes, very few developments over the past five years have delivered above this rate. In the absence of any other evidence this is an appropriate benchmark for commitments, certainly on the larger sites and is backed up by our client's view of what is reasonable to deliver per annum within this housing market. Of the housing commitments, the FYHSA breaks down the types of site into the following categories. The number of dwellings for each category is shown in brackets: Sites where development has begun (795) Sites with Full Permission (478) Sites with Outline Permission (508) Sites where there is resolution to grant (119) Total: 1900 Our analysis of the sites within the five year supply has been broken down into two exercises. Firstly, We have examined all sites of over 10 dwellings, given that these will significantly contribute to five year supply. This comprised, where appropriate, a detailed review of the permission history, conditions, Section 106 obligations, infrastructure requirements and comparisons with past completion rates. A review of sites under 10 dwellings has also taken place. Given the

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size of these permissions, this amounted to analysing whether permissions had expired and therefore whether they should remain in the supply. Sites of 10+ Dwellings - Following a detailed examination of all sites proposed to deliver 10 dwellings or more over the next five years, there are a number of flawed assumptions. These are presented in Appendix 1 appended to this representation form. This provides thirteen sites where the number of dwellings has either been reduced or removed altogether amounting to a reduction in supply totalling 374 dwellings. The reasons for the altered assumptions are provided in the table, within Appendix 1. Sites of less than 10 Dwellings - These sites have been reviewed as it appears that there are a number of permissions within the five year supply which have expired. These are detailed in Appendix 2 which is appended to this representation form. These total a further reduction in supply of 112 dwellings. Whilst for the sites of 10+ dwellings which potentially have expired we have conducted a search of any revised or renewed permissions, We have not undertaken the same exercise for permissions under 10 dwellings. However it is clear that either the permissions have expired (or have been technically implemented but not delivered any dwellings for a significant number of years) and should not be counted towards supply or the FYHSA does not include the most up to date permissions. Even in a scenario where permissions have been renewed, the absence of any delivery on these sites, taking account of when they first came forward demonstrates that they should not be relied upon as part of the LPA's supply. Furthermore this provides justification for imposing a non-implementation discount. Conclusions on Five Year Supply Having regard for the above assumptions we have set out below the position of BBC's Local Plan five year supply both with an OAN of 302 p/a (as proposed) and based on our revised figure of 488 p/a Scenario 1

OAN of 302 p/a Requirement: 1510 (302 x 5) Shortfall: 920 ("Sedgefield) Buffer: 20% Total Five Year Requirement: 2916 (1510+920+20%) Annual Requirement: 583 Supply: Allocation Sites: 992 Sites with Permission: 1414 (1900-374 (Appendix 1) -112 (Appendix 2) Sub Total: 2406 10% Non Implementation Rate: 240 Total: 2006 2006/583= 3.44 years Scenario 2

OAN of 488 p/a Requirement: 2440 (488 x 5) Shortfall: 1989 ("Sedgefield) Buffer: 20% Total Five Year Requirement: 5315 (2440+1989+20%) Annual Requirement: 1063 Supply Allocation Sites: 992 Sites with Permission: 1414 (1900-374-112) Sub Total: 2406 10% Non Implementation Rate: 240 Total: 2006 2006/1063 = 1.88 years South Holland DC In terms of

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five year supply assessment, the supply of SHDC has not been explored in the detail of BBC. However, in applying the same approach to OAN and dealing with the shortfall, it is clear that SHDC would also not be able to demonstrate a five year supply of housing. Scenario 1 (same OAN but applying Sedgefield approach to shortfall) OAN of 445 p/a Requirement: 2225 (445 x 5) Shortfall: 1166 ("Sedgefield) Buffer: 20% Total Five Year Requirement: 4069 (2225+1166+20%) Annual Requirement: 814 Supply 4658 dwellings (this has not been reviewed)  $4658/814 = 5.72$  years Scenario 2 (update OAN and applying Sedgefield approach to shortfall) OAN of 523 p/a Requirement: 2615 (523 x 5) Shortfall: 1614 ("Sedgefield) Buffer: 20% Total Five Year Requirement: 5075 (2615+1614+20%) Annual Requirement: 1015 Supply 4658 dwellings (this has not been reviewed)  $4658/1015 = 4.59$  years Conclusion: The Local Plan should not be considered sound and fails the tests set out in paragraph 182 of the NPPF. As our evidence demonstrates the Plan has not been prepared on a strategy which meets OAN, with both LPA's under-estimating housing requirement to meet full OAN. The Plan therefore is not positively prepared' and OAN is required to be re-examined to provide a Plan that meets this test. The Plan also fails the justified test as it does not meet OAN or provide a five year housing supply. It is therefore clearly not "the most appropriate strategy' when compared to a Plan that delivers these fundamental requirements. For similar reasons the Plan is also not effective, as it would not deliver the development required over the Plan period. Finally the Plan is not consistent with the national policy in that it fails to deliver sustainable development. The Plan would not address housing needs or significantly boost housing supply and would be contrary to paragraphs 14, 17 and 47 of the Framework.

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Response Number	438	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:	10	Map Number:	
Site Allocation Number:			

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

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:*

Positively Prepared	<input checked="" type="checkbox"/>
Justified	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with national policy	<input checked="" type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

<input checked="" type="checkbox"/>	

The original OAHN calculation was set out in two separate reports namely:- Peterborough sub regional SHMA Update October 2015 by G L Hearn; - Boston Borough SHMA Assessment Final Report July 2015 by JG Consulting. Subsequently this original work is up dated in the Peterborough HMA & Boston BC SHMA Update Final Report dated March 2017 by J G Consulting. The updated Report identifies an OAHN of 7,550 dwellings (302 dwellings per annum) for Boston Borough Council and 11,125 dwellings (445 dwellings per annum) for South Holland District Council for the plan period 2011 2036 which represents an increase from the housing requirement figures set out in the Draft Joint Local Plan. These figures are set out in Policy 10 as a housing requirement of at least 18,675 dwellings (745 dwellings per annum) for South East Lincolnshire and divided between the Council's into individual respective housing requirements. The latest OAHN Calculation is Summarised as :- 2014 Sub National Household Projections (SNHP) multiplied by a vacancy rate of 1.9% in South Holland and 1.6% in Boston equal to 574 dwellings per annum (345 dwellings per annum in South Holland and 229 dwellings per annum in Boston); - 10 year migration trend adjustment to 714 dwellings per annum (433 dwellings per annum in South Holland and 281 dwellings per annum in Boston); - A market signal adjustment to 740 dwellings per annum (445 dwellings per annum in South Holland and 295 dwellings per annum in Boston) because of an increase in concealed households ; - No economic growth led adjustment; - No adjustment to deliver affordable housing needs identified as 282 dwellings per annum in South Holland and 263 dwellings per annum in Boston. As previously commented upon the Councils assessment of OAHN sets out a reasonable demographic starting point of 714 dwellings per annum. However the modest market signal adjustment and no uplifts for economic growth and delivery of affordable housing potentially underestimate housing needs. The HBF disputes comments made by the Councils concerning the extent of the proposed uplifts above demographic starting points. With regard to affordability and worsening market signals it is noted that overcrowding (para 5.31) as well as concealed households (para 5.33) has increased. The house price to income ratio in both authorities is worse than England. Therefore the HBF question if the adjustment of 26 dwellings per annum (equivalent to only 3.6%) is sufficient to address worsening market

The Local Plan has been positively prepared and with a sound assessment of housing needs. The delivery of housing needs has also been assessed and evidenced in the proposal of sites.

The OAN considers uplift in respect of market signals and also in respect of delivering more affordable housing.

The Housing White Paper suggests a number of changes that the plan preparation system may have to take on board but none of these are requirements at the present time.

No change to the Local Plan is required.

**Post Title:** 5.1 Meeting Objectively Assessed Housing Needs

signals. As set out in the NPPG the more significant the affordability constraints then the larger the improvement in affordability needed (ID 2a-020-20140306). It is also noted that forecasted economic growth is particularly strong in South Holland (para 3.22) the lack of any economic growth adjustment should not frustrate future jobs led growth. Although the HBF supports the proposed housing requirement increasing from 696 dwellings per annum proposed in the Preferred Options consultation to 730 dwellings per annum in the Draft Plan to 740 dwellings per annum in the pre submission Plan for the reasons set out above it is evident that 740 dwellings per annum may still underestimate OAHN. The LPEG methodology compliant OAHN [see comments under Policy 15 for more] is higher at 902 dwellings per annum. As highlighted by the recently published Housing White Paper some Councils are not undertaking an honest assessment of housing needs. As a consequence the Housing White Paper proposes a standard methodology for the assessment of housing needs / requirements. The Councils should give consideration to the implications of this proposal. By the time of the South East Lincolnshire Joint Local Plan Examination it may be necessary for the Councils to prepare an assessment of housing needs based on this standard methodology especially given that from April 2018 this may be the baseline against which 5 YHLS and the Housing Delivery Test will be calculated in the absence of an up to date Local Plan (defined as a Plan that is less than 5 years old). If a re-assessment of housing needs using the standard methodology is undertaken the HBF may wish to submit further comments on OAHN and the housing requirement for South East Lincolnshire in Written Hearing Statements and during oral discussions at the Examination Hearing Sessions. It is noted that 5 YHLS will be calculated separately for each authority. The Housing implementation Strategy dated March 2017 includes the Council's latest 5 YHLS calculations. The calculations are based on a Liverpool approach to shortfalls and a 20% buffer. Using this as the basis for 5 YHLS calculation Boston has 6.9 years supply and South Holland has 7.7 years supply. However the HBF's preferences for the calculation of 5 YHLS are the Sedgefield approach to shortfalls as set out in the NPPG (ID 3-035-20140306) with a 20% buffer applied to both the annualised housing requirement and any shortfall. The Councils should provide a re-calculation on this basis. The Councils should be doing everything possible to deliver previous housing shortfalls as soon as possible. This is not just a mathematical calculation but

**Post Title:** 5.1 Meeting Objectively Assessed Housing Needs

represents households in need of housing. It is also suggested that the housing trajectories should be set out in the Joint Local Plan. Under the Housing White Paper a Housing Delivery Test is proposed. On evidence of past completions as set out in the Housing Implementation Strategy dated March 2017 (Table 2) the Councils would fail the Government's proposed Housing Delivery Test. If further site allocations are needed because of an increase in the housing requirement, provision of HLS contingency and / or demonstration of 5 YHLS on adoption then to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. This approach is also advocated in the Housing White Paper because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The Councils should also consider the allocation of developable reserve sites together with an appropriate release mechanism as recommended by the LPEG Report. The LPEG Report proposed that "the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the Whole plan period), plus make provision for, and provide a mechanism for the release of developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF" (para 114 of the LPEG Report). When more information on HLS becomes available the HBF may wish to submit further comments in written Hearing Statements and during oral discussions at the Examination Hearing Sessions.

**Post Title: 5.1 Meeting Objectively Assessed Housing Needs**

Response Number	449	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:	10	Map Number:		Broadgate supports the minimum housing requirement of 18,675 dwellings for the plan period 2011-36 deriving from the OAN requirement. The split between the sub areas of Boston (7,550 dwellings) and South Holland (11,125 dwellings) which informs Policy 2 "Spatial Strategy" is also supported.  It is recognised that these housing targets will require a "step change" in delivery. This is because planned annualised requirements of 300 dwellings per annum in the Boston sub area, and 445 dwellings per annum in the South Holland area, far outstrips recent completions for the latest 5-year monitoring period (2011-16), which average 163 dwellings (Boston) and 280 dwellings (South Holland). This recent track record reinforces the need for the infrastructure delivery concerns raised by Broadgate, as an end user, to be addressed at this stage of the Plans preparation.	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Sound <input checked="" type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> 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: 5.1 Meeting Objectively Assessed Housing Needs**

Response Number	469	Respondent Number:	1825	Comment Author:	Gladman Developments Ltd	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	<p>The SELLP makes provision for a net increase of at least 18,675 dwellings in South East Lincolnshire to meet OAN. Whilst Gladman approve of the decision to increase the housing requirement from 696dpa to 740dpa, the increase does not go far enough to meet South East Lincolnshire's full OAN. The PPG on how plan makers should respond to market signals states, "Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas, and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections... In areas where an upward adjustment is required, plan makers should set this adjustment at a level that is reasonable. The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability need and, therefore, the larger the additional supply response should be. The PPG is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. Gladman consider that it is necessary to increase the housing requirement together with additional housing land and/or a more flexible and permissive approach to development adjacent to settlement limits to ensure full OAN of the HMA are delivered. Furthermore, it must be noted that given the timescales of plan preparation the recently published Housing White Paper proposes a new standardised calculation for assessing housing need. Given the timescales of submitting the Plan for Examination and the start of the EIP, it may be necessary to consider the housing needs in the Context of a standardised methodology. Gladman therefore reserve the right to comment upon any additional housing needs evidence or a re-assessment of housing needs under a standardised methodology.</p>			Officer Comment:	<p>The Local Plan has been positively prepared and with a sound assessment of housing needs. The delivery of housing needs has also been assessed and evidenced in the proposal of sites.</p> <p>The OAN considers uplift in respect of market signals and also in respect of delivering more affordable housing.</p> <p>The Housing White Paper suggests a number of changes that the plan preparation system may have to take on board but none of these are requirements at the present time.</p>	
Policy Number:	10	Map Number:		Officer Recommendation:	<p>No change to the Local Plan is required.</p>					
Site Allocation Number:				<p><b>Do you consider that this part of the Local Plan is</b></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><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" 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: 5.1 Meeting Objectively Assessed Housing Needs**

Response Number	507	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:	
Policy Number:	10	Map Number:		<p>The proposed housing target for South Holland, of 445 dwellings per annum (dpa) is unrealistically low, as it fails to make proper provision for meeting affordable housing need. The 2017 update to the joint Strategic Housing Market Assessment (SHMA) identifies an annual unmet need for 238 affordable dwellings in South Holland. However, the SHMA does not include any significant uplift in the Objectively Assessment Housing requirement (OAN). The SHMA 2017 update suggests that there is not a case for providing an uplift in the housing target, in order to meet the need for affordable housing. We find this very surprising, particularly in the context that the SHMA concludes that there is "a clear need for affordable housing". The housing target is based on projections, which themselves are a reflection of past house building trends. These trends have led to a situation whereby there is a residual annual requirement for 238 affordable homes in South Holland. The SHMA suggests that existing households falling into need do not need to be accommodated, as they are already in accommodation. It also suggests that private rented accommodation is sufficient for many households. This ignores the fact that these households have been identified as being within accommodation which does not meet their needs, and also that they represent an element of unmet demand. It thereby fails to accord with the requirement at paragraph 159 of the NPPF to meet the needs of different households, and to cater for the demand for housing. We believe that it is essential that the OAN figure should be revised to reflect the need to provide sufficient suitable accommodation to meet the whole need and demand for housing identified within the SHMA. Any decision not to do so should be a policy decision, which itself should be taken following the definition of the OAN figure, in accordance with national guidance. At present, it appears that the SHMA has made that policy decision itself, rather than determining a level of housing which would include an uplift to meet the requirement for 238 affordable homes per annum.</p>				<p>The Local Plan has been positively prepared and with a sound assessment of housing needs. The delivery of housing needs has also been assessed and evidenced in the proposal of sites.</p> <p>The OAN considers uplift in respect of market signals and also in respect of delivering more affordable housing.</p> <p>The viability of development in meeting infrastructure and affordable housing needs also has to be considered in terms of the delivery of development. The relationship that the Objector suggests i.e. an uplift in overall housing need targets increases the provision of affordable housing is overly simplified response to a complex problem. Provisions for affordable housing are often cited as unviable by developers.</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>The housing target for South Holland should be reviewed, and a new target derived which incorporates a meaningful uplift to accommodate the need for affordable housing. The proposed housing target should also be Stated as a minimum requirement, to ensure that where there is the potential to meet a higher level of housing need, this can be achieved.</p>									
Participate in Examination:	<input checked="" type="checkbox"/>									
Why wish to participate	<p>Because the issues raised in this representation would be best explained to the Inspector in the format of a round-table discussion.</p>									

**Post Title: 5.1 Meeting Objectively Assessed Housing Needs**

Response Number	530	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:	10	Map Number:		[Appendix E has been provided by email but has not been uploaded due to its size] Policy 10 states that provision will be made for a net increase of at least 18,675 dwellings over the plan period in South East Lincolnshire, equating to: 1. Boston Borough: 7,550 at 300 per annum 2. South Holland: 11,125 at 445 per annum Firstly it is noted that for Boston 7,550 dwellings amounts to 302 dwellings per annum (not 300 as stated in the Policy), as per the requirement set out in the 2015 SHMA. In its current form the Plan is unsound; it is not justified and not effective as it fails to properly interpret the stated outcomes of the evidence base. However, as set out below we have further concerns. As previously noted SPRU has prepared a detailed report on the Objectively Assessed Need for Housing in Boston Borough Council and South Holland District Council and this report should be read alongside this representation. The evidence in this report suggests that the appropriate OAHN for the local plan area should be based upon the SPRU (the most recent) 10 year average migration projections which results in a requirement for 25,275 dwellings in South East Lincolnshire (12,200 dwellings in Boston Borough at 488 dwellings per annum; and 13,075 dwellings in South Holland at 523 per annum). The National Planning Policy Framework requires Local Authorities to ensure that that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47). Each Local Planning Authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local Planning Authorities should ensure that their assessment, of and strategies for, housing take full account of relevant market and economic signals. As such, the requirement for 18,675 dwellings in South East Lincolnshire is an inadequate response to the requirements of the Framework or the PPG. The approach adopted by the Council to determining the housing need in the evidence base of the plan is unsound. It will not assist in meeting the needs of the country as a whole (Framework, paragraph 17) nor is it based on an appropriate evidence base which will deliver a significant uplift in the supply of housing (Framework, paragraph 47).	The Local Plan has been positively prepared and with a sound assessment of housing needs. The delivery of housing needs has also been assessed and evidenced in the proposal of sites.  The OAN considers uplift in respect of market signals and also in respect of delivering more affordable housing.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Soun <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input checked="" type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	The policy should be amended to reflect the findings in the SPRU Report: Provision will be made for a net increase of at least 18,675 dwellings in South East Lincolnshire. By Local Authority area over the Local Plan period (2011-2036) this is: 1. Boston Borough: 12,200 at 448 per annum 2. South Holland: 11,125 at 445 per annum								
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: 5.1 Meeting Objectively Assessed Housing Needs**

Response Number: 531 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: 10 Map Number: Site Allocation Number: [Appendix E has been provided by email but has not been uploaded due to its size] Five Year Land Supply: The Council highlight that the South East Lincolnshire Local Plan defines and works to two separate housing provision targets as both Council's remain separate Local Planning Authorities for development management purposes. Therefore, where issues of under-delivery may occur that affect the 5 year housing land supply, each Local Planning Authority will have responsibility for determining how to respond for its own area. It should be noted, however, that the PPG makes it explicitly clear that where Local Planning Authorities cannot deal with any under-supply within the first 5 years of the plan, they will need to work with neighbouring authorities under the duty to cooperate (paragraph: 035 Reference ID: 3-035-20140306). In this regard, DLP has undertaken a review of Boston Borough Council's land supply position for the period 1st January 2017 31st December 2021 (see Appendix E). The latest position provided by the Council in the Housing Implementation Strategy (March 2017) identifies a 6.9 year supply. However, the Council assessed the five year land supply calculation against an annual housing requirement of only 300 dwellings. Furthermore, in addressing the shortfall (identified to be 920 dwellings), the Council has used the Liverpool approach whereby past shortfall in delivering dwellings is made up over the remaining plan period. The PPG firmly promotes the Sedgefield approach as the most appropriate method, whereby the undersupply is addressed in the first five years of the plan period. No evidence or robust justification is provided as to why the Council has departed from the PPG. Indeed the PPG then goes on to state that where this cannot be met in the first five years, Local Planning Authorities will need to work with neighbouring Authorities under the duty to cooperate (paragraph: 035 Reference ID: 3-035-20140306). There is no reference in the guidance whereby the Liverpool or delayed response approach is considered appropriate to tackle the issue of past undersupply. Thus the choice is therefore not between Sedgefield and Liverpool, but between Sedgefield, and redistributing need to other Authorities where it cannot be met in the first 5 years. DLP has recalculated the Council's five year land supply using the Sedgefield approach based on an annual requirement of 302 dwellings (SHMA 2015). Using this approach the Council can only demonstrate a 4.96 year supply. DLP has also reassessed the Council's five year

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

- Legally Compliant
- Sound
- Prepared in accordance with Duty to Cooperate

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

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

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

The Council will need to allocate further sites in Boston Borough that can be delivered early in the plan period. In this regard, site Fis017a can accommodate 195 dwellings. The site relates well to the existing settlement and can be delivered as a standalone development early within the plan period and would make a contribution to the 5 year housing land supply. Section 4 of the written representation made on behalf of Mr R Hardy and Richard Hardy (Fishtoft) provides further details about the suitability, achievability and deliverability of the site.

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.

The Local Plan has been positively prepared and with a sound assessment of housing needs. The delivery of housing needs has also been assessed and evidenced in the proposal of sites.

The 5 year housing land supply is also a responsibility in the preparation of the Plan that has been given considerable consideration.

The PPG does not advocate use of the Sedgefield method per se and the justification for using the Liverpool method, it is understood, is also supported by the Planning Inspectorate.

The increased OAN as put forward by the Objector is not considered to be either justified or deliverable.

The proposal by the Objector in putting forward a small part of Fis017 is new to the Plan but does not overcome the strategic implications of selecting Fis017 previously considered in preparing the Local Plan or responding to earlier Objections.

No change to the Local Plan is required.

**Post Title:** 5.1 Meeting Objectively Assessed Housing Needs

supply using the SPRU OAHN (488 dwellings per annum) and using the Council's stated supply. Using this approach the Council can only demonstrate a 2.72 years supply. The report also provides an assessment of the projected delivery of the housing allocations identified in Table 3 of the South East Lincolnshire Local Plan 2011-36 Publication Version (March) 2017. The Council anticipate that allocations in the South East Lincolnshire Local Plan will contribute 992 dwellings to the Council's five year housing supply, which we do not consider to be a sound assessment. The report calls into question the capacity of the sites allocated and reassesses the capacity of the sites allocated in Boston Borough based on established gross to net ratios. The assessment found that there will be a total of 63 fewer dwellings delivered in the first five years supply period of 1st January 2017 31st December 2021 than Boston Borough Council anticipate in their Housing Implementation Strategy (March 2017). DLP also apply an allowance for the non-implementation of permissions. The assessment found that on the basis of an adjusted housing requirement to reflect the OAHN for Boston Borough Council (488 dwellings), using the Sedgefield approach, applying an allowance for non-implementation and taking into account gross to net ratio capacities of the allocated sites Boston Borough Council can only demonstrate a housing land supply of 2.56 years. The report found that even if Boston Borough Council's out of date housing requirement of 302 dwellings per annum was used, according to DLP's supply assessment, the Council would still not be able to demonstrate the required five year supply at 4.67 years. As such, DLP consider that Boston Borough Council falls substantially short of demonstrating a five year supply of deliverable housing sites as required by paragraph 47 of the Framework. This would render the Plan un-sound in its current form and it should be substantially modified. If it were to proceed on this basis the housing policies within the Plan would be out of date on the day of its adoption and therefore the plan would not be effective. In order to address this the Council will need to allocate further sites in Boston Borough that can be delivered early in the plan period. In this regard, site Fis017a can accommodate 195 dwellings in total. The site relates well to the existing settlement and can be delivered as a standalone development, early in the plan period and would make a contribution to the 5 year housing land supply. In this regard there is ongoing negotiations with a range of housebuilders who have expressed a strong interest in the site. The development team has already engaged in positive dialogue with the Council regarding

**Post Title:** 5.1 Meeting Objectively Assessed Housing Needs

the land south of Wainfleet Road (12th October 2016).  
Section 4 of this report provides further details about  
the suitability, achievability and deliverability of the site.

**Post Title: 5.2 Distribution of New Housing**

Response Number	240	Respondent Number:	2523	Comment Author:	J Maxey	Client		Web Link	
Paragraph Number:		Table/Figure:	Table 3	Comment Content				Officer Comment:	
Policy Number:	5.2	Map Number:	9	At present the whole proposed allocation for Sutton Bridge in in one ownership which potentially poses delivery risk. Land north of Withington Street and Chestnut Terrace part of which is currently allocated has not been retained in the development area, and could be extended to provide a proportion of the intended growth for the village in a central location. Our previous consultation responses refer. Support was received from a Sutton Bridge Councillor during a recent application for part of the site for a larger and comprehensive scheme for my clients ownership in this area which would provide opportunity for a proportion of the development intended for the village. Flood risk issues have been addressed and The EA are content that Flood Risk assessments recently submitted make development in this area, close to the school and in a central part of the village appropriate	The SHLAA does not identify any deliverability concerns with the Allocated Site – with completions and commitments it will deliver the housing target for Sutton Bridge therefore there is no need to allocate a second site. The site is within Flood Zone 3a, and the majority of the site is within flood hazard in 2115 ‘danger for all’, and flood depth in 2115 ‘1-2m’, one of the most sequentially preferable sites in terms of flood risk in Sutton Bridge. The NPPF, paragraph 101 identifies that the ‘aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The SFRA will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding’. The NPPG adds that the sequential approach ‘is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by sources of flooding where possible.’ The NPPF and NPPG are clear - the Exception Test should not be applied unless the Sequential Test is passed – the findings of the Sequential Test Report identify that, for the appeal site, the Sequential Test has not been passed. Therefore, in these circumstances the Exception Test should not apply.			No change to the Local Plan is required.	
Site Allocation Number:	Sub027								
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Soun <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input checked="" type="checkbox"/> Justified <input checked="" type="checkbox"/> Effective <input checked="" type="checkbox"/> Consistent with national policv <input type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Reduce the number of dwellings proposed south of Bridge Road and allocated land north of Chestnut Terrace and Withington Street, as per previous representations at earlier stages of the plan for residential development within the village target allocation								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	The ensure that the merits of the alternative sites, and the risk to delivery of all allocation being within one ownership are fully considered								

**Post Title:** 5.2 Distribution of New Housing

<b>Response Number:</b>	249	<b>Respondent Number:</b>	878	<b>Comment Author:</b>	Matrix Planning Ltd.	<b>Client:</b>		<b>Web Link:</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content:</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	11	<b>Map Number:</b>		The text is unclear and imprecise and there is no punchline in Policy 11 . Whilst paragraph 5.2.5 encourages small housebuilders with infill development, there are no clear policies that allow this. The allowance for infill housing development is only implied by the polices, yet should be clearly more stated in Policy to avoid uncertainty.	Policy 11 cannot be viewed in isolation to other Policies in the Local Plan or the Inset Maps for particular settlements. In particular Policy 2 sets out that development within settlement boundaries will be permitted, Policy 3 sets out the Development Management considerations. These policies are positively worded. Paragraph 5.2.5 does not require amendment to include reference to Minor Service Centres as it is clear that these are included in Policy 11.	No change to the Local Plan is required.			
<b>Site Allocation Number:</b>									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
<b>Legally Compliant</b>	<input checked="" type="checkbox"/>	<b>Positively Prepared</b>	<input type="checkbox"/>						
<b>Soun</b>	<input type="checkbox"/>	<b>Justified</b>	<input type="checkbox"/>						
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>	<b>Effective</b>	<input checked="" type="checkbox"/>						
		<b>Consistent with national policy</b>	<input type="checkbox"/>						
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>	Line 3 of 5.2.5 is incomplete and should read within the Minor Service Centres and Other Service Centres?Add additional lines to the Policy to make the meaning of paragraph 5.2.5 clear.								
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									

**Post Title: 5.2 Distribution of New Housing**

Response Number	316	Respondent Number:	1689	Comment Author:	Environment Agency	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	11	Map Number:		The Environment Agency has worked closely with the Joint Planning Unit (JPU) in considering the flood risk Sequential Test for site allocations. The JPU has applied the test in line with the National Planning Practice Guidance in order to steer new development to area at lowest risk of flooding. This is demonstrated through the Sequential Test document, and/alongside the Sustainability Appraisal. The information on the level of flood risk to sites is recorded in the SHLAA and has also been integral to selecting sites, as recorded in the Housing Papers. The Environment Agency has also provided advice on the level of mitigation that will be required for the allocated sites to enable them to pass the flood risk Exception Test. The level of mitigation required for particular flood depths is contained in Appendix C of the South East Lincolnshire Strategic Flood Risk Assessment and has been fed into the site selection process through Environment Agency representations. 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). It is our experience that mitigating risk where predicted depths on site could be in excess of 1 metre becomes problematic. There are sites proposed for allocation in Boston where depths are predicted to be over 1 metre, namely: Fen001, Fen002, Fis001, Fis003, Fis033, Sou006, Wes001, Wes002, Wyb013, Wyb033 and also Butterwick, namely But020. Mitigation measures, such as the need to significantly raise finished floor levels, will influence the design of housing and could impact on the amenity/visual impact of 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. The Environment Agency supports these allocations on the understanding that (and the assurance of this having been received from the JPU) the flood risk to them, as identified in the South East Lincolnshire Strategic Flood Risk Assessment, will be adequately mitigated to ensure that the sites comply with the requirements of Paragraph 102 of the National Planning Policy Framework, i.e. Development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will	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:

n/a

Participate in Examination:

Why wish to participate



**Post Title:** 5.2 Distribution of New Housing

reduce flood risk overall

<b>Response Number:</b>	346	<b>Respondent Number:</b>	2509	<b>Comment Author:</b>	Rollinson Planning Consultancy	<b>Client:</b>		<b>Web Link:</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content:</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	11	<b>Map Number:</b>	10	Re: Woods Nurseries, Tarry Hill, Swineshead Given the importance of the settlement and its sustainability credentials, coupled with the explicitly acknowledgement that it is the only sizeable settlement in Boston Borough where significant areas of land at low risk or no risk from flooding are available, we remain of the view that the housing numbers for Swineshead (as set out within proposed Policy 11) should be increased and the Woods Nurseries site allocated for housing development.	It is not agreed that Policy 11 should be amended to increase Swineshead's housing requirement. Four hundred dwellings is considered to be the appropriate number, taking account of: the findings of the South East Lincolnshire Assessment of Settlements and their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding.		No change to the Local Plan is required.		
<b>Site Allocation Number:</b>		<b>Do you consider that this part of the Local Plan is</b>							
<b>Legally Compliant</b>	<input type="checkbox"/>	<b>Do you consider that the Local Plan is unsound because it is not:</b>		<b>Positively Prepared</b>	<input checked="" type="checkbox"/>				
<b>Sound</b>	<input type="checkbox"/>			<b>Justified</b>	<input checked="" type="checkbox"/>				
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>			<b>Effective</b>	<input checked="" type="checkbox"/>				
				<b>Consistent with national policy</b>	<input checked="" type="checkbox"/>				
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									

## Post Title: 5.2 Distribution of New Housing

Response Number	357	Respondent Number:	1689	Comment Author:	Environment Agency	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:	
Policy Number:	11	Map Number:		<p>The Environment Agency has concerns regarding the proposal to allocate 120 houses to the settlement of Gedney Hill as there is currently no mains system for the treatment/disposal of foul sewage under the jurisdiction of Anglian Water Services (AWS). The District Council is the permit holder for 4 permitted discharges in the settlement. Based on the limited information we have available regarding these permit discharges, we believe that there is not sufficient capacity available to accommodate effluent from an additional 120 dwellings. This issue has been discussed with the Council and AWS during recent months and two alternatives have been muted as possible solutions to this issue.</p> <p>The first was for an application under Section 101A of the Water Industry Act (1991) to be submitted to AWS for the provision of a first time sewage system. The purpose of such an application would be primarily to rectify issues with an existing drainage system, which was giving rise to adverse effects on the environment. However, were such an application to be successful and infrastructure provided, subsequent new development would have a right to connect to this infrastructure. Subsequently, an application for this was made to AWS but was not accepted it was deemed there was insufficient evidence that the existing system was giving or is likely to give rise to adverse effects on the environment to justify the application. The second proposed solution is for the landowner/developer to provide a private network and treatment facility that AWS is then prepared to adopt. At the current time we are not aware of how the landowners/developers propose to deal with the issue of foul water disposal. If neither of the above options prove to be feasible we would not wish to see the proliferation of further private treatment plants in the area to serve new development as we do not consider these to be environmentally sustainable solutions. Discharges from wastewater treatment plants owned and operated by sewerage undertakers are significantly less likely to cause pollution than discharges from private plants treating domestic sewage. This is because discharges from public sewerage systems are much more likely to meet the standards set in their environmental permit as a result of effluent receiving more comprehensive and reliable treatment. The Environment Agency cannot provide any assurance that applications to permit/operate privately owned</p>	<p>The Environment Agency's (EA) comments are acknowledged.</p> <p>The respondent for Geh003 in the January 2016 and July 2016 consultations has indicated that a planning agent has been engaged and developers are interested. Geh015 was submitted as part of the January 2016 consultation. The respondent for Geh015 in July 2016 advised a preapplication advice proposal would be submitted. It was and the Council advised it needed to be developed in accordance with Geh003. The respondent's comments supported Geh004 in January 2016. In July 2016 the comments were in relation to a larger site, which was not put forward in the publication version. Instead Geh004 was put forward so that Geh015 could be included. They have not objected to the smaller Geh004 site in this consultation.</p> <p>There is a known sewerage disposal issue in Gedney Hill. A Section 101A application to Anglian Water (AW) to provide a scheme for existing properties. This would not be before 2020 as the AW sewerage works scheme is fully committed until then. This response from the EA was the first time we were aware that such a proposal had been made, and rejected. AW have advised that it was made by the Parish Council and their rejection is based on the application and their own investigations. There is a right of appeal to the EA. There is then the opportunity for this site to connect to and augment the new sewerage works.</p> <p>The second option is for the sites to provide their own sewerage scheme, which is also suitable for Anglian Water's requirements so it can be used as a basis for a scheme for the village. It is acknowledged that there are many unknowns at this stage, such as: where it will go, land ownership for its site and the pipe runs to the development, viability and whether the costs are such that the price the developer is prepared to pay is sufficient for the land owners to sell. However, without land being allocated there is no impetus for this issue to be resolved.</p> <p>If the sites are all deallocated and the village is left with a Settlement Boundary, infill would still be acceptable, but would no doubt have individual septic tanks or small scale package treatment works. From the EA's</p>				<p>Further consideration of this matter will be necessary as part of the Examination.</p>	
Site Allocation Number:	Geh003;									
<p><b>Do you consider that this part of the Local Plan is</b></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><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" 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:	<p>Site allocations in Gedney Hill should be removed unless it is demonstrated that environmentally sustainable foul water infrastructure can be provided prior to development coming forward.</p>									
Participate in Examination:	<input checked="" type="checkbox"/>									
Why wish to participate	<p>The Environment Agency does not believe it is essential to participate in the oral Examination but will attend to provide assistance/further information to the Inspector should this be required.</p>									

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treatment plants to serve new development will be granted. As recommended in the Infrastructure Delivery Plan 2016 (paragraph 12.7.5), further information from developers should be sought in order to fully understand how sewage infrastructure will be provided before these sites are allocated.

comments this is unlikely to be acceptable, and so deallocating the sites will not overcome the EA's concerns. Resolving the sewerage issue provides an overall more sustainable solution, that also permits the opportunity for further development in later local plans.

It is considered that the site should remain in order for the land owners to provide evidence to the examination that the sewerage issue can be resolved.

In addition Table 3 in section 5.2 could be amended to list this constraint. This would however, require all sites to be similarly considered to produce a full list, as omissions could allow an unfortunate decision elsewhere.

<b>Response Number</b>	372	<b>Respondent Number:</b>	2812	<b>Comment Author:</b>	Ms V Fear	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>		<b>Officer Comment:</b>		<b>Officer Recommendation:</b>	
<b>Policy Number:</b>	11	<b>Map Number:</b>		I do not believe that Fleet is suitable for development because it is unsustainable. There is no shop within easy walking distance and the school, I understand, is over subscribed with no suitable parking. Eastgate is also home to a haulage company and a plant firm, which operate from two sites in this area.		The number of dwellings in Fleet has been reduced from 150 to 70 owing to a site having Conservation Area and Listed Building impacts. The Post Office and Village Store has moved recently to Gedney.		No change to the Local Plan is required.	
<b>Site Allocation Number:</b>						The County Education Department has commented that Fleet Hargate has sufficient primary school capacity available for developments proposed. The closest secondary is University Academy Holbeach which currently has no available capacity. An additional 300 spaces is required for developments proposed. The closest sixth form is University Academy Holbeach - Sixth form capacity echoes capacity in the secondary schools which they are part of (no capacity available).			
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" type="checkbox"/>							
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									

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<b>Response Number</b>	392	<b>Respondent Number:</b>	2060	<b>Comment Author:</b>	Robert Doughty Consultancy Ltd	<b>Client</b>	Lincolnshire County Council	<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	11	<b>Map Number:</b>		We support Policy 11 as it relates to Holbeach, specifically site HOB048. A planning application for HOB048 has been prepared and considered by the Local Planning Authority that is minded to approve the application. HOB048 is also subject to a specific policy in the plan, reflecting its importance as a Sustainable Urban Extension to Holbeach. The site is also well placed adjacent to the ongoing Peppermint Junction Improvement works (a scheme which also provides a new dedicated access point to the allocation). The housing site also provides a link to the proposed allocation of the Food Enterprise Zone (FEZ) to the west of the A151, a project that is also accessed via the Peppermint Junction scheme. The FEZ scheme would be separated from Holbeach without the residential development. A Local Development Order is also being prepared for the FEZ.	Support for Hob048 is noted. The LPA agrees with all of the points raised, although the planning application has been approved subject to the completion of a s106 agreement.		No change to the Local Plan is required.		
<b>Site Allocation Number:</b>									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
<b>Legally Compliant</b>	<input checked="" type="checkbox"/>	<b>Positively Prepared</b>	<input type="checkbox"/>						
<b>Sound</b>	<input checked="" type="checkbox"/>	<b>Justified</b>	<input type="checkbox"/>						
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>	<b>Effective</b>	<input type="checkbox"/>						
		<b>Consistent with national policy</b>	<input type="checkbox"/>						
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input checked="" type="checkbox"/>								
<b>Why wish to participate</b>									

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Response Number	398	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:	11	Map Number:		We support Policy 11 as it relates to Holbeach, specifically site HOB048. A planning application for HOB048 has been prepared and considered by the Local Planning Authority that is minded to approve the application. HOB048 is also subject to a specific policy in the plan, reflecting its importance as a Sustainable Urban Extension to Holbeach. The site is also well placed adjacent to the ongoing Peppermint Junction Improvement works (a scheme which also provides a new dedicated access point to the allocation). The housing site also provides a link to the proposed allocation of the Food Enterprise Zone (FEZ) to the west of the A151, a project that is also accessed via the Peppermint Junction scheme. The FEZ scheme would be separated from Holbeach without the residential development. A Local Development Order is also being prepared for the FEZ.	Support for Hob048 is noted. The LPA agrees with all of the points raised, although the planning application has been approved subject to the completion of a s106 agreement.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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.								

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Response Number	411	Respondent Number:	2060	Comment Author:	Robert Doughty Consultancy Ltd	Client	Bovis Homes Limited	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	We support Policy 11 as it relates to Holbeach, specifically site HOB048. A planning application for HOB048 has been prepared and considered by the Local Planning Authority that is minded to approve the application. HOB048 is also subject to a specific policy in the plan, reflecting its importance as a Sustainable Urban Extension to Holbeach. The site is also well placed adjacent to the ongoing Peppermint Junction Improvement works (a scheme which also provides a new dedicated access point to the allocation). The housing site also provides a link to the proposed allocation of the Food Enterprise Zone (FEZ) to the west of the A151, a project that is also accessed via the Peppermint Junction scheme. The FEZ scheme would be separated from Holbeach without the residential development. A Local Development Order is also being prepared for the FEZ.			Officer Comment:	Support for Hob048 is noted. The LPA agrees with all of the points raised, although the planning application has been approved subject to the completion of a s106 agreement.
Policy Number:	11	Map Number:		Officer Recommendation:	No change to the Local Plan is required.				
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Sound <input checked="" type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> 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 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.								

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<b>Response Number</b>	423	<b>Respondent Number:</b>	1843	<b>Comment Author:</b>	Neil Kempster	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>			<b>Officer Comment:</b>	<b>Officer Recommendation:</b>	
<b>Policy Number:</b>	11	<b>Map Number:</b>	1	<p>We fully support the emphasis of new development on the Sub-Regional Centres and in particular the concentration of development within Boston Borough on the urban area of Boston. This is entirely consistent with the sustainability principles at the heart of NPPF, as well as enabling the Local Plan to maximise the opportunities to deliver the strategic infrastructure priorities it has identified.</p> <p>In this regard, the identification of the Sou006 Land South of Chain Bridge Road which forms part of The Quadrant development, Q2 is fully supported. The site has the capacity to deliver, as a minimum, the 1500 homes stated, as well as the other employment and commercial land, local retail uses and marina identified as part of this large mixed use development. Q2 is a logical extension to the Q1 development which will help to deliver the next phase of the Boston Distributor road. The partnership approach adopted on the successful delivery of Q1 can be extended to work together to bring forward this next phase of strategic development for Boston. No other site in the Boston area can deliver the same outputs as Q2 in terms of housing and economic growth, together with contributions to strategic priorities such as the Fens Waterways Project and Boston Transport Strategy.</p>	<p>The support for Policy 11's provisions for Boston is welcomed.</p> <p>The support for the identification of site Sou006 as a Housing Allocation is welcomed.</p>		<p>No change to the Local Plan is required.</p>		
<b>Site Allocation Number:</b>	Sou 006								
<p><b>Do you consider that this part of the Local Plan is</b></p> <p><b>Legally Compliant</b> <input checked="" type="checkbox"/></p> <p><b>Sound</b> <input checked="" type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p><b>Positively Prepared</b> <input type="checkbox"/></p> <p><b>Justified</b> <input type="checkbox"/></p> <p><b>Effective</b> <input type="checkbox"/></p> <p><b>Consistent with national policy</b> <input type="checkbox"/></p>							
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>	As promoters of one of the key strategic allocated sites in the Boston area we would welcome the opportunity to be included in any debate on the distribution of new housing.								

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<b>Response Number</b>	430	<b>Respondent Number:</b>	2327	<b>Comment Author:</b>	Freeths LLP	<b>Client</b>	Larkfleet Homes	<b>Web Link</b>		
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>			
<b>Policy Number:</b>	11	<b>Map Number:</b>		<p>Our client OBJECTS to this policy and the Plan as a whole. There are several areas of objection. The first part of the objection is on the basis that the Plan fails to adequately cater for OAN (as evidenced on separate representations for Policy 10) and consequently the distribution of development for each settlement will need to be increased to meet a more robust OAN. Our objection concentrates on matters relating to Boston Borough Council ("BBC") only. Notwithstanding the OAN related objection we also submit the distribution of development should be amended to increase the amount of development within Kirton. The final element to the objection under this policy is to the proposed allocations of sites Kir016, Kir034 and Kir041. Distribution of Development: The proposed distribution of development is based upon an overall requirement of 7550 dwellings across the Plan period (OAN of 302dpa). Our objection to Policy 10 projects that for BBC a full OAN would equate to 488 dpa and an overall requirement of 12,200 dwellings. If the distribution of development were to remain as proposed and settlement requirements were increased on a proportionate basis, then the resulting increase would have the following consequential increases for the Sub-Regional Centre (Boston) and the Main Service Centre's of Kirton, Swineshead and Sutterton: Boston 9516, Kirton 805, Swineshead 647, Sutterton 475. It is recognised that this is a rudimentary approach to dealing with the increased OAN and that any increases would need to be considered in accordance with sustainability objectives. However, it is a guide as to the potential increases that would be required for the key settlements. Notwithstanding our proposed OAN objection we submit that the amount of development proposed for Kirton should be increased and that this should be at the expense of a lower amount within Boston. At 5900 dwellings, Boston is proposed to accommodate 78% of the Plan requirement. Whilst clearly out on its own in Sustainability terms as the principal settlement, it is highly constrained by flooding and there remains significant concerns regarding the viability of delivering the level of development proposed within Boston. In respect to flood risk, we submit that firstly the methodology undertaken for the sequential test is flawed and we have made separate representations on this matter. In short the application of the sequential test is contrary to the PPG (paragraph 020) in not applying the test to the whole LPA area and</p>	<p>The Objectors comments with regard to the OAN and approach taken on the Flood Risk have been dealt with elsewhere.</p> <p>As the Objector notes the consequence of increasing the OAN for Boston Borough to 488 pa has undergone no assessments for sustainability. They also indicate that their suggested redistribution is rudimentary. It also appears to be somewhat confused particularly in respect of Kirton where they object to the proposals for the allocated sites in favour of their own yet suggest that Kirton's identified need should be some 300 higher than the Local Plan proposes. As the Local Plan also assesses the allocated sites are also better in terms of flood risk than the Objector's. This would also run contrary to their case.</p> <p>Site Allocations - The objector suggest that the reduction in size of the previous allocation (site Kir037) and division into three separate elements is a response to their argument that site Fra024 is more attractive in delivery terms. This is not the case. These changes were, in fact, made as a consequence of the landowners of part of site Kir037 indicating that their land would not be available for development.</p> <p>The objector is correct that sites Kir034 and Kir041 are not being promoted by housebuilders, and it is accepted that (because site Fra024 is being promoted by a housebuilder) there are fewer potential obstacles to its delivery than is the case for sites Kir034 and Kir041. However, there is no evidence to suggest that sites Kir034 and Kir041 are unlikely to be delivered in a timely fashion. Furthermore, there are four 'Housing Commitments' in the village and thus, there is no shortage of deliverable housing sites in the village.</p> <p>The objector does not touch upon flood risk, which was the fundamental reason why sites Kir016, Kir034 and Kir041 were chosen as Housing Allocations in preference to site Fra024. Whilst the Environment Agency's Flood Map shows all four sites as being located within Flood Zone 3a, the South East Lincolnshire Strategic Flood Risk Assessment (March 2017) shows sites Kir016, Kir034 and Kir041 as sequentially preferable to site Fra024 in terms of flood hazard and flood depth in 2115.</p>		<p>No change to the Local Plan is required.</p>			
<b>Site Allocation Number:</b>										
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>								
<b>Legally Compliant</b>	<input type="checkbox"/>	<b>Positively Prepared</b>	<input checked="" type="checkbox"/>							
<b>Sound</b>	<input type="checkbox"/>	<b>Justified</b>	<input checked="" type="checkbox"/>							
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>	<b>Effective</b>	<input checked="" type="checkbox"/>							
<b>Consistent with national policy</b>	<input checked="" type="checkbox"/>									
<b>Compliant, Sound, Duty to Cooperate explanation:</b>										
<b>Proposed changes to make compliant or sound:</b>	<p>The consequence of our objections to OAN (under Policy 10) is that a review of the whole strategy is required. As part of such a review, it is submitted that the distribution between settlements is re-evaluated and that to reduce reliance on Boston itself, Kirton's proposed housing figures should be increased. Furthermore we recommend that site is Fra024 is allocated for residential development.</p>									
<b>Participate in Examination:</b>	<input checked="" type="checkbox"/>									
<b>Why wish to participate</b>	<p>We have a strong objection to key components of the Plan in that the OAN on which the housing strategy is based is flawed and Consequently the Plan fails to be considered sound. We wish to further explain our position at the Examination in Public on matters of OAN, Five Year Housing Supply and distribution of development. These are complex matters, involving numerous assumptions and justification, and it will benefit the EP for these issues to be heard orally, to allow for any questions or points of clarification from the Inspector.</p>									



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applying it on a settlement by Settlement basis. In relation to Boston there are 10 allocations which sit Within Flood Zone 3 and the 'danger for all hazard rating. This totals some 3,415 dwellings and 45% of the total proposed housing requirement. Solutions within other settlements have not been appropriately explored and development can be accommodated in Kirton on sites with a lesser flood risk. Clearly some development in Boston will need to be accommodated in the Worst hazard rating areas, but the balance as proposed is not appropriate. There is also significant concern regarding the deliverability of the amount of development proposed in Boston. The number of sites allocated within Boston within the SELLP over 30 dwellings is 14. There is a further 10 sites within the five year supply which are over 30 dwellings. The South East Lincolnshire Whole Viability Study at paragraph 6.4.5 confirms that there are only a handful of developers operating in South East Lincolnshire who are local to the area and understand the market and development issues very well. The Study also advises that there is very limited representation by national housebuilders in the area. With such a reliance on Boston, and sites within very close proximity to each other, it appears very questionable as to Whether there will be sufficient developer interest to deliver such a high level of development. It is notable that with the exception of the two strategic sites and one other proposed allocation, none of the proposed allocated sites in Boston are promoted by housebuilders. By comparison, Kirton has benefited from a good record of completions and commitments over recent years. Boston 2800, Kirton 394, Swineshead 115, Sutterton 77. Far from being justification to limit further development in Kirton, the Local Plan should respond to the market attractiveness of Kirton and its place as clear second most sustainable settlement in the Borough. The allocation of a further 250-300 dwellings within Kirton (not accounting for increased OAN) would increase housing delivery and Would help attract further services and facilities, maintaining the enhancing the viability and vitality of the settlement.

Site Allocations: Notwithstanding our representations on OAN or the number of dwellings allocated for Kirton, We OBJECT to the allocation of Kir016, Kir034 and Kir041. At the preferred allocations stage, we submitted an objection against Kir037 on behalf of our client, who also submitted a separate objection. Kir037 has been reduced in size and separated into three individual allocations, known as Kir016 (25 dwellings), Kir034 (41

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dwelling) and Kir041 (102 dwellings). This objection remains and we maintain our stance that Fra024 would represent a more justified allocation. The reduction in size of the previous allocation and division into three separate elements is perhaps a response to the justified position presented at the preferred options stage Consultation, that Fra024 is significantly more attractive in delivery terms. However, this amendment appears a rather convoluted approach to housing delivery for the settlement. Breaking up the allocations into smaller sites reduces the number of landowners per site, but may well not address the deliverability issues. Whilst the smallest of the three sites is promoted by a housebuilder, the other two sites do not appear to have any developer support. Deliverability is one of the greatest challenges for the SELLP and in this context we retain the firm view that Fra024 represents a more justified allocation for Kirton. Site Fra024: We maintain our SUPPORT for site Fra024. The site is subject to a planning appeal against the refusal of permission for a scheme of 215 dwellings (B/16/0380) and a revised application has recently been submitted for 195 dwellings. There is no dispute that the site is within a sustainable location and there are no outstanding technical objections to accommodating development on the site. The single remaining reason for refusal on the appeal scheme is the impact of the proposal on the open countryside and landscape. This reason is considered unjustified. The additional detail submitted as part of the masterplan for the revised application demonstrates how development can be adequately absorbed into the landscape and will equally be demonstrated with the appeal scheme. The site is within single ownership, promoted by a housebuilder and there are no barriers to delivery associated with the development of this site.

Conclusion The Local Plan should not be considered sound and fails the tests set out in paragraph 182 of the NPPF. As our evidence demonstrates the Plan has not been prepared on a strategy which meets OAN. The Plan therefore is not 'positively prepared' and OAN is required to be re-examined to provide a Plan that meets this test. This has a consequential impact upon Policy 11 and the numbers required for each settlement. In addition we submit that there remains an over-reliance on Boston for development and that an uplift to the figures for Kirton Would be appropriate. It is not considered that the Plan is justified, as it does not represent the most appropriate strategy. We also have raised significant concerns that the Plan meets the

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'effective' test, in regards to both the OAN issue and the viability of reliance on sites in Boston. Finally the Plan is not consistent with the national policy in that it fails to deliver sustainable development. The Plan would not address housing needs or significantly boost housing supply and would be contrary to paragraphs 14, 17 and 47 of the Framework.

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Response Number	439	Respondent Number:	1207	Comment Author:	Home Builders Federation Ltd	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:			Officer Recommendation:	
Policy Number:	11	Map Number:		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 distribution of housing should meet the housing needs of both urban and rural Communities. The HBF do not comment on the merits or otherwise of individual sites therefore our representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall HLS, 5 YHLS and housing trajectories. However it is essential that the Councils assumptions on lead-in times, lapse rates and delivery rates for sites are realistic. These assumptions should be supported by parties responsible for delivery of housing and sense checked by the Councils using historical empirical data and local knowledge. The proposed overall HLS is 18,625 dwellings which is 50 dwellings less than the housing requirement. Therefore there is no contingency in the proposed HLS. Since the proposed housing requirement is a minimum figure it should not be treated as a maximum ceiling to restrict overall HLS and prevent sustainable development from coming forward. The Councils are referred to the DCLG presentation slide from the HBF Planning Conference September 2015 (see below)[provided by email]. This slide illustrates 10 - 20% non-implementation gap together with 15 - 20% lapse rate. The slide also suggests "the need to plan for permissions on more units than the housing start / completions ambition". It is acknowledged that this presentation slide shows generic percentages across England but it provides an indication of the level of flexibility within the overall HLS that the Councils should be providing.	The Local Plan seeks to provide a broad range of sites and development opportunities. Boston and Spalding are the sub-regional centres where the highest levels of housing need arise and the greatest range of services exist are that are capable of being extended.			No change to the Local Plan is required.	
Site Allocation Number:					The sites put forward throughout the plan area have indicative capacities based upon fairly conservative assessments of density (e.g. 20 per ha in the rural settlements (including Holbeach) and Boston and Spalding 30 per ha) and this is to show that housing needs can be met purely through the proposed allocations.			Within settlement boundaries many infill and windfall sites may come forward and Policy 16: Rural Exceptions Sites can meet further needs which might arise.	
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Soun <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input checked="" 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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.2 Distribution of New Housing**

Response Number	444	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:	11	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. My client was also pleased to note the further confirmation of the above in the Housing Paper for Crowland that the housing target for each settlement are minimum figures and so there is Scope to exceed these should there be good planning reasons to do so.	Comments noted.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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:									
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate									

**Post Title: 5.2 Distribution of New Housing**

Response Number	450	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:	11	Map Number:		Broadgate support the overall level of development proposed for Spalding under Policy 11 Distribution of New Housing which amounts to a housing target of a minimum of 5,255 dwellings (2011-2036) derived by applying an average density of 30 dwellings per hectare to the gross areas of the allocated sites.  Broadgate support the quantum of housing that is directed to Boston comprising 5900 dwellings under Policy 11 Distribution of New Housing'. The supporting allocation table at paragraph 5.2.9 specifically allocates Broadgate's Land South of North Forty Foot Bank Ref Wes02 (which amounts to an area of 46.43 ha) for up to 1138 dwellings. This allocation is Supported.	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Sound <input checked="" type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> 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: 5.2 Distribution of New Housing**

Response Number	470	Respondent Number:	1825	Comment Author:	Gladman Developments Ltd	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:
Policy Number:	11	Map Number:		<p>The SELLP seeks to distribute significant growth primarily to the sub-regional centres of Boston and Spalding with the Main Service Centres and Minor Service Centres. As previously highlighted, Gladman generally support the distribution of growth towards a range of settlements however we feel that the Plan continues to place a significant reliance on the delivery of Sustainable Urban Extensions (SUEs) to deliver significant housing numbers. With this in mind the Local Plan faces the potential risk of failure due to the complex nature of bringing such proposals forward ie, lead in times, infrastructure requirements etc. It is therefore strongly advisable that the Council take a positive and more proactive approach in allocating a variety of additional sustainable sites that are capable of complementing the SUEs should under delivery occur. South East Lincolnshire benefits from having a number of sustainable settlements within its boundary that are capable of accommodating further housing growth necessary to assist in delivering full OAN. Gladman are concerned that Policy 11 may imply that the apportioned growth to each settlement is considered a 'maxima' that could be considered as a target to be achieved. Instead, this policy should refer to "minimum housing numbers for each settlement to be consistent with Policy 10 which seeks to deliver 'at least 18,675 dwellings over the plan period.</p>	<p>The Local Plan seeks to provide a broad range of sites and development opportunities. It is acknowledged that SUE's do play an important role in delivering housing needs and this is a consequence of several factors; the assessment of the need for new highway infrastructure and the opportunities the SUE's present, also, that the two main urban areas and Holbeach are very compact in form with few potential sites of significant scale appropriate for development. Therefore extensions to the urban areas and Holbeach to meet housing needs is a consequence. That the sites proposed are in a limited number of ownerships is considered to be a major advantage.</p> <p>The sites put forward throughout the plan area have indicative capacities based upon fairly conservative assessments of density (e.g. 20 per ha in the rural settlements (including Holbeach) and Boston and Spalding 30 per ha) and this is to show that housing needs can be met purely through the proposed allocations.</p> <p>Within settlement boundaries amny infill and windfall sites may come forward and Policy 16: Rural Exceptions Sites can meet further needs which might arise.</p>				<p>No change to the Local Plan is required.</p>
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" 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: 5.2 Distribution of New Housing**

Response Number	471	Respondent Number:	1825	Comment Author:	Gladman Developments Ltd	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:		Map Number:		The provision of affordable housing should be one of the main priorities that the Committee seek to address through its Local Plan. However, the only way to improve affordability is to provide new housing. If the evidence suggests that a certain level of affordable housing is required and the authority is not seeking to address that need in full through its local plan, then the only possible result is that the affordability gap will get worse. The PPG sets out how an increase in the total housing figures included in the Local Plan should be considered where it could help to deliver the required number of affordable homes. In this regard, whilst it is recognised that meeting the full need for affordable housing within South East Lincolnshire would require a housing target above that currently proposed, Policy 15 will do little to deliver the HMA's full OAN for market and affordable housing. Gladman note that Policy 15 is misleading in respect of Boston Borough which seeks to deliver 100 new affordable dwellings per annum, despite the evidence identifying a net affordable housing need of 263 dwellings per annum. Gladman consider that it is necessary to increase the housing requirement together with additional housing land and/or a more flexible and permissive approach to development adjacent to settlement limits to ensure full OAN of the HMA are delivered.	The provision of affordable housing is a fundamental priority of the Local Plan both in the targets set in Policy 15 and the flexible nature of this policy in helping developers deliver. Delivery, coupled with viability as well as the significant affordable housing need are key challenges for the Local Plan but a blunt response of increasing the overall amount presents no greater certainty of delivery of a larger amounts of housing whether market or affordable.		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 checked="" type="checkbox"/>	Justified		Effective		Consistent with national policy		
Sound	<input type="checkbox"/>									
Prepared in accordance with Duty to Cooperate	<input checked="" 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										
				It should also be recognised that the affordable housing needs are a proportion of overall housing needs and are not an additional consequence of market houses delivered. Artificially increasing needs that result in a significant increase in available sites has consequences for the value of land, potentially significantly increasing the loss of the highest grade of agricultural land, the need for more physical and social infrastructure and raises Duty to Cooperate issues with neighbouring authorities.						
				The affordable housing target of 100 pa for Boston is evidenced in the Boston Borough SHMA.						



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Response Number	487	Respondent Number:	2685	Comment Author:	Savills (UK) Ltd	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	<p>In light of our representations in relation to Policy 2, we consider that according changes should be made to Policy 11, concerning the Distribution of New Housing. These changes should raise the housing number for Holbeach and identify new sites accordingly to meet this. Specifically, we propose that 3 sites are allocated in order to achieve this. These sites lie within the freehold ownership of our client, are available for development and it is considered that development Would be suitable and achievable and therefore deliverable. We consider that without these changes, the Plan will be unsound in that it will not be positively prepared in supporting the levels of economic growth that are planned for in the town, and the opportunity that is presented by the high level of services and facilities that are also present.</p>			Officer Comment:	<p>The housing target has been informed by the findings of the South East Lincolnshire Assessment of Settlements &amp; their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011 and the rate of employment growth since 2009; land at lower risk of flooding and the South East Lincolnshire Infrastructure Delivery Plan (2016). Informed by this evidence the housing target of 2100 for Holbeach for the plan period is appropriate.</p>	
Policy Number:	11	Map Number:		Officer Recommendation:	<p>No change to the Local Plan is required.</p>					
Site Allocation Number:				<p><b>Do you consider that this part of the Local Plan is</b></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><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" 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:	<p>In order to make the Plan sound, we propose that the number of dwellings to be provided in Holbeach is increased from 2,100 dwellings to 2,420 dwellings. In order to accommodate this increase, We propose that the following new sites are added to the table at Paragraph 3.29 of the Plan, respective plans of which are appended to this representation. Site Reference Site Name Site Area (Ha)    Site Capacity                  Hob051 Land off Barrington Gate 3 90                  Hob052 Land Off Branches Lane 4.5 130                  Adjacent to Land South of Hall Gate 4 100</p>									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										

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Response Number	490	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	Officer Comment:		Officer Recommendation:		
Policy Number:	11	Map Number:		We support Policy 11 - Distribution of New Housing as it relates to Surfleet, and the proposed allocation of sites for a further 169 dwellings (including commitments and a number of sites for less than 10 dwellings).	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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	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.								

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Response Number: 534 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: 11 Map Number: Site Allocation Number: Policy 11 sets out the housing capacity for the proposed housing allocations that will be made in the sub-regional centres, main service centre and minor service centres. The Policy explicitly states that the housing numbers are inclusive of extant planning permissions and dwellings built since April 2011. In the Borough of Boston 7,500 houses are planned; 5,900 of which are in Boston itself (including parts of Fishtoft and Wyberton Parishes). In South Holland 11,125 homes are proposed to be allocated amounting to 18,625 in total. Notwithstanding DLP's assertions regarding the Council's housing requirement outlined above, the proposed overall housing land supply is 50 dwellings less than the housing requirement currently set out in Policy 10 (18,675). This shortfall is attributed entirely to the proposed shortfall in supply across the Borough of Boston. The Council, using their own evidence base has therefore not only failed to ensure that the objectively assessed development needs can be met but has also failed to provide any contingency in the proposed housing land supply to provide sufficient flexibility to respond to changing circumstances as required by the Framework. The Plan has therefore not been positively prepared, is ineffective and not consistent with national policy. Consequently the plan is considered to be unsound. This is a significant issue, not only in current national policy but the Local Plans Expert Group (LPEG) Report also recommends that the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF (para 11.4 of the LPEG Report). The Framework does not place a ceiling on the housing requirement, but instead seeks to boost significantly the supply of housing (paragraph 47). The housing requirement should not restrict the overall housing land supply and prevent sustainable development coming forward. We note that the Home Builders Federation (HBF), in their consultation response to the R.18 consultation, refer the Council to the DCLG presentation slide from the HBF Planning Conference September 2015. The slide illustrates 10-20% non-implementation gap together with 15-20% lapse rare. The slide also suggests the need to plan for permissions

Responses on the majority of these comments have been provided in respect of the OAN, the distribution of development and the choice of sites for the Boston urban area.

The identification of a 50 dwelling deficit is purely a mathematical consequence of rounding down the annual figure for Boston Borough from 302 pa to 300. Clearly such a deficit over the plan period is immaterial and not a "soundness" issue. Completions, commitments, differences in site capacities (to those assumed by the Local Plan) as well as infill and windfall and potential Rural Exception Sites are not accounted for in the current Publication Draft Local Plan but will bring about additional new homes.

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:

The Council needs to allocate further sites, particularly in Boston town, to meet the stated housing requirement and introduce flexibility by allocating sufficient sites that will address any future shortfall in housing delivery. The Council should also consider redrafting settlement boundaries, which are currently tightly drawn around each settlement to allow for sustainable housing development to come forward. It is considered that Fis017 and Fis017a should be allocated for residential development. The SA should be reviewed in light of the comments made in this representation and should provide clear reasons for selecting the preferred land use allocations and rejecting the alternatives. Sou006 should not be allocated for development unless the Council can demonstrate compliance with paragraph 14 of the National Planning Policy Framework. Detailed policies allocating the Sustainable Urban Extensions and any large site should be provided.

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

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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.

on more units than the housing start/completions ambition. Although this slide shows generic percentages across England it provides an indication of the level of flexibility within the overall housing land supply that the Council should be providing. Indeed best practice amongst Authorities which are in a position to meet their housing need in full, still allocate sufficient land to meet the need with a flexible supply. Consequently in order to render the Plan sound, the Council needs to, as an absolute minimum, allocate further sites to at least meet the correct housing requirement and introduce flexibility by allocating sufficient sites that will ensure needs are met and that the Plan can respond rapidly to change. The Council should also consider redrafting settlement boundaries, which are currently tightly drawn around each settlement to allow for sustainable housing development to come forward. Section 4 of this representation demonstrates that sites Fis017 and Fis017a are available, suitable and deliverable having due regard to the provisions of paragraph 47, footnote 11 of the Framework. Allocation of these sites would serve to assist the Council in providing flexibility to adapt to changing circumstances as required by paragraph 14 of the Framework. To maximise housing supply, the widest possible range of sites, by size and market location are required so that housebuilders of all types and sizes have access to suitable land in order to offer the widest possible range of products. Fis017 and Fis017a are located in the Fishtoft area, which in general, is not a deprived Ward. ONS statistics indicate that compared with the Lincolnshire average, its long term unemployment rate was below average (19.6% compared to 25.6%) as was its crime rate per 1000 at 28.5 compared to 49.7. Furthermore, the percentage of residents without access to a car is below the County average (15.1% compared to 18%). As such, it is likely to be an attractive market area for housebuilders. Further, it is noted that the Boston Borough SHMA (July 2015) identifies that 84.6% of the Borough's housing needs (2011-2036) are within Boston town itself. Policy 11 continues to propose to allocate new housing to accommodate 5,900 new homes in Boston (including parts of Fishtoft and Wyberton Parishes). This represents 78% of the Borough's proposed need (as specified in Policy 10). It is therefore apparent that there is clear evidence to support the direction of a higher proportion of the Borough's housing requirement to the town itself. The Joint Committee, in response to previous consultations state that this discrepancy reflects the general lack of availability of land at lower risk of flooding in and around the town. We

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acknowledge that a significant amount of land within and around the town of Boston is at risk of flooding. In fact the South East Lincolnshire Strategic Flood Risk Assessment (SFRA) (March 2017) highlights that approximately 85% of the entire Borough of Boston lies within the floodplain (84% in Flood Zone 3 'high probability', 1% in Flood Zone 2 'medium probability'). Thus it is evident that sustainable development cannot be achieved through locating development entirely within areas with a low probability of flooding, particularly given the level of housing need that must be met in the locality. Boston remains a sustainable location for development and the need for housing in this location is clearly evidenced. There are sites which are available, such as Fis017 and Fis017a which can offer multiple benefits and could be brought forward to meet the need, despite the fact they are located in areas at risk of flooding. Given the vulnerability of the proposed use the Exception Test should be applied (paragraph 102 of the Framework) to these sites. The Exceptions Test provides a method of managing flood risk for developments of certain flood risk vulnerability while still allowing necessary development to occur. Essentially, the two parts to the Test require proposed development to show that a) it will provide wider sustainability benefits to the community that outweigh flood risk; and b) that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall. The development of Fis017/Fis017a would provide some wider sustainability benefits to the community through its ability to help meet the housing need identified for Boston for the plan period. With reference to Part b) of the Exceptions Test, the SFRA states that there are a range of factors to be considered when determining whether or not a development is 'safe'. However, the minimum mitigation measures required for each flood hazard zone can be found in the standing advice matrix at Appendix C of the document. In this regard the sites would require direct consultation with the Environment Agency on the proposals. Finished floor levels should be informed by the predicted flood depth maps. It is therefore considered that both sites are capable of passing the Exceptions Test. It is noted that sites Sou066 and Wes002 are proposed to be allocated as Sustainable Urban Extensions to Boston, both of which lie in Flood Zone 3 (Danger to All, 1.0m to 2.0m depth). Overall, it is therefore considered that additional allocations, specifically Fis017 should be made within Boston in order to ensure that the plan is positively prepared and justified. Table 3: South East Lincolnshire Housing

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Allocations The proposed housing allocations for each settlement identified in Policy 11 are set out in Table 3 of the Publication Version of the Local Plan. Capacity of sites The table indicates the capacity of the sites shown on the Inset Maps, however paragraph 5.2.9 states that this is only a broad indication based upon 30 dwellings per hectare for sites within the Boston urban area and Spalding, and 20 dwellings per hectare for all Main and Minor Service Centres the stated capacity is not necessarily a maximum, or, in some cases a minimum capacity that would be expected on each site; viability, design, constraints and the most efficient use of land in delivering new homes should be the primary considerations in meeting housing needs. The fact that the capacities stated are not necessarily a minimum that need to be achieved, further compounds the need for the Council to allocate further sites in order to ensure that it can meet the full, objectively assessed need for market and affordable housing in the market area. Otherwise the plan will be ineffective and consequently unsound. As outlined in DLP's Report on the 5 year housing land supply position of Boston Borough Council, with regard to the capacity of sites, it is common practice to determine the net site area that will be developable as a percentage of the gross site area; known as the gross to net ratio. This is necessary to demonstrate that the sites considered for allocation are based upon a robust assessment (as per para 159 of framework). In this regard, the density at which a site can be developed will vary depending upon a number of factors including the policy context, the size of the site, configuration and the need for on-site infrastructure/ancillary uses such as schools, shopping areas, open space, flood attenuation and landscape buffer strips as well as roads. The difference in yields between net densities and gross densities has been explored by the Urban and Economic Development Group (URBED) through the Sustainable Urban Neighbourhood Initiative<sup>2</sup>. This showed that gross densities could be as little as 45% of net densities across an area which included neighbourhood facilities such as schools and parks. Although this work dates back to 2000, subsequent work undertaken by LPAs across the country in the preparation of their SHLAAs demonstrates that the research carried out by URBED has remained accurate since publication. Boston Borough Council's assumptions on site capacities are set out in paragraphs 3.1 to 3.3 of the South East Lincolnshire Strategic Housing Land Availability Assessment (SHLAA) (April 2017). It is evident from this report that the Council has not applied gross to net

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ratios. Paragraph 3.1 reiterates the Planning Practice Guidance which states that the estimation of the development potential of each site should be guided by the existing or emerging plan policy including locally determined policies on density. However, the Council confirm that neither the Boston Local Plan (April 1999) nor the emerging Local Plan specify residential densities. As such the Council has assumed, that unless a specific capacity was available (e.g. From a planning permission or Local Plan allocation) potential sites would be developed at the following gross densities: 40 dwellings per hectare in Central parts of Boston and Spalding; 30 dwellings per hectare elsewhere in Boston and Spalding and in central parts of Butterwick, Crowland Donington, Holbeach, Kirton, Long Sutton, Old Leake, Sutterton, Sutton Bridge and Swineshead; and 20 dwellings per hectare elsewhere. At paragraph 3.3 the Council state for some larger sites, assumptions on capacity have been reduced (where it is expected that they will contain major distributor roads, schools, neighbourhood centres, open spaces serving a wider area, or significant landscape buffer strips).

This approach taken by Boston Borough Council to assess the capacity of allocated sites is considered to be too broad and does not allow the Council to prepare an accurate housing trajectory to ensure the emerging plan meets the identified need for housing over the plan period.

In this regard the approach is not in accordance with the Framework that requires Local Planning Authorities to prepare a SHLAA to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period (paragraph 159) (DLP emphasis). In the event that capacities are over estimated, as is likely to be the case with Boston, by the point of receiving an application it is entirely likely that the cumulative capacity of sites will be substantially less than the Council have planned for. Therefore the assessment of capacities needs to be more accurate in its estimation; by taking realistic assumptions into account. This is a particularly pertinent issue on larger sites which will require on-site infrastructure and ancillary uses such as schools, local facilities, public open space, flood attenuation ponds etc. In undertaking the assessment of the Council's five year housing land supply position DLP has therefore objectively re-calculated the capacity of every site in Table 3 that is within Boston Borough. In the absence of any local evidence base, the approach outlined in the URBED Report is considered to be entirely reasonable and justified and was therefore used

Post Title: 5.2 Distribution of New Housing

as the basis for recalculating the capacity of each site. DLP's calculation used the highest net developable area where applicable, such that the following ratios were applied: Sites < 0.4 hectares 100% gross to net ration; Sites up to 0.4 2 hectares 90% gross to net ratio; and Sites over 2 hectares 75% gross to net ratio As per the Local Plan a density of 30 dwellings per hectare was applied on the developable area for sites in Boston and a density of 20 dwellings per hectare was applied on the developable area for sites in the Main and Minor Service Centres. The re-calculated capacities are shown in Appendix 2 of the report on the 5 year housing land supply position. In summary Table 3 identifies that the proposed allocations have the capacity to deliver 5,000 dwellings. DLPs calculation shows that the proposed allocations in Table 3 can be considered likely to only deliver 4267 dwellings which also has a significant impact on the Council's five year housing land supply position. It is noted that these capacities are based on the highest net developable areas suggested by URBED such that they are actually likely to be optimistic. In particular the two Sustainable Urban Extensions are likely to have a significantly lower gross to net ratio considering the likely infrastructure requirements including schools, public open space, flood attenuation and infrastructure relating to the BDR. In this regard it is noted that the Council consider that site Sou006 has the capacity to deliver 1515 dwellings on 63.31 hectares. This would entail circa 80% of the site being deliverable at 30 dwellings per hectare. Likewise, the Council consider that site Wes002 has the capacity to deliver 1138 dwellings on 45.92 hectares of land. This would entail circa 83% of the site being developed at a density of 30 dwellings per hectare. These are clearly unreasonable assumptions and are not justified by any local evidence. Given the lack of flexibility provided in the supply it is therefore considered necessary to allocate sites sufficient to provide at least an additional 733 dwellings, even to just meet the minimum housing requirement for Boston currently specified in the Local Plan (7,550 dwellings), let alone the proposed requirement of 12,200 proposed by SPRU. Site selection The Council have not set out in any topic paper or evidence base document a clear process undertaken to select sites to meet the Council's spatial strategy. The Council have failed to consider the selected sites against the Framework and national guidance. Throughout the Framework policies set out how LPAs should consider policies and site allocations, to ensure that the three strands of sustainable development are maximised. There is no information which considers the merits of



Post Title: 5.2 Distribution of New Housing

each site and how they contribute to sustainable development. In the absence of a site selection paper, the only document which we consider can be used to justify the selection of sites is the Council's SA. However this document does not consider the Local Plan section of the Framework. As noted above, SPRU has undertaken a critical review of Council's SA and has identified a degree of legal non-compliance. In particular, SPRU identified that one of the most significant areas of non-compliance is that that reasons for selecting the preferred land use allocations and the rejection of alternatives is not given. Given that the SA is the only evidence base document which considers the selection of sites, the process is not transparent and there is no evidence that the sites selected have been chosen in the pursuit of sustainable development or are the most sustainable sites to deliver the spatial strategy of the Local Plan. In *Save Historic Newmarket v. Forest Heath DC* [2011] J.P.L. 1233: The primary ground of the challenge was that the Core Strategy and accompanying SA/SEA environmental report did not explain what reasonable alternatives to the proposed policies [or sites] had been considered and why they had been rejected. Collins J considered the requirement to consider alternatives in the context of an iterative plan making process (various drafts consulted upon, sifting the options, then final draft consulted upon, examined and adopted): For there to be compliance with Article 5 of the SEA Directive, the public must be presented with an accurate picture of what reasonable alternatives there were to the proposed policies and why they were not considered to be the best option. The South East Lincolnshire SA only describes the assessment of alternative sites and does not set out why they were not considered to be the best option. In an iterative plan-making process, it is not inconsistent with the SEA Directive for alternatives to the proposed policies to be ruled out prior to the publication of the final draft plan, but if that does happen the environmental report accompanying the draft plan must refer to, summarise or repeat the reasons that were given for rejecting the alternatives at the time when they were ruled out and those reasons must still be valid. There are no reasons for alternative sites being rejected at this stage or an earlier stage. Further to the similarities between the South East Lincolnshire SA and *Save Historic Newmarket v. Forest Heath DC*, there is no clear site assessment process undertaken by the Council. It is noted that housing topic papers which supported earlier version of the plan, set out the reasons why sites will not be removed from their status as then preferred allocations,

**Post Title:** 5.2 Distribution of New Housing

but importantly it is not apparent from any documentation the initial reasoning and justification to allocate sites. If the SA report, in its current form were to be challenged in the courts, in our view a challenge may succeed, with potential ramifications for the Plan itself. Ultimately this could strike out all or specific policies from use in decision-making and determining planning applications.

**Post Title: 5.2 Distribution of New Housing**

Response Number: 553 Respondent Number: 988 Comment Author: Hume Planning Consultancy Ltd Client: Broadgate Homes Ltd & Broadgate Builders (Spa) Web Link:

Paragraph Number: 5.2.9 Table/Figure: 3 Comment Content: Officer Comment: Officer Recommendation:

Policy Number: Map Number: Broadgate support the overall level of development proposed for Spalding under Policy 11 Distribution of New Housing which amounts to a housing target of a minimum of 5,255 dwellings (2011-2036) derived by applying an average density of 30 dwellings per hectare to the gross areas of the allocated sites. 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
- Sound
- Prepared in accordance with Duty to Cooperate

- 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

Broadgate support the quantum of housing that is directed to Boston comprising 5900 dwellings under Policy 11 Distribution of New Housing'. The supporting allocation table at paragraph 5.2.9 specifically allocates Broadgate's Land South of North Forty Foot Bank Ref Wes02 (which amounts to an area of 46.43 ha) for up to 1138 dwellings. This allocation is Supported.

This small site lies within the settlement boundary and whilst Butterwick is a lower order settlement Policy 11 directs some 70 dwellings to it. The site is allocated under plan ref But020 and is well related to the heart of the village. Site ref But020 is therefore supported and it is relevant that this is the least peripheral of the allocations at the settlement, with allocation BU002 and BUT 0004 lying north of the Broadgate site.

Gosberton is identified as a "Minor Service Centre" at Policy 11. The settlement because of its service function, is recognised as a sustainable location within the settlement hierarchy and is expected to contribute some 270 dwellings during the local plan period (and with the settlement of Weston) is planned to experience the most growth because of the settlement's characteristics and sustainability credentials. Broadgate control a brownfield site Gos003 (estimated yield 81 dwellings) which is supported.

Quadring is identified as a "Minor Service Centre" at Policy 11 which reflects the level of services and facilities it provides and its role within the wider catchment. The settlement is expected to contribute some 130 dwellings during the local plan period. Preferred Allocation Qua004, Land East of Cresswell Drive, is expected to yield some 18 dwellings and this target yield and the allocation is supported by Broadgate who are committed to delivering this component of the overall plan strategy.

Kirton is a settlement with a wide range of facilities and with the inclusion of parts of Frampton Parish, the plan,

**Post Title:** 5.2 Distribution of New Housing

under Policy 11, directs 500 dwellings to the settlement because of its "Main Service Centre" status. This scale of growth is supported by Broadgate and this scale of growth recognises the sustainable credentials and existing level of service and employment provision at the settlement.

**Post Title: 5.2 Distribution of New Housing**

Response Number	556	Respondent Number:	932	Comment Author:	DLP (Planning) Ltd	Client	Mr R Hardy and Richard Hardy (Fishtoft)	Web Link	
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Paragraph Number:		Table/Figure:	3	Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:		Map Number:		This approach taken by Boston Borough Council to assess the capacity of allocated sites is considered to be too broad and does not allow the Council to prepare an accurate housing trajectory to ensure the emerging plan meets the identified need for housing over the plan period.  The Council's selection of sites is flawed because the evidence based used to justify their selection is not robust.  The allocation of Sou006 is not justified, nor is it consistent with national policy  There are no policies detailing the allocations of the proposed sustainable Urban Extensions in Boston or the Boston Distributor Road and how they will be delivered.  See supporting written representation made on behalf of Mr R Hardy and Richard Hardy (Fishtoft) (Paragraphs 3.59 - 3.103) for details.	It is not agreed that the approach to assessing the capacities of Housing Allocations is inappropriate.  It is not agreed that additional Housing Allocations in Boston are required to meet the objectively assessed housing need.  It is not agreed that the evidence for the selection of Housing Allocations is not robust.  It is not agreed that the identification of site Sou006 as a Housing Allocation is not justified or is inconsistent with national policy.  The issues around the Spalding Western Relief Road and the Vernatts and Holbeach West Sustainable Urban Extensions are considerably more complex than those around the Boston Distributor Road (BDR) and Housing Allocations Sou006 and Wes002. Consequently, there is considered to be no need for specific policies to guide the delivery of the BDR and Hosuing Allocations Sou006 and Wes002.  It is not agreed that the Sustainability Appraisal should be amended in the ways sought by the objector.  Site Fis017a - the South East Lincolnshire Strategic Housing Land Availability Assessment identifies that this site is developable. Given that it is exposed to less severe flood risk than other similar sites which are identified as Housing Allocations in the Local Plan Publication Version, there is an arguable case for it to be allocated.	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 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 Council should allocate additional sites to ensure the plan meets the objectively assessed housing need.

The SA should be reviewed in light of the comments made in this representation and should provide clear reasons for selecting the preferred land use allocations and rejecting the alternatives.

Sou006 should not be allocated for development unless the Council can demonstrate compliance with paragraph 14 of the National Planning Policy Framework.

The Council should allocate Fis017 as this is the most appropriate allocation and therefore strategy when considered against the reasonable alternatives.

Detailed policies allocating the sustainable Urban Extensions and any large site should be provided.

See supporting written representation made on behalf of Mr R Hardy and Richard Hardy (Fishtoft) (Paragraphs 3.59 - 3.103) for details.

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

**Post Title:** 5.2 Distribution of New Housing

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: 5.3 Vernatts Sustainable Urban Extension**

Response Number	336	Respondent Number:	1238	Comment Author:	Pedals	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Our comments on Policy 31 on the 2016 version of the plan remain valid for further consideration.			Officer Comment:	Officer Recommendation:
Policy Number:	12	Map Number:	2	<p>Policy 12: Vernatts Sustainable Urban Extension (Policy 12) has been reviewed in the light of the comments made and, accordingly, changes to bullet point v. are proposed. However, it is not considered appropriate at the present time to commit to the Spalding Western Relief Road's inclusion of segregated cycle facilities pending the consideration of more detailed work on the design of its Northern and Southern sections. The reference to the significant cycle route linking Pinchbeck with Spalding via Blue Gowt Lane and Two Plank Lane being omitted from Inset Map No.2 has been addressed under comments made on Inset Map No.2. In conclusion, the Local Plan should be changed as follows:                  Bullet point v. to be amended as follows:                  'maximise opportunities for safe and convenient walking and cycling by giving careful consideration to the location of key uses within the Sustainable Urban Extension and by providing links to neighbouring areas'.</p>			Further consideration of this matter will be necessary as part of the Examination.		
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" 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:	Change the text of Policy 12 in accordance with the requests we made in relation to Policy 13 of the 2016 version of the plan.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title:** 5.3 Vernatts Sustainable Urban Extension

<b>Response Number</b>	344	<b>Respondent Number:</b>	1686	<b>Comment Author:</b>	Network Rail	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	12	<b>Map Number:</b>		The policy is for a sustainable extension of Spalding, however it predominantly relies on road transport as its main form of transport. As a sustainable urban extension we would expect that the policy provides support for the use of rail facilities and infrastructure. The town has direct links to the major conurbation of Peterborough. We would expect that provision is made for the support and upgrade of rail and station facilities.	It is not expected that the developers of the Vernatts Sustainable Urban Extension should provide financial contributions to support and upgrade local rail and station facilities simply because rail is regarded as a more sustainable form of transport.	No change to the Local Plan is required.			
<b>Site Allocation Number:</b>									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
<b>Legally Compliant</b>	<input checked="" type="checkbox"/>	<b>Positively Prepared</b>	<input checked="" type="checkbox"/>						
<b>Sound</b>	<input type="checkbox"/>	<b>Justified</b>	<input type="checkbox"/>						
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>	<b>Effective</b>	<input checked="" type="checkbox"/>						
		<b>Consistent with national policy</b>	<input type="checkbox"/>						
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>	To ensure the soundness of the policy we would ask that an additional bullet point is added to the section titled "Development proposals will be expected to" and the inclusion of the following: ix) Make appropriate provision for the upgrade of rail facilities to encourage sustainable travel.								
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									



**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number: 349 Respondent Number: 935 Comment Author: Longstaff Client: Web Link:

Paragraph Number: 5.3 Table/Figure: Comment Content: Officer Comment: Officer Recommendation:

Policy Number: 12 Map Number: 2 Site Allocation Number: Mon 004/

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

- Legally Compliant
- Sound
- Prepared in accordance with Duty to Cooperate

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

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

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

The development of part of site Pin 045 (east of the Joint Railway Line, together with the areas of land Mon 004/008/014/015/016/017/019, instead of proposed phases 1 and 2 of the SUE on Pin 045/part 024

To challenge the robustness of the FRA analysis, and to explain that the provision of Housing allocations in and around Spalding, outside the SUE, will allow for existing road infrastructure (the Spalding Bypass) to be utilised, instead of the proposed burden on the existing road infrastructure through the primary Industrial areas, that will be created by the proposed housing allocations in the SUE area.

The reasoned statement within the Draft Submission Local Plan - section 5.3, and Policy 12, explains the reasoning for changing the allocation of housing in Spalding, to primarily effect that a Spalding Urban extension will provide for 4,000 new homes over 3 phases in the areas to the north and north west of Spalding. It is seen however that the majority of housing development is to be delivered after the completion of the part of the Spalding Western Relief Road running from Spalding Road all the way to the A151 Bourne Road, thus avoiding the creation of a significant cul-de-sac development, due to the significant size of the proposed area of development, and more particularly after the Local plan period. In doing this planners have advised they are now ignoring their previous concerns about allowing the virtual coalescence of the settlements of Pinchbeck and Spalding. They state this is for reasons of practicality. In reality it will create further traffic in the area which links via the Industrial areas of Spalding to onwards road infrastructure, which can only create a more significant burden on the existing infrastructure in that area. If planners had chosen to continue to include the allocations on the land to the east of the Joint Railway line and west of Spalding Road, (part of Pin 045) together with all the previously preferred allocation sites to the west of the town (off Bourne Road), this would have allowed for the funding of the most northern and central sections of the relief road, as the landowners Roe, Smiths, De Leeuw and Smalley are prepared to work together in collaboration on the west side of the proposed Relief road corridor, in conjunction with Smiths on the east side of the Relief Road corridor, to provide a unified deliverability of the infrastructure needs, and providing for the housing allocations required to be delivered in the Local Plan period. From a Flood risk point, the Flood Hazard and Flood Depth maps for the area to the west of Spalding, and the area to the north west of the Vernatts appear very similar, and therefore there is some doubt that there is a greater flood risk on the land to the west of Spalding, and the robustness of the FRA analysis is questioned. In summary the development of part of site Pin 045, together with the areas of land Mon 004/008/014/015/016/017/019 can be delivered in the plan period, and do not require the costly provision of a railway crossing and further extensive road infrastructure. If these areas are developed in conjunction with the southern Holland Park proposed

The decision not to promote Sites Mon004/008/014/015/016/017/019 as housing allocations was informed by flood-risk considerations following an update of the Strategic Flood Risk Assessment for South Holland District and a review of the proposed funding arrangements for the SWRR. Moreover, the recommended change appears contradictory in that it is seeking, inter alia, development on Site Pin045 between the Joint Line railway and Spalding Road and also deletion of Phase1 of the Vernatts Sustainable Urban Extension!

No change to the Local Plan is required.

**Post Title:** 5.3 Vernatts Sustainable Urban Extension

infrastructure provision (the southern section of the Spalding Western Relief Road), this will give a link round the town via the existing A16 Bypass to all directions, north, south, east and west. The connecting north-south link of the relief road and the further housing proposed in phase 3 can be provided after the plan period post 2036, with the development of the rest of the areas Pin 045 and Pin 024.

<b>Response Number</b>	352	<b>Respondent Number:</b>	2803	<b>Comment Author:</b>	Education and Skills Funding Agency	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	12	<b>Map Number:</b>	2	The ESFA welcomes reference within the plan to support the development of appropriate social and community infrastructure and within Policy 12: Vernatts Sustainable Urban Extension, specific reference to the need to deliver new or expanded schools. We would welcome the opportunity to discuss how the ESFA may be able to assist in ensuring that the new primary school is delivered during the early phases of this planned development.	The support noted and welcomed		No change to the Local Plan is required.		
<b>Site Allocation Number:</b>									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
<b>Legally Compliant</b>	<input checked="" type="checkbox"/>	<b>Positively Prepared</b>	<input type="checkbox"/>						
<b>Sound</b>	<input checked="" type="checkbox"/>	<b>Justified</b>	<input type="checkbox"/>						
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>	<b>Effective</b>	<input type="checkbox"/>						
<b>Consistent with national policy</b>	<input type="checkbox"/>								
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									

**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number	363	Respondent Number:	2654	Comment Author:	Historic England	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	12	Map Number:	
Site Allocation Number:			

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

Legally Compliant	<input 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:**

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:

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In order to address the issues, it is recommended that revisions are made to Policy 12 Development proposals will be expected to: section through additional points, and renumbering of points, as follows: i. Undertake a heritage impact assessment to inform the Masterplan. The heritage impact assessment will identify heritage assets including nondesignated archaeology, assess their significance, and assess the impact of the development on their significance. Appropriate measures for mitigation and enhancement should be identified and set out in the assessment. ii. The heritage impact assessment must form the basis for approaches to the layout and design of development across the site. Planning applications for the site should accord with the heritage impact assessment. It is recommended that the points be renumbered with these at the start since they form the basis of the proposed SUE and particular requirements set out in the current points. It is also recommended that the four point list relating to infrastructure provision through S106 agreements be revised to include the historic environment. For example, 5. Mitigation measures and/or enhancement in respect of the historic environment or a similar alternative. Additional text relating to the particular importance of the historic environment would need to be included in the Reasoned Justification section.

It is very disappointing to note that the virtual coalescence of the settlements of Pinchbeck and Spalding has been dropped for reason of practicability particularly since the resulting merging of the two is likely to have an adverse impact on heritage assets, including Pinchbeck Conservation Area, as well as the local distinctiveness of the two settlements. Phase 1 development could potentially be masterplanned to ensure some separation remains between the two settlements and it is not clear from existing information how this might have been considered or ruled out. With regard to Policy 12 there is concern that the historic environment is not mentioned when the SUE site would be likely to impact on potentially significant archaeology. Various land drains and field patterns forming part of the historic landscape character, and associated with Vernatts drain, would need to be considered in addition to potential archaeology. There are various ring ditches, cropmarks etc indicative of Romano British settlements within the site area and these would need to inform the development. As such, it not clear how effective the approach of the policy is, or whether the proposed allocation is sound.

The allocation of land resulting in the virtual coalescence of the two settlements is regarded as an inevitable consequence of priority being given by the Joint Strategic Planning Committee to securing the funding and delivery of the Northern section of the Spalding Western Relief Road. However, it is not considered that such coalescence would detract from the appearance and character of the Pinchbeck Conservation Area or its setting.

The Publication Version of the emerging Local Plan already makes provision for two areas of recreational open space in Phase 1 of the Vernatts Sustainable Urban Extension and this should be taken into account in the preparation of the master plan for the area. The comments on the need to promote the interests of the historic environment and the essence of the suggested alterations to Policy 12 and its reasoned justification are accepted.

In conclusion, the Local Plan should be changed as follows:  
Under 'The provision of new or enhanced physical and community infrastructure...:' add another criterion to the list:

'5. mitigation and/or enhancement measures in respect of the historic environment'.

Under 'Development proposals will be expected to:' add the following criteria at the beginning of the list and renumber accordingly:

- Undertake a heritage impact assessment to inform the master planning of the site. The heritage impact assessment will identify heritage assets including non-designated archaeology, assess their significance, and assess the impact of the development on their significance. Appropriate measures for mitigation and enhancement will be identified and set out in the assessment.'; and

- The heritage impact assessment must form the basis for approaches to the layout and design of development across the site. Planning applications for the site should accord with the heritage impact assessment.'

Add new paragraph 5.3.4 as follows:  
A heritage impact assessment will ensure that, in

Further consideration of this matter will be necessary as part of the Examination.

**Post Title:** 5.3 Vernatts Sustainable Urban Extension

Participate in Examination:

Why wish to participate

addition to potential archaeology, the various land drains and field patterns forming part of the historic landscape character of the area, and associated with the Vernatt's Drain, are taken into account in preparing the master plans.

**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number	376	Respondent Number:	2816	Comment Author:	Mr & Mrs R Parr	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	12	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:

Participate in Examination:

Why wish to participate

Both my husband and I have lived in Pinchbeck for 15 years having moved from Spalding and we have some concerns with the new development proposed for Pinchbeck and Spalding. Concerns that we have include the use of agricultural land for building and as a nation we should be very wary of concreting over all of our land especially in the turmoil of Brexit as we need to be focusing long term on food security; it is not only locals relying on Lincolnshire for vegetables but the whole of the UK. If you have lived in the area for any amount of time you will be only too aware that the drainage/sewage system in this area is a complete joke and not fit for purpose! Roads are constantly being closed for long periods to sort out collapsed drains meaning that the roads leading into town are at gridlock, what will happen with another 5000+ houses with potentially 10000 more cars driving into town. And all will Anglian water be ready for the amount of effluent flowing its way???? Yes I've read that you have acknowledged that such things will need to be considered but I'm guessing the report is hollow words and you will be happy to continue with building your mega town regardless of such concerns and patch up the problems when they occur! Historically the local council managed to make a mess of the bypass to Peterborough so how would we be reassured that you are actually capable of making decisions about relief roads around Spalding/Pinchbeck and where is the money coming from? I've worked at Pilgrim Hospital for 18 years and the town is still waiting for its bypass. Are you not concerned that Pilgrim Hospital is likely to be losing Maternity, Neonatal ward, Childrens Ward and its A & E, where are the people of Pinchbeck and Spalding going to go...already the NHS is struggling in our area, do you feel that you should be consulting the Hospitals at Peterborough and Boston to see if they can cope with the extra people moving to this area? We have many more concerns but we feel that they will fall on deaf ears and that although the public can vent their worries the deal has been sealed. Finally on a more personal note, we bought our home in good faith knowing that the field behind us could not be built on, this was pointed out by our solicitor during the searches and was what made us choose to live here rather than a housing estate. In our deeds it states and I quote not to use the said land (edged red on Plan 2 annexed hereto) or any part or parts thereof for any purpose other than agriculture. Do you as a council have the power to

Given the predominance of high-quality agricultural land around Spalding and the great majority of South Holland District, the loss of such land is, regrettably, an inevitable consequence of seeking to meet the need for housing in the locality.

The proposals for the Vernatts Sustainable Urban Extension have been informed by the preparation of an Infrastructure Delivery Plan, and emerging Policy 30: Delivering the Spalding Transport Strategy seeks to support the delivery of transport improvements across the town by seeking financial contributions from the housing and other developers who will be generating traffic growth.

It is considered that the existence of a restrictive covenant does not necessarily preclude the land in question being promoted as part of a much larger area for development through the Local Plan.

No change to the Local Plan is required.

**Post Title:** 5.3 Vernatts Sustainable Urban Extension

change the deeds without discussion with the occupants of my street as I'm sure their deeds read the same? Could you please advise us on the latter part of this email with regards to your powers before we seek legal advice. I will provide you with a copy of my deeds if you require but I am assuming your legal team should be aware of the covenants conditions and stipulations contained in said Conveyance.

**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number	389	Respondent Number:	2769	Comment Author:	Firstplan	Client	Mr J Johnson, Locks Farm, Spalding	Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	12	Map Number:		Policy 12 Vernatts Sustainable Urban Extension (VSDE) is not considered sound as it fails the NPPF (2012) tests in terms of not being justified, effective, consistent with national policy nor positively prepared. The NPPF requires that a plan should be deliverable over its period to be effective. The level of proposed housing directed to the VSDE is not required within the plan period. Given that the overwhelming majority of the VSDE housing will be delivered beyond the lifetime of the plan, a strategy that dictates and determines such a significant level of housing and it's location for an extended period cannot be considered to be effective or positively prepared. The VSDE allocation is being pursued as a means of funding the Spalding Western Relief Road (SWRR). The SWRR will only benefit the VSDE and the proposed housing will increase congestion on the existing highway network. Indeed, the SWRR will only be partially implemented in a disjointed phased approach over the plan period. The completion of the SWRR together with the final and greater housing tranche (3,000 approx.) will not occur until beyond the time expiry of the plan. The SWRR and associated infrastructure is to be paid for via negotiations with developers and partners and Section 106 contributions. Lincolnshire County Council has estimated the SWRR cost to be between £71 m rising to £100m, though a detailed cost estimate has not been undertaken. Given the uncertainty over the actual cost of delivery, and the reliance upon negotiating and securing a very substantial but unknown quantum of developer contributions, the viability and therefore deliverability of the SWRR is highly questionable. As such, the proposal fails the positively prepared test. The supporting text at Paragraph 5.3.2 sets out that the aim of avoiding the virtual coalescence of Pinchbeck and Spalding has been dropped for reasons of practicability. Coalescence is a significant issue that cannot just be dropped. The general thrust of the NPPF seeks to protect the intrinsic character of the countryside. Whilst a stated goal of national greenbelt policy is the prevention of neighbouring towns from merging into one another, the coalescence of Pinchbeck and Spalding would be harmful to the character of the area and not consistent with the general thrust of policies protectin the countr side. Furthermore, the VSDE does not have a defensible boundary. The boundary seems to be based purely on site ownership and field boundaries. In comparison the South East Quadrant (SEQ) has clear	The sites forming the 'South East Quadrant' (SEQ) are not considered to be a more suitable alternative to the Vernatts Sustainable Urban Extension (Vernatts SUE) for the purpose of delivering significant housing growth in Spalding.  The Spalding Western Relief Road (SWRR) will benefit more than the Vernatts SUE as the objectives of the SWRR, as set out on the Lincolnshire County Council website, clearly demonstrate; and the fact that developer contributions are required to fund the delivery of the road is not, in itself, a reason for supporting the SEQ instead.  It should be noted that no part of the South East Lincolnshire Local Plan area is designated as 'Green Belt' and, therefore, the concern about the coalescence of Spalding and Pinchbeck is unfounded.  The Update of the South Holland District Strategic Flood Risk Assessment was prepared in close consultation with the Environment Agency, and there is no reason to doubt the robustness of its findings. Accordingly, it is still considered that the Vernatts SUE remains a sequentially-preferable location for accommodating significant housing growth.	No change to the Local Plan is required.
Site Allocation Number:						

<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>	
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:	
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Proposed changes to make compliant or sound:	Allocate the Southeast Quadrant including sites Stm005, Stm026, Stm016, Stm017 and Stm018 for housing.
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Participate in Examination:	<input checked="" type="checkbox"/>
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Why wish to participate	To ensure that the Southeast Quadrant is examined in detail as a suitable and appropriate site to help meet Spalding's housing need.
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**Post Title:** 5.3 Vernatts Sustainable Urban Extension

boundaries defined by Spalding Drove, Burr Lane and the B1173. The proposed VSDE is not justified as it is not the most appropriate strategy when considered against reasonable alternatives. Indeed, alternative development options, such as providing housing in the SEQ, has not been adequately considered as an alternative, including our client's site Stm18 (Locks Farm). The SEQ has a number of advantages over the current VSDE allocation. Development of the SEQ for housing would not result in coalescence. It could deliver a proportion, or meet Spalding's full housing need, whilst still contributing to the delivery of a relief road or other highway solutions via financial contributions. The site is situated in a sustainable location and close to a consented employment generating development. The Council acknowledge that it is accessible to Spalding's existing services and facilities and is located within/adjacent to Spalding's existing built up area (defined settlement limit). In highways terms, the SEQ could be brought forward without reliance on disproportionately high infrastructure costs and has a large enough frontage onto Barrier Bank for a safe and suitable access to be provided. Additionally, access onto the A16 via Burr Lane and the link road running along the line of old March railway would be good as set out in the SHLAA Spalding July 2016. From an agricultural land quality perspective, the SEQ is comprised of lower grade land than land on the north and west of Spalding within the VSDE, which is of greater value. With regard to flood risk, a Flood Risk Technical Note (dated May 2017) to supplement the Flood Risk Assessment (dated December 2016) prepared by Ambiental is submitted alongside these representations and should be referred to. The reports provide a review of South Holland SFRA (2016) and its 2017 update and raises a number of concerns regarding the flood data and modelling. In particular, a number of questions are posed, which highlight the weaknesses in the flood evidence base. In summary, it can be demonstrated that the other land e.g. Vernatts Sustainable Urban Extension potentially poses a similar risk of flooding as the SEQ. Due to the lack of clarity over the data, and the similar risk level, the plan is not based on proportionate evidence and is therefore not justified. For the reasons set out above, neither Policy 12 nor the Local Plan can be considered justified, effective, consistent with national policy or positively prepared. Accordingly, the current Vernatts Sustainable Urban Extension allocation and the Plan fail the NPPF test of soundness and a new housing strategy for Spalding that allocates the Southeast Quadrant for housing development should be prepared.



**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number	451	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:	12	Map Number:		<p>The plan emphasises the importance of housing delivery linked to important infrastructure which is to be achieved by the planned urban extension (Policy 12), alongside the Spalding Western Relief Road (SWRR). It is relevant that the IDP attributes a cost of £47million to connect Spalding Road all the way to the A151 Bourne Road.</p> <p>The omission of the former references to an area of separation between Spalding and Pinchbeck contained in the updated Policy 12 is necessary in order to deliver the major infrastructure improvement of the SWRR, as the increase in housing numbers will assist with developer funding provided this is appropriately phased. This aspect of the Policy is supported.</p> <p>Policy 12 alone will deliver some 4000 dwellings together with associated infrastructure, this level of expansion and the direction of growth of the settlement is supported. The expansion of the settlement to the west provides a logical extension to Holland Park and land to the north of Vernatts Drain.</p> <p>Broadgate support fully the expansion of the West side of Spalding and the strategic allocations to the north. With a track record of delivery at Spalding and Boston, and knowledge of the housing market Broadgate will seek to work with both the LPAs in delivering housing in this location to meet the development needs identified. Broadgate recognise that the delivery of the complete SWRR whilst a long-term prospect, is an essential connection for achieving transport improvements and achieving quality place making. The mechanism for the achievement of this link should be a development agreement for the road between landowners and stakeholders. Without the frontloading of a delivery mechanism of the road within the policy Wording, the strategic road construction can be frustrated. As a result, the policy will actually serve to frustrate delivery by encouraging piecemeal development and the policy will not be effective. Broadgate strongly supports the delivery of the relief road and for this reason strongly objects to Policy 30 (as set out above at paragraphs 3.4-3.13).</p> <p>It is too early to settle on the phasing provisions contained in the Vernatts Sustainable Urban Extension Policy 12 until such time as the delivery and funding</p>	<p>The representor raises several issues which emanate from consideration of Policy 12: Vernatts Sustainable Urban Extension (Policy 12) and its relationship with Policy 29: Delivering a More Sustainable Transport Network (Policy 29), Policy 30: Delivering the Spalding Transport Strategy (Policy 30) and, more specifically, the delivery of the Spalding Western Relief Road (SWRR). In order to facilitate more detailed consideration of the issues raised, discussions will be held with Broadgate Homes Ltd and other interested parties with a view to reaching agreement on appropriate responses before the Local Plan examination commences. These discussions should include the following matters:</p> <p>A. The need for a ‘SWRR Delivery and Funding Strategy’ covering the road’s entire length, and what form it should take given that there is no current proposal for a Community Infrastructure Levy (CIL);</p> <p>B. The need for a ‘infrastructure delivery and prioritisation’ mechanism (or mechanisms) to cover the Local Plan area;</p> <p>C. Having regard to A. and B. Above, the appropriateness or otherwise of using Policy 30, or a revision of it, to secure transport funding;</p> <p>D. Current work by Lincolnshire County Council, as Highway Authority, on the prioritisation of projects set out in the Spalding Transport Strategy;</p> <p>E. The need to provide a wide choice of high-quality homes in Spalding;</p> <p>F. The proposed projects set out in the recently-successful Homes and Communities Agency funding bid and how these can inform a way forward;</p> <p>G. The role and nature of the current ‘Memorandum of Understanding’ for the Holland Park SUE and whether a similar-such vehicle could be applied to the Vernatts SUE;</p> <p>H. Having regard to A. – G. Above and any other relevant matters, identifying an agreed basis for a review of Policies 12, 29 and 30.</p> <p>Contrary to the point made in paragraph 4.8 of the Representor’s letter (see para 8 in comment column), it should be noted that no suggested policy wording has been provided.</p> <p>Contrary to the point made in paragraph 4.6 of the Representor’s letter (see para 6 in comment column), it should be noted that paragraph 3.7.9 of the Publication Version states:</p> <p>‘The Local Planning Authorities do not intend</p>				<p>Further consideration of this matter will be necessary as part of the Examination.</p>	
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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 checked="" type="checkbox"/>									
Why wish to participate	Because of Broadgate's experience of housing delivery and the importance of the provision of strategic infrastructure to bring forward the time-scales for housing development.									

**Post Title:** 5.3 Vernatts Sustainable Urban Extension

strategy for the complete relief road is in place.

A weakness of the Policy is that the phasing is very vague. For instance, Paragraph 5.3.2 states, "Infrastructure requirements for the urban extension will be developed through the Infrastructure Delivery Plan and Whole Plan Viability Assessment". However, there are references in the IDP to the likelihood of CIL and the South-East Lincolnshire IDP 2016 also describes itself as a "live toolkit". In the "Developer Contributions" chapter of the Plan there is reference at paragraph 3.7.9 to CIL contributing in the short - medium term but in other parts of the plan it is anticipated to be long term. This is clearly an issue that needs addressing as it currently creates considerable uncertainty.

The importance of the Spalding SWRR as a central building block of the whole plan strategy is acknowledged and to promote early delivery key infrastructure junctions that Broadgate Homes control should be the subject of an agreed phasing programme in conjunction with a wider masterplan and development agreement for the road between relevant stakeholders. The major allocations to the North of Spalding are within the control of two major land owners. These sites are subject to a successful HCA funding bid to facilitate a mechanism to deliver this stage of the road. Amended policy wording must be prepared prior to the examination, which will tie the developers to Working with the Local Authorities to produce a masterplan to deliver the road and the development. Until the masterplan is prepared and agreed by the Council, no development should take place. This principle regarding phased provision should also guide the development time-scales and infrastructure delivery for the land to the West of Spalding.

Table 3 identifies 894 dwellings (from 7 separate sites and representing 46% of the total allocations for Spalding) for the plan period at Spalding and the policy must ensure that each development parcel equitably contributes to the upfront cost of early infrastructure phases within a framework that guarantees the complete link route. Suggested policy wording is set out below.

There is also reference in the IDP that the South-East Lincolnshire Joint Strategic Planning Committee (SELJSPC) "should consider" an infrastructure delivery and prioritisation mechanism. For this reason, each

introducing a Community Infrastructure Levy (CIL) in the short-medium term.'

**Post Title:** 5.3 Vernatts Sustainable Urban Extension

phase of the WRR must be provided in association with the commensurate phase of development, ensuring that there is an equitable contribution of all allocated and windfall sites to the SWRR. If this is not clearly enshrined in the policy then the policy will serve to encourage early planning applications on the allocations which lie outside the safeguarded route. This would mean that the landowners within the safeguarded corridor would carry an additional financial burden.

Given Broadgate's landholding at the southern and northern end of the strategic allocation, without the support contained in the policy wording, Broadgate's willingness to take a longer-term view on upfront road infrastructure cost to achieve early delivery will be compromised.

The WRR and its proper phasing is essential for the level of development proposed for Spalding over the Plan period. Lincolnshire CC as lead delivery role combined with the Steering Group need to be talking to Broadgate and adjustments to the Wording of the policy regarding phasing will be Critical as the road is such an integral part of the solution to wider housing delivery.

As stated above, the Inspector must be satisfied that SWRR will be delivered.

**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number	477	Respondent Number:	2075	Comment Author:	Anglian Water	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	12	Map Number:		Anglian Water has no objection to the principle of development of the Vernatts Sustainable Urban Extension. However it is recommended that Policy 12 should include reference to foul drainage as well as managing the risk of surface water flooding.	The proposed additional criterion dealing with foul drainage is accepted.  In conclusion, the Local Plan should be changed as follows: Under 'Development proposals will be expected to:' add the following criterion and renumber appropriately:  'incorporate a foul drainage strategy for the Vernatts Sustainable Urban Extension as a whole, and for each phase'.		Further consideration of this matter will be necessary as part of the Examination.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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:	It is therefore suggested that Policy 12 should be amended as follows: ix. incorporate a comprehensive Sustainable Drainage System to manage surface water drainage and safeguard against any increased flood risk. x. incorporate a foul drainage strategy for the site as a whole and for each phase;								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number	515	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	12	Map Number:	
Site Allocation Number:	Pin045		

<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>	
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 type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:	
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Proposed changes to make compliant or sound:	Proposed Alterations to Policy 12 and the Proposals Map Remove references from Policy 12 to the need for a 5-arm roundabout, and replace them simply with the word roundabout. Allow flexibility, both in the wording of Policy 12 and on the Proposals Map for open space to be located anywhere within site Pin045; alter the Proposals Map in accordance with Drawing 224/402, which accompanies this representation. Clarify the balance or priorities where there is a conflict between the provision of funding for the SWRR and provision of affordable housing within Pin045. Include reference to the potential for a convenience retail development of up to 500 sq m floorspace within site Pin045. Because we represent the land owner and developer, and would wish to take part in any discussion of the site at the Examination.
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Participate in Examination:	<input checked="" type="checkbox"/>
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Why wish to participate	Because we represent the land owner and developer, and would wish to take part in any discussion of the site at the Examination.
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We support the identification of Site Pin045 as a Preferred Housing Site in the draft Local Plan. The majority of the site identified as Pin045 is controlled by Ashley King Developments, who are committed to working with South Holland District Council and Lincolnshire County Council in ensuring the delivery of residential and retail development on this land, to enable the construction of the first part of the Spalding Western Relief Road (SWRR). Ashley King Developments control the main part of the site identified as Pin045 on the Proposals Map. The exception is an area of land at the north-eastern corner of the site, identified in the SHLAA 2017 as Pin020, which is accessed through Pin045. Ashley King Developments are committed to working with the owner of Pin020, and the Councils, to deliver the residential development proposed by the draft Local Plan, and to assist with the delivery of the first phase of the Spalding Western Relief Road (SWRR). Ashley King Developments and their consultants have already undertaken extensive work, investigating the potential design and delivery of this development. Technical reports have been prepared with regard to a number of issues, including archaeology, ecology, flood risk and drainage, and highways, and extensive dialogue has been undertaken with the relevant utilities providers and statutory consultees. They have also met with the representatives of South Holland Council and a Senior Project Leader for the Spalding Western Relief Road Steering Group (from Lincolnshire County Council), to discuss the delivery of the first phase of the SWRR. They are keen to progress an early planning application for the development of Pin045. Funding and Delivery The Council's Background Paper, A strategy for the delivery of further phases of the Spalding Western Relief Road and major housing growth in Spalding (hereafter referred to as the Background Paper) notes that Lincolnshire County Council identified at an early stage that the SWRR would need to be funded by developer contributions, given limits on public sector funding 1. However, the Background Paper also identifies that it is now recognised that an element of public sector funding will be required to deliver the SWRR2, and that other housing sites in Spalding must also make financial contributions. Previous emerging drafts of the Local Plan have been altered in recognition of the need to maximise the amount of residential development which can be accommodated, in order to maximise the potential for funding of the SWRR. We welcome each of

With respect to the representor's reference to the Background Paper titled 'A strategy for the delivery of further phases of the Spalding Western Relief Road (SWRR) and major housing growth in Spalding', it should be noted that paragraph 2.7 more accurately states:

'Therefore, it has for some time been recognised that other potential sources of funding for at least part of the SWRR, including various public-sector grants, need to be explored in order to increase the chances of delivering the SWRR in its entirety sooner rather than later.'

It is not accepted by the Spalding Western Relief Road Steering Group (which includes several representatives of the Local Highway Authority) that the SWRR should be developed to a lower specification (including a smaller roundabout at its junction with the Spalding Road) in order to save costs. Furthermore, both the South East Lincolnshire Infrastructure Delivery Plan and the South East Lincolnshire Whole Plan Viability Study (WPVS) have been informed by estimated SWRR costings based on the current specification, including the five-spur roundabout featured in Policy 12: Vernatts Sustainable Urban Extension (Policy 12). The WPVS makes clear that the Vernatts SUE is able to support between 20 and 25% affordable housing delivery and section 106 contributions of between £4,000 and £5,000 per dwelling. The appraisal includes a separate site-opening cost allowance of £350,000 per net HA (equivalent to £10K per dwelling contribution), (see WPVS para 6.7.5).

Notwithstanding the road specification, emerging Policy 30: Delivering the Spalding Transport Strategy (Policy 30) seeks to support the delivery of transport improvements across the town by seeking financial contributions from the relevant housing and other developers who will be generating traffic growth.

With respect to the representor's comments on "the land to the south of the 'indicative' route of the SWRR", it should be noted that the current specification of the SWRR does not allow for the possibility of an access onto the proposed Northern section lying between the five-spur roundabout and the bridge crossing of the Joint Line railway. Whilst the land to the south of the SWRR could be accessed directly off the B1356 Spalding

Further consideration of this matter will be necessary as part of the Examination.

Post Title: 5.3 Vernatts Sustainable Urban Extension

these recognitions, and believe that the current strategy for the delivery of the SWRR will benefit significantly from them. The Background Paper mentions that a developer interest, namely Ashley King Developments, initially approach the Council to discuss the possibility of constructing a mixed residential and commercial development on site Pin045 in early 2014. This was proposed to include a new bridge spanning the railway line. The Background Paper notes that this is the primary objective at this stage. The Background Paper notes at paragraph 4.2 that, despite early engagement in 2014, there has not so far been significant progress in agreeing how the development of site Pin045 could deliver the first phase of the SWRR. The Background Paper sets out the intended approach to the delivery of the northern part of the SWRR, which includes the provision of a 5-arm roundabout, and a bridge crossing the railway line. The final page of the Background Paper includes an image of the proposed road and 5-arm roundabout, as drawn by Lincolnshire County Council. It has emerged through our discussions with South Holland Council and the Spalding Western Relief Road Steering Group that the proposed design of the SWRR would allow for the provision of a road suitable for traffic travelling at around 50mph. The Council and Steering Group both believe that it is important for the SWRR to be built to a standard which will allow it to accommodate high-speed traffic. The implication of this is that the road will be substantially more expensive to build than may otherwise be the case. Lincolnshire County Council's estimate is that the 5-arm roundabout would cost in the region of £2 - 3 million, whilst the first leg of the road, spanning the railway, would cost around £20 million. If the road's design speed were a little slower, at 40mph, it would be possible to deliver it at a lower cost. A smaller 4-arm roundabout could be used, which would not need to incorporate the entrance to Enterprise Way, as the 5-arm version has been designed to do. By reducing the speed of the road, it could also be built to a less costly specification. It could also potentially be built with access roads along its length, rather than at the roundabout, possibly allowing for a 3-arm roundabout on Spalding Road. These alterations have the potential to result in savings of millions of pounds, and we believe that they should be considered further. In this regard, we welcome a recent change to the Proposals Map, in response to our previous representations, which identifies the line of the SWRR as being indicative at this stage; this will allow for discussions to continue over the design and route of the road. We are sympathetic to the desire to deliver the

Road, this is not viewed as desirable given the traffic along the Spalding Road and the proximity of the entrance to Spalding Hospital on the opposite side of the road. Also, given that the land in question abuts the Vernatt's Drain - and therefore is at some risk of flooding - and is presently largely undeveloped - and therefore constitutes a discernible edge to the built-up area of Spalding - it is considered that its promotion as recreational open space is the most appropriate use in the longer term.

Whilst the line of the Northern section of the SWRR on the Policies Map Inset No. 2 is viewed as 'Indicative', this description is to some extent dictated by the scale of the map base, but notwithstanding this description, it is not intended that there will be any significant deviation from this line as a basis for future master planning of this part of the Vernatts SUE.

Regardless of its size, it is not considered that Site Pin045 should be viewed as a suitable location for a retail store given the existence of retail facilities to the north, in Pinchbeck village, to the east, on the corner of Enterprise Way/Wardentree Lane, and to the south, in Spalding Town Centre. It is considered that a more appropriate location for a local centre serving the Vernatts SUE would be to the west of the Joint Line railway, where the majority of the housing is to be built.

Further consideration of the comments made will be informed by discussions relating to the comments made on Policy 12 by Broadgate Homes Ltd.

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best possible road. However, we question the need for a road of quite such a high speed. No matter the speed of the road, there remains the possibility of a build-up of traffic at its northern end, where it meets the existing streets of Spalding. We are also unsure why a lower capacity and cheaper road might not be acceptable, particularly given the need to justify the spending of public money, and the collection of contributions from a range of residential developments. This latter source of funding has the potential to impact on the viability of those developments, and the delivery of affordable housing. We can confirm that Ashley King Developments remain fully committed to the delivery of site Pin045 and the first phase of the SWRR, and we look forward to further constructive dialogue with the Council and Steering Group in the near future. Flexibility We believe that it would be useful for the Local Plan to build flexibility into its policy approach, to assist with the delivery of the first phase of the SWRR. As noted above, this could include flexibility of the form of the road and roundabout, to allow for alternative and cheaper designs to be considered. We believe that it should also allow for flexibility over the location of housing within the site, to allow the developer to maximise the value of the land, and so provide as much funding as possible to the new road. The draft Proposals Map identifies the land to the south of the indicative route of the SWRR as being recreational open space. It is not clear why this area must be kept open. If this land were to be included within the same housing allocation designation as the rest of site Pin045, it would allow greater flexibility for the Masterplan. As drafted, it appears that the Local Plan is attempting to design this element of the Masterplan at this early stage. The benefit of allowing flexibility over the provision of housing south of the line of the road is that the site may deliver more development. It will still be necessary to include open space within the site, to serve the new residents, and this may also be better located at least in part within the site, rather than on its periphery. We also note that, if the line of the SWRR is truly indicative, it is illogical to have fixed boundaries for housing and open space on either side of that line. If a different line were to be chosen in due course, this could require the Masterplan to contradict the Proposals Map's designations, in order to deliver a well designed development. It may also be necessary to explore alternative options for development which can raise sufficient funding to pay for the road. We have previously suggested that there is the potential for some retail development on site Pin045, but this option has not to date been favoured

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by the Council. A retail development would generate a higher level of funding than housing, and so could assist with the delivery of the SWRR. The Council's Retail Paper assumes that this would be comparison retail, which could indeed be accommodated. However, there is also the potential for a small-scale convenience retail outlet here, which could be limited to 500 sq m, in accordance with the draft Local Plan's general proposals on convenience retail. We also note that Policy 12 requires the provision of affordable housing on Pin045. We would welcome clarification of where the Council's priorities lie in this regard, should it be necessary to prioritise between funding for the SWRR and affordable housing.



**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number	533	Respondent Number:	1187	Comment Author:	Spalding and District Civic Society	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	12	Map Number:		<p>The policy is neither legally compliant nor sound (consistent with national policy). Paragraph 155 of the NPPF requires early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses .... A wide selection of the community should be proactively engaged .... As the abandonment of the open land between Spalding and Pinchbeck is a complete U-turn and appears now for the first time, there has of course been no engagement with the public on the issue, and the restrictive terms of the present consultation would seem to preclude any now. The Society is opposed on principle to one community being swallowed up by another and the consequent loss of identities.</p> <p>The urban sprawl proposed for north of the Vernatt's will create a sub-regional centre that is seriously lopsided, with the bulk of its housing west of the railway line and most of its civic, community and retail and retail facilities to the east council offices, surgeries, secondary schools, museum, swimming pool and sports centre, cinema, library, supermarkets, stall market, banks, tip, and so on. Throw in all the extra housing and the increased level-crossing down-times, and it is 21 recipe for town-centre gridlock.</p> <p>The proposed urban extension is the result of housing targets imposed on the local authorities. We note, however, that the figures are being contested as having been arrived at by a fundamentally flawed process, producing targets that are over-inflated and undeliverable (CPRE). As a result, the government was to begin consulting on a new methodology for calculating housing targets. Should a new methodology produce reduced targets for South East Lincolnshire, then the swallowing up of Pinchbeck would have been to no purpose and at the cost of urban sprawl and lost identity and open landscape.</p>	<p>The allocation of land resulting in the virtual coalescence of the two settlements is regarded as an inevitable consequence of priority being given by the Joint Strategic Planning Committee to securing the funding and delivery of the Northern section of the Spalding Western Relief Road.</p> <p>The calculation of the objectively-assessed needs for market and affordable housing in South East Lincolnshire has been undertaken in accordance with the Government's Planning Practice Guidance.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></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 checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	<p>We can only suggest the restoration of the separation between Spalding and Pinchbeck, pending the outcome of any new methodology for calculating housing targets.</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.3 Vernatts Sustainable Urban Extension**

Response Number	549	Respondent Number:	1669	Comment Author:	Pinchbeck Parish Council	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	12	Map Number:	2	The latest version of the local plan continues with the unsustainable 1000 cul-de-sac, ignoring Pinchbeck Parish Council (PPC) comments dated February and August 2016. We note that virtually all of the general public comments submitted mention the unsustainability of the SWRR delivery, validating PPC's concerns. No comment summarises the absurd situation better than this from Spalding Civic Society: As envisaged at present, the South Western Relief Road makes no sense. It would be like constructing highways up to both sides of the Humber and then not building the bridge. PPC specifically object to the Soundness of the local plan in line with Paragraph 182 of the National Planning Policy Framework: Positively Prepared: Economic growth will be harmed by the extra traffic flows on Warentree Lane and Enterprise Way. This could be avoided by building the middle part of the SWRR first and developing all the additional housing needed south of the Vernatts river. The plan does develop the town's Infrastructure in a joined-up, positive way causing total travel times to increase and average speeds to decrease, according to LCC traffic study. Insert Map 3 shows Pin 45 and Pin 24 as Land Safeguarded for Housing after 2036 but the plans text shows the intention to build on this land immediately. The plan is therefore not positively prepared and is misleading. Despite all the continued objections from PPC and Pinchbeck Residents, the three iterations of the plan have not changed, demonstrating that the consultation exercise is not a positive process but a fait accompli. Justified: Strategic Housing Land availability shows that all of the Mon pins (around Monks House Lane) have willing land owners, however one large land owner has been chosen instead north of the Vernatts (Pin 24). The direct impact of this policy is in the infill between Spalding and Pinchbeck, that is against the clear policy of PPC to retain this open space as much needed grade A agricultural land. Technical Note 3 (SWRR traffic impact) seeks to justify building north of the Vernatts but does not study the comparative benefits of the obvious option of developing the middle of the SWRR first. Effective: The plan is not effective as it does not develop the road infrastructure to service the housing proposed. Consistent with National Policy: The plan harms the Residential Amenity of Pinchbeck residents by removing green space and creating urban sprawl. The plan harms the Residential Amenity of Pinchbecks' residents by congesting the existing road	The allocation of land resulting in the virtual coalescence of the two settlements is regarded as an inevitable consequence of priority being given by the Joint Strategic Planning Committee to securing the funding and delivery of the Northern section of the Spalding Western Relief Road.	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

PPC request to speak at the Public Examination where we hope public pressure will deliver a sustainable local plan and not the traffic gridlock and urban sprawl that is proposed.

**Post Title:** 5.3 Vernatts Sustainable Urban Extension

network they currently use. Building the largest cul-de-sac in England is not sustainable development. The plan seeks to build 1000 houses on Pin045, surrounding the railway line which has recently been upgraded to carry additional freight traffic in a worse case scenario up to 24 hours a day. Similar applications near the railway have been refused recently due in part to noise from the railway line (Keton Nursies H14-0942-16),

<b>Response Number</b>	554	<b>Respondent Number:</b>	988	<b>Comment Author:</b>	Hume Planning Consultancy Ltd	<b>Client</b>	Broadgate Homes Ltd & Broadgate Builders (Spa	<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>		<b>Map Number:</b>		Broadgate support fully the expansion of the west of Spalding and the strategic allocations to the north.	The support is noted and welcomed.		No change to the Local Plan is required.		
<b>Site Allocation Number:</b>	Pin024								

**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: 5.3 Vernatts Sustainable Urban Extension**

Response Number	555	Respondent Number:	988	Comment Author:	Hume Planning Consultancy Ltd	Client	Broadgate Homes Ltd & Broadgate Builders (Spa)	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Broadgate support fully the expansion of the west of Spalding and the strategic allocations to the north.		Officer Comment:	The support is noted and welcomed.	
Policy Number:		Map Number:					Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:	Pin045								

**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: 5.4 Holbeach West Sustainable Urban Extension**

Response Number	364	Respondent Number:	2654	Comment Author:	Historic England	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	The historic environment is not acknowledged in the policy and, as such, its approach is not sound.		Officer Comment:	The comments provided by Historic England will be incorporated into Policy 13.	
Policy Number:	13	Map Number:					Officer Recommendation:	Further consideration of this matter will be necessary as part of the Examination.	
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></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 checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	<p>The drainage systems are part of the historic landscape character and, in order to address this issue, it is recommended that Part 4 i be amended to read as follows: green corridors alongside the New River Drain and other drains crossing the site to provide a well-connected green network for access and recreation, and for the enhancement of the historic environment In respect of this revision, if it is taken up by the Council, it is suggested that Para 5.4.2 could also be added to by adding and acknowledgment of the historic landscape features that form part of the sites local distinctiveness.</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.4 Holbeach West Sustainable Urban Extension**

Response Number	393	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:	13	Map Number:		We support the fact that a specific policy has been prepared to support the allocation of the Sustainable Urban Extension to the west of Holbeach. The policy and the submitted planning application reflect each other well, although the policy also includes sufficient flexibility to allow for changing circumstances. It allows for some flexibility in the rate and form of delivery, as will be necessary taking into account the long period over which development will take place.	Support for Policy 13 noted.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Soun <input checked="" type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> 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 checked="" type="checkbox"/>								
Why wish to participate									

**Post Title: 5.4 Holbeach West Sustainable Urban Extension**

Response Number	399	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:	13	Map Number:		We support the fact that a specific policy has been prepared to support the allocation of the Sustainable Urban Extension to the west of Holbeach. The policy and the submitted planning application reflect each other well, although the policy also includes sufficient flexibility to allow for changing circumstances. It allows for some flexibility in the rate and form of delivery, as will be necessary taking into account the long period over which development will take place.	Support for Policy 13 noted.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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: 5.4 Holbeach West Sustainable Urban Extension**

Response Number	412	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:	13	Map Number:		We support the fact that a specific policy has been prepared to support the allocation of the Sustainable Urban Extension to the west of Holbeach. The policy and the submitted planning application reflect each other well, although the policy also includes sufficient flexibility to allow for changing circumstances. It allows for some flexibility in the rate and form of delivery, as will be necessary taking into account the long period over which development will take place.	Support for Policy 13 noted.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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: 5.4 Holbeach West Sustainable Urban Extension**

Response Number	478	Respondent Number:	2075	Comment Author:	Anglian Water	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Anglian Water has no objection to the principle of development of the Holbeach East Sustainable Urban Extension. However it is recommended that Policy 13 should include reference to foul drainage as well as managing the risk of surface water and fluvial flooding.		Officer Comment:	Further consideration of this matter will be necessary as part of the Examination.	
Policy Number:	13	Map Number:			Given the size of the the SUE and the likelihood the site will be developed in phases it is reasonable to ensure that the foul drainage network can accommodate additional loads over the plan period.				
Site Allocation Number:					Add new criterion 7: 7. a foul drainage strategy for the site, and for each phase;				
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:				Add to paragraph 5.4.4, second sentence: : and other on-site infrastructure, such as the internal road network and the foul drainage system, should be designed with capacity to accomodate further development beyond 2036.			
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:	It is therefore recommended that Policy 13 should be amended as follows: 6. a flood management scheme for fluvial and surface water run off; 7. a foul drainage strategy for the site as a whole and for each phase;								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.5 Providing a Mix of Housing**

Response Number: 243 Respondent Number: 930 Comment Author: The Planning Bureau Ltd Client: McCarthy & Stone Retirement Lifestyles Ltd. Web Link:

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

Policy Number: 14 Map Number: Site Allocation Number: As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the aforementioned consultation insofar as it affects or relates to housing for the elderly. The National Planning Policy Framework stipulates that the planning system should be 'supporting strong, vibrant and healthy communities' and highlights the need to 'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community... such as... older people' (emphasis added). The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled "How should the needs for all types of housing be addressed? (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for "Housing for older people". This stipulates that "the need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing broken down by tenure and type (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important" (My emphasis). The recently published 'Housing White Paper: Fixing our broken housing market' clearly signals that greater consideration must be given to meeting the needs of older persons' in Local Plans stipulating that 'Offering older people a better choice of accommodation can

Meeting the housing need for an ageing population over the plan period is acknowledged. However these needs are complex and are closely related to the health care agenda and financing over which the Local Plan can have little influence. The Objectors refer to national trends for the formation of new households by the elderly but their evidence does not challenge or relate to the Strategic Housing Market Assessments for the plan area. The Assessments for both Boston and South Holland show that the household formation rates are not typical of national trends and actually decline significantly in comparison for the elderly. Proportionally there is little local evidence to suggest that specialist housing for the elderly requires specific planning policy tools to assist providers or, indeed any evidence that such providers are unable to bring forward development on an equal footing with other developers.

The Objections to Policy 14 are not accepted. Policy 14 is drawn up to assist in the provision of housing to meet the vast majority of housing needs that will occur in the plan period. The terms of the policy do allow exemptions to be made by specialist housing providers and the supporting text provides, as an example, that sheltered housing might be one such exemption. Policy 16 (Rural Exceptions Sites) might also provide a policy framework whereby specialist housing for the elderly could come forward.

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: 5.5 Providing a Mix of Housing

help them to live independently for longer and help reduce costs to the social care and health systems. We have already put in place a framework linking planning policy and building regulations to improve delivery of accessible housing. To ensure that there is more consistent delivery of accessible housing, the Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people. Guidance produced under this duty will place clearer expectations about planning to meet the needs of older people, including supporting the development of such homes near local services<sup>82</sup>. It will also set a clear expectation that all planning authorities should set policies using the Optional Building Regulations to bring forward an adequate supply of accessible housing to meet local need. In addition, we will explore ways to stimulate the market to deliver new homes for older people. (Para 4.42) (My emphasis). The "What Homes Where Toolkit" developed by the Home Builders Federation uses statistical data and projections from the Office of National Statistics (ONS) and the Department for Communities and Local Government (DCLG) to provide useful data on current and future housing needs. The table below has been replicated from the toolkit and shows the projected change to the demographic profile of the region between 2008 and 2033: [table provided by email but cannot be uploaded]

In line with the rest of the country, this toolkit demonstrates that the demographic profile of the Region is projected to age. The proportion of the population aged 60 and over is projected to increase from 28% to 36.7% and 30% to 38% between 2008 and 2033 for Boston and South Holland respectively. The largest proportional increases in the older population are expected to be of the frail elderly, those aged 75 and over, who are more likely to require specialist care and accommodation provided by Extra Care accommodation. It is therefore clear that the provision of adequate support and accommodation for the increasingly ageing demographic profile of the Region is a significant challenge and, unless properly planned for, there is likely to be a serious shortfall in specialist accommodation for the older population, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy and Stone, will therefore have a vital role in meeting the areas housing needs. We are therefore

**Post Title:** 5.5 Providing a Mix of Housing

concerned over the very limited reference to the needs of older people in the Local Plan. Given the markedly ageing demographic profile of the area in question, meeting the needs of older people should be a priority and reflected in emerging planning policy. Policy 14: Providing 3 Mix of Housing We note and appreciate the Council's intention to create balanced communities and that as part of this there is a need to deliver housing in accordance with the housing mix. Providing a specific housing mix is however counterintuitive for specialist housing developments such as McCarthy & Stone. The ethos of this form of specialist older persons' development is to provide suitable accommodation that provides comfort, security and the ability to manage independently to a greater extent. Central to maintaining their independence is the provision of a home that is both smaller and easier to maintain than their existing properties and which is well located in terms of local amenities. To this end, McCarthy & Stone overwhelmingly provide flatted developments located on (comparatively) small, previously developed windfall sites close to existing services and consequentially there is rarely sufficient surplus land available to provide alternative forms of accommodation on our development sites. A benefit of McCarthy & Stone retirement developments and other forms of specialist development is their propensity of them to free up existing under occupied housing stock in the area and catalyse housing chains. A report carried out by Shelter (appended) in 2012 calculated that nationally if the 20% of older households which are currently under-occupied were to downsize, around 840,000 family sized homes would be released, including 760,000 in the owner occupied sector. McCarthy & Stone find on average around 60% of occupants move into a McCarthy & Stone scheme from within a five mile radius of the site. Specialist housing developments will therefore contribute towards increasing the available stock of housing by freeing up existing family housing in the City. As the wording of Policy 14 do not however make provision for an exemption for specialist forms of older persons' accommodation. This effectively means that the Council is: - Substituting the delivery of one housing need (older persons' accommodation) for another (family housing) - Not taking into account the contribution that older persons' housing makes towards freeing up existing family housing stock into the City. Similarly worded policies detailing development type and bedroom mix in other Local Planning Authorities are causing pressing difficulties for McCarthy & Stone, with the Development Management teams often hamstrung

**Post Title: 5.5 Providing a Mix of Housing**

by policy requirements that are not feasible for specialist housing and policy wording which is not sufficiently flexible to function effectively. We respectfully request that the Council uses the Local Plan review to adjust the wording of this policy so that it specifically exempts specialist forms of development from adhering to prescriptive housing mix requirements. [Please note that our system does not allow us to edit text to bold or italic when inputting representations that have been received via email]

<b>Response Number</b>	262	<b>Respondent Number:</b>	2138	<b>Comment Author:</b>	Andrew Burling	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>	0.6	<b>Table/Figure:</b>		<b>Comment Content</b>		<b>Officer Comment:</b>		<b>Officer Recommendation:</b>	
<b>Policy Number:</b>	14	<b>Map Number:</b>		<p>We support the plans proposals to identify a mix of property types for the provision of Affordable Housing within the plan areas however it is not appropriate for the local authority to determine a fixed mix of dwelling types and sizes for the market element of specific development sites. The mix should be determined through the planning application process for each site that comes forward based on evidence from the applicant. The Boston SHMA dated July 2015 comments in chapter 6.2 that 'it is considered that it is appropriate through the planning system to seek to influence the balance of types and sizes of market housing through a mix of sites allocated for development, rather than specific policies relating to the proportion of homes of different sizes which are then applied to specific sites' That approach is implicit in the NPPF. In addition the inclusion of minimum space standards will have a negative affect on viability and the overall delivery of Affordable Housing and other Planning Gain matters.</p>	<p>Comment – Policy 14 does not apply the policy to specific sites. It is set out to help meet the housing needs of the plan area (as evidenced in the SHMA's) and is flexible in terms of the size of dwellings that a site might accommodate and also allows developers to justify different mixes. It is not considered that leaving the mix of housing on any one site to be evidenced and determined entirely by the applicant at the planning application stage provides any degree of surety that the housing needs of the area will be met. There is no evidence presented by the Objector that providing a mix of housing will make development unviable. The minimum space standards are supported by national policy as the default position where development is proposed that falls beneath nationally acceptable standards.</p>	<p>No change to the Local Plan is required.</p>			
<b>Site Allocation Number:</b>									
<p><b>Do you consider that this part of the Local Plan is</b></p> <p><b>Legally Compliant</b> <input checked="" type="checkbox"/></p> <p><b>Sound</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p><b>Positively Prepared</b> <input type="checkbox"/></p> <p><b>Justified</b> <input checked="" type="checkbox"/></p> <p><b>Effective</b> <input checked="" type="checkbox"/></p> <p><b>Consistent with national policy</b> <input checked="" type="checkbox"/></p>							
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>	<p>The prescriptive mix for the market element of this policy should be omitted along with the minimum space standards.</p>								
<b>Participate in Examination:</b>	<input checked="" type="checkbox"/>								
<b>Why wish to participate</b>	<p>Discuss why the Local Authority believes it should apply blanket policy for mix and property size across all developments where such prescriptive policies will have a negative impact on the overall delivery of new homes, affordable housing and planning gain.</p>								

**Post Title: 5.5 Providing a Mix of Housing**

Response Number	416	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Whilst it is acknowledged that the Local Plan should seek to secure a mix of properties, it is believed that as drafted policy 5.5 is too prescriptive and unworkable. It is also a concern that the Local Plan is seeking to impose minimum space standards which could adversely affect viability. The housing market will effectively ensure suitable housing standards are achieved with local Plan intervention on this matter not to be felt justified.		Officer Comment:	Policy 14 is provided as it expresses particular and evidenced outcomes in the SHMA's. These are not only provided to give developers and decision makers some guidelines as to how housing needs might be met but also to give developers a lead on the design of their schemes. The Policy allows flexibility to reflect the varying needs in terms of settlements, sites and viability.  The reference to national minimum space standards will only be a consideration where developers propose substandard developments without providing justification.  The Local Plan does not take a prescriptive approach on density, layout or standards of accommodation and welcomes interactive dialogue with developers on delivering good standards of design and good quality homes. Policy 14 in no way inhibits such dialogue or good design being forthcoming.	
Policy Number:	14	Map Number:						Officer Recommendation:	No change to the Local Plan is required.
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input checked="" type="checkbox"/> Justified <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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate	As a significant housebuilder in Boston we would welcome the chance to be part of any debate as to this policy								

**Post Title: 5.5 Providing a Mix of Housing**

Response Number	440	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:	14	Map Number:	
Site Allocation Number:			

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

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:**

Positively Prepared	<input 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:	
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Proposed changes to make compliant or sound:	
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Participate in Examination:	<input type="checkbox"/>
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Why wish to participate	
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The proposals in Policy 14 for sites of 10 or more dwellings is overly prescriptive on the mix of both market and affordable housing. It is suggested that the word "size" is deleted from the policy. The text in para 5.5.2 is not clear. The Councils should clarify the meaning of "Outside Building Regulations LPA will advise developers to, at least, meet the minimum space standards in national guidance". It is the HBF's opinion that this paragraph is deleted. The Written Ministerial Statement dated 25th March 2015 confirms that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". If the Councils wish to adopt the nationally described space standard the Councils should only do so by applying the criteria set out in the NPPG. The NPPG sets out that "Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas need, viability and timing" (ID: 56-020-20150327) :- Need - It is incumbent on the Councils to provide a local assessment evidencing the specific case for South East Lincolnshire which justifies the inclusion of the nationally described space standard as a Joint Local Plan policy. If it had been the Government's intention that generic statements justified adoption of the nationally described space standards then the logical solution would have been to incorporate the standards as mandatory via the Building Regulations which the Government has not done. The nationally described space standards should only be introduced on a "need to have" rather than a "nice to have" basis. The identification of a need for the nationally described space standard must be more than simply stating that in Some cases the standard has not been met it should identify the harm caused or may be caused in the future. Viability - The impact on viability should be considered in particular an assessment of the cumulative impact of policy burdens. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Councils cannot simply expect home buyers to absorb extra costs in a Joint Local Plan area where there exists severe affordability pressures. There is also an impact of larger dwellings on land supply. The requirement for the nationally described space standard would reduce site

Policy 14 is provided as it expresses particular and evidenced outcomes in the SHMA's. These are not only provided to give developers and decision makers some guidelines as to how housing needs might be met but also to give developers a lead on the design of their schemes. The Policy allows flexibility to reflect the varying needs in terms of settlements, sites and viability.

The reference to national minimum space standards will only be a consideration where developers propose substandard developments without providing justification.

The Local Plan does not take a prescriptive approach on density, layout or standards of accommodation and welcomes interactive dialogue with developers on delivering good standards of design and good quality homes. Policy 14 in no way inhibits such dialogue or good design being forthcoming.

No change to the Local Plan is required.

**Post Title:** 5.5 Providing a Mix of Housing

yields or the number of units on a site. Therefore the amount of land needed to achieve the same number of units must be increased. The efficient use of land is less because development densities have been decreased. At the same time the infrastructure and regulatory burden on fewer units per site intensifies the challenge of meeting residual land values which determines whether or not land is released for development by a willing landowner especially in lower value areas and on brownfield sites. It may also undermine delivery of affordable housing at the same time as pushing additional families into affordable housing need because they can no longer afford to buy a nationally described space standard compliant home. The Councils should undertake an assessment of these impacts. Timing - The Councils should take into consideration any adverse effects on delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be predicated on market affordability at relevant price points of units and maximising absorption rates. An adverse impact on the affordability of starter home 1 first time buyer products may translate into reduced or slower delivery rates. As a consequence the Councils should put forward proposals for transitional arrangements. The land deals underpinning the majority of identified sites will have been secured prior to any proposed introduction of nationally described space standards. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The nationally described space standards should not be applied to any outline or detailed approval prior to the specified date and any reserved matters applications should not be subject to the nationally described space standards. If the Councils modify Policies 14 and 15 the HBF may make further comments in Hearing Statements and orally at the Examination Hearing Sessions.



**Post Title: 5.5 Providing a Mix of Housing**

Response Number	452	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:	14	Map Number:		<p>Policy 14 seeks to secure a range of housing sizes to meet need. Whilst this generic mix is informed by a Housing Market Assessment it is considered to be too prescriptive. In an area where housing delivery must be encouraged it is contended that housebuilders, with a product that must be tailored to known market demand, should be given maximum flexibility with the choice of housing sizes on a site by site basis. There is more likely to be a justification for imposing a more prescriptive mix on larger strategic sites and it is suggested that the threshold set out in Policy 14 is increased from 10 to 100 dwellings.</p> <p>There should not be an affordable housing target range at all since the Registered Provider can negotiate on a site by site basis as part of an Affordable Housing Scheme linked to a S106.</p>	<p>Policy 14 is provided as it expresses particular and evidenced outcomes in the SHMA's. These are not only provided to give developers and decision makers some guidelines as to how housing needs might be met but also to give developers a lead on the design of their schemes. The Policy allows flexibility to reflect the varying needs in terms of settlements, sites and viability.</p> <p>The affordable housing target is seen as as useful to the market housing developer as well as the Registered Provider.</p> <p>The reference to national minimum space standards will only be a consideration where developers propose substandard developments without providing justification.</p> <p>The Local Plan does not take a prescriptive approach on density, layout or standards of accommodation and welcomes interactive dialogue with developers on delivering good standards of design and good quality homes. Policy 14 in no way inhibits such dialogue or good design being forthcoming.</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:									
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	Because of Broadgate's experience of housing delivery and the importance of the provision of strategic infrastructure to bring forward the time-scales for housing development.								

**Post Title: 5.5 Providing a Mix of Housing**

Response Number	516	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Whilst we understand the general benefit in having some guidance on the mix of housing to be provided, particularly from the point of view of the affordable housing element, this policy needs to be more flexible. As drafted, it would require future housing provision to conform to a prescriptive mix for the next 20 years. It would be helpful if the Policy could include a mechanism by which it might be updated over time, to respond to changing housing needs. It would also be appropriate to have a greater degree of flexibility in the range of provision required, to allow developers to vary the mix of housing they offer on the basis of their own local market research into the demand for housing. Demand is an important factor of housing need, as noted in paragraph 159 of the NPPF. It is not appropriate for a policy like this to be excessively prescriptive, as this would remove the ability to respond to changing market requirements over time, and it may lead to households being accommodated in housing which is not suitable for them. This would effectively undermine the purpose of Policy 14. The inflexibility of the policy may also slow or stall the delivery of housing, where a developer was otherwise required to provide a type of housing which did not for with market demand. As drafted, the policy has no regard for the commercial realities which developers must live with.		Officer Comment:	The Policy and Local Plan is committed to a comprehensive programme of monitoring which will lead to amendment and updating.	
Policy Number:	14	Map Number:		Officer Recommendation:	No change to the Local Plan is required.				
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input checked="" type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> 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 comments about flexibility, which are included in the supporting text, should therefore also be reflected in the Policy's text. Supporting text should not be confused with policy text, as the two have a different function.								
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: 5.6 Affordable Housing**

Response Number	263	Respondent Number:	2138	Comment Author:	Andrew Burling	Client		Web Link	
Paragraph Number:	5.6	Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	15	Map Number:		The assessment for the level of Affordable Housing that can be provided is based on the flawed PBA Whole Plan Viability Assessment commented upon in chapter 3.7 Policy 7. The same arguments apply to the level of Affordable Housing leading the Local Authority to increase its policy from 15% to 20% in the Boston area.	The WPVA sets out an overview of viability for the plan area. The formation of policy with regard to Affordable Housing considers this overview and other evidence (e.g. in respect of Affordable Housing need in the SHMA's). The 15% stated in the January 2016 Consultation draft of the Local Plan was based upon a WPVA that was a working draft. The WPVA now includes evidence that viability is more flexible and particularly with regard to flood risk mitigation. The working draft WPVA put forward that flood mitigation was an abnormal development cost (i.e. not a cost that a developer would use to negotiate the cost of buying land) it is now considered that this approach was not sound. Flood mitigation has been a national policy expectation for fifteen or more years.	No change to the Local Plan is required.			
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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:	The viability assessment should be re-run to establish the correct level of Affordable Housing that can be justified.								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	Discuss the robustness of the PBA viability assessment in determining the level of Affordable Housing and associated Planning Gain.								

**Post Title: 5.6 Affordable Housing**

Response Number	421	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	5.6	Map Number:		We are concerned that the 20% provision of affordable housing in the Boston area will adversely affect viability, particularly on the Sustainable Urban Extensions such as Q2. Other policy requirements such as the potential contributions to infrastructure and flood risk mitigation will put considerable pressure on viability and this needs to be recognised in this policy. The text to the policy indicates flexibility in terms of the tenures to be sought which is welcomed. We also believe that the Rural Exceptions Policy at Section 5.7 should be extended to include larger settlements to reflect the need for innovative solutions to help meet the affordable housing need identified.	The delivery of affordable housing is clearly linked, by the Policy and Plan as a whole to the assessment of viability and need for other infrastructure. As the Objector notes the Policy is also flexible in its terms to increase the prospect of delivery especially where the viability might be marginal.  The Rural Exceptions Policy is not specific to any size of settlement but it is evidence based. Where a larger settlement offers a broad range of development opportunities it may be harder to evidence why a particular housing need cannot be met either within the settlement boundary or on an available allocated site.  The provision of affordable homes are part of the overall housing need, not an additional consideration, and clearly these can be delivered on specific affordable housing developments or integral to a market housing scheme.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input 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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate	As a major housing developer in the area including the provision of a number of affordable housing schemes we would welcome inclusion on any debate about the affordable housing policies in this Local Plan								

**Post Title: 5.6 Affordable Housing**

Response Number	441	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:	15	Map Number:	
Site Allocation Number:			

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

Legally Compliant	<input 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:**

Positively Prepared	<input type="checkbox"/>
Justified	<input checked="" type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with national policy	<input checked="" type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:	
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Proposed changes to make compliant or sound:	
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Participate in Examination:	<input checked="" type="checkbox"/>
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Why wish to participate	
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The use of 100 dwellings per annum affordable housing need for Boston in Policy 15 is misleading. The Councils latest evidence shows net affordable housing need of 263 dwellings per annum (Figure 4.7). The Councils evidence also shows that affordable housing need in Boston is Worsening with an increase of +13 dwellings per annum since the previous SHMA Report in 2015. It is inappropriate to lower the affordable housing need figure because some households in need live in the private rented sector. The affordable housing figure for Boston is 263 affordable dwellings per annum representing 89% of its OAHN figure rather than 33% stated in Policy 15. Therefore there is an argument for increasing total housing figures included in the Local Plan if it could help deliver the required number of affordable homes as set out in the NPPG (ID 2a-029-20140306). This potential under-estimation is illustrated by the Councils alternative OAHN using the proposed standard methodology recommended in the Local Plans Expert Group (LPEG) Report contained in Appendix 3 of the Councils latest evidence which shows a higher OAHN of 902 dwellings per annum. This higher OAHN calculation comprises :- Demographic starting point of 745 dwellings per annum (448 dwellings in South Holland (+15 dwellings per annum above Councils OAHN) and 297 dwellings per annum in Boston (+16 dwellings per annum above Councils OAHN)); - Market signals adjustment to 820 dwellings per annum (493 dwellings per annum in South Holland (+48 dwellings per annum above Councils OAHN) and 327 dwellings per annum (+32 dwellings per annum above Councils OAHN) in Boston); - Affordable housing delivery adjustment to 902 dwellings per annum (542 dwellings per annum in South Holland (+97 dwellings per annum above Councils OAHN) and 360 dwellings per annum (+65 dwellings per annum above Councils OAHN) in Boston). The LPEG calculation excludes any adjustments for jobs led forecasts but as the overall figure is higher it is unlikely to restrict future economic growth. Policy 15 proposes on sites of 11 or more dwellings 20% affordable housing provision in Boston and 25% in South Holland subject to viability. If the South East Lincolnshire Joint Local Plan is to be compliant with the NPPF development should not be subject to such a scale of obligations and policy burdens that viability is threatened (paras 173 & 174). The residual land value model is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on

The affordable housing assessment for Boston Borough is more complex than the Objector has sought to assess. The identified need of 100 pa is evidenced in the Boston Borough SHMA.

How this interpretation of the OAN by the Objector is then taken forward as a basis for reassessing the whole OAN is therefore based upon evidence that the plan making authority does not support.

It is asserted (by the plan making authority )that bringing about the development of sites, supporting existing and active developers and prompting the quicker release of the allocated sites currently without developer commitment are more important than substantially adding to the stock of potential sites.

It is acknowledged that the authority needs to provide further guidance on infrastructure delivery and priorities.

No change to the Local Plan is required.

Post Title: 5.6 Affordable Housing

viability. Therefore it is important for the Councils to understand and test the influence of all inputs on the residual land value as this determines whether or not land is released for development. The Harman Report highlighted that "What ultimately matters for housing delivery is whether the value received by land owners is sufficient to persuade him or her to sell their land for development". The Councils latest viability testing evidence is set out in Whole Plan Viability Report dated January 2017 by PBA. However the evidence is difficult to decipher giving the impression that it is incomplete and inconclusive. The Report demonstrates that viability varies between Boston and South Holland so different policy approaches are necessary. The findings show that policy trade-offs are required between affordable housing provision and infrastructure as delivery of Spalding Western Relief Road and Boston Distributor Road are priorities. The Report sets out required Section 106 contributions for the SUEs and generic sites in South Holland and Boston. However the Tables in the Appendices do not show any results based on both the required S106 payments and the proposed percentage of affordable housing provision. Table B19 for South Holland shows 25% affordable housing provision but S106 payments of only £4,000 for a generic site (£500 £1,000 less than the required S106 sum) and £3,000 for a SUE (£1,000 - £2,000 less than the required S106 sum). Furthermore it is not clear if the density of 35 dwellings per hectare is compliant with the housing mix and house size requirements of Policy 14. Table B17 for Boston also shows lower S106 payment sums. Nevertheless even with these assumption anomalies the evidence shows that brownfield sites in South Holland are unviable whilst rural greenfield sites, large brownfield sites, apartment developments and SUES in Boston are unviable. The Councils should be mindful that the cumulative burden of policy requirements are not set so high that the majority of sites are only deliverable if these sites are routinely rather than occasionally negotiated on the grounds of viability. In Policy 15 the proposed affordable housing tenure mix of 75% affordable rent in Boston / 70% affordable rent in South Holland and 25% intermediate in Boston / 30% intermediate in South Holland is prescriptive. The Councils should consider the Government's proposals for Starter Homes as set out in the Housing White Paper whereby the Councils may deliver Starter Homes as part of a mixed package of affordable housing alongside other affordable home ownership and rented tenures determining the appropriate level of provision for the locality in agreement with developers. The latest Report

**Post Title: 5.6 Affordable Housing**

identified potential demand for 126 starter homes per annum in South Holland and 90 starter homes per annum in Boston. There is also concern that the floor space assumptions (para 4.3.15) are not the nationally described space standards. Any impact from the housing mix of Policy 14 on the density assumption of 35 dwellings per hectare should be taken into account in the Councils viability testing. If the Councils modify Policies 14 and 15 the HBF may make further comments in Hearing Statements and orally at the Examination Hearing Sessions.

<b>Response Number</b>	453	<b>Respondent Number:</b>	988	<b>Comment Author:</b>	Hume Planning Consultancy Ltd	<b>Client</b>	Broadgate Homes Ltd & Broadgate Builders (Spa	<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>				<b>Officer Recommendation:</b>
<b>Policy Number:</b>	15	<b>Map Number:</b>		<p>This policy stipulates a requirement for 20% affordable on sites in the Boston sub area and 25% in the South Holland sub area. It is recognised that paragraph 3.7.11 acknowledges that financial viability is fundamentally linked to housing delivery and this will be assessed individually via the development management process which is Consistent with national guidance.</p> <p>The LPA's spatial decision making has been to focus on urban extensions at the two largest settlements. The full cost of mitigating flood risk; addressing the HRA requirements, surface water drainage and need for a planned urban extension which achieves a high quality of place making whilst securing a sufficient critical mass for the housing to deliver infrastructure, including the SWRR, is not known at this point. For this reason Broadgate favour a more pragmatic and precautionary approach to affordable housing provision which will serve to encourage housing delivery by the development industry during the plan period.</p> <p>Broadgate therefore object to Policy 15 of the Plan. Instead, Broadgate seek the replacement of the stated wider generic policy percentages for affordable with 15% for the Boston sub area and 20% for the Holland Park sub area. These percentage targets may need to be adjusted on a case-by-case basis, depending upon the viability of each Scheme, and the level of contribution requested for the SWRR. It is relevant that at the current time, the policy targets of 33% and 40% are thwarting development, and stifling investment, and it is critical that this is addressed in order to achieve an increase in housing construction.</p>	<p>There is no current planning policy requirement for 40% affordable housing provision in either Boston Borough or South Holland District.</p> <p>The Whole Plan Viability Study suggests that the Holland Park SUE is able to support between 20 and 25% affordable housing delivery and section 106 contributions of upto £5,000 per dwelling. (see WPVS para 6.7.5).</p>		<p>No change to the Local Plan is required.</p>		
<b>Site Allocation Number:</b>		<p><i>Do you consider that this part of the Local Plan is</i></p> <p><b>Legally Compliant</b> <input checked="" type="checkbox"/></p> <p><b>Sound</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>			<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p><b>Positively Prepared</b> <input checked="" type="checkbox"/></p> <p><b>Justified</b> <input type="checkbox"/></p> <p><b>Effective</b> <input checked="" type="checkbox"/></p> <p><b>Consistent with national policy</b> <input type="checkbox"/></p>				
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input checked="" type="checkbox"/>								
<b>Why wish to participate</b>	Because of Broadgate's experience of housing delivery and the importance of the provision of strategic infrastructure to bring forward the time-scales for housing development.								

**Post Title: 5.6 Affordable Housing**

<b>Response Number</b>	537	<b>Respondent Number:</b>	932	<b>Comment Author:</b>	DLP (Planning) Ltd	<b>Client</b>	Mr R Hardy and Richard Hardy (Fishtoft)	<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	15	<b>Map Number:</b>		<p>Policy 15 states that In Boston Borough the need for about 100 new affordable dwellings per annum has been identified equating to one third of the overall annual housing need. As noted above, the reference to a requirement for 100 affordable dwellings per annum is Boston is considered to be inaccurate. The Council's SHMA (July 2015) identified a net affordable housing need of 250 dwellings per annum. The Council's evidence shows that the affordable housing need in Boston is worsening with the SHMA update 2017 suggesting that there is a net affordable housing need for 263 dwellings per annum (+13 dwellings since 2015). The affordable housing figure represents some 89% of the housing requirement in the SHMA update for Boston. As advocated in the PPG (paragraph 029 Reference ID: 2a-029-20140306) an increase in the total housing figures included in the Local Plan should therefore be considered as it could help deliver the required number of affordable homes. In this regard SPRU has produced a report on the Objectively Assessed Housing Need (OAN) in Boston Borough and South Holland District. The report provides evidence to suggest that for Boston there should be an increase of 10% in response to the need for affordable housing. This uplift is considered necessary in order to ensure that the Plan is positively prepared to meet objectively assess development needs and consistent with national policy. If not the plan is considered to be unsound.</p>	<p>The affordable housing assessment for Boston Borough is more complex than the Objector has sought to assess. The identified need of 100 pa is evidenced in the Boston Borough SHMA.</p> <p>How this interpretation of the OAN by the Objector is then taken forward as a basis for reassessing the whole OAN is therefore based upon evidence that the plan making authority does not support.</p> <p>It is asserted (by the plan making authority) that bringing about the development of sites, supporting existing and active developers and prompting the quicker release of the allocated sites currently without developer commitment are more important than substantially adding to the stock of potential sites.</p>		<p>No change to the Local Plan is required.</p>		
<b>Site Allocation Number:</b>									
<p><b>Do you consider that this part of the Local Plan is</b></p> <p><b>Legally Compliant</b> <input checked="" type="checkbox"/></p> <p><b>Sound</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p><b>Positively Prepared</b> <input checked="" type="checkbox"/></p> <p><b>Justified</b> <input type="checkbox"/></p> <p><b>Effective</b> <input type="checkbox"/></p> <p><b>Consistent with national policy</b> <input checked="" type="checkbox"/></p>							
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>	<p>An uplift of 10% on the Borough Council's housing requirement is considered necessary as it would help deliver the required number of affordable homes identified in the evidence base.</p>								
<b>Participate in Examination:</b>	<p><input checked="" type="checkbox"/></p>								
<b>Why wish to participate</b>	<p>On behalf of Mr R Hardy and Richard Hardy (Fishtoft) DLP (Planning) Ltd has submitted comprehensive representations to the R.19 consultation which set out in detail that the Plan is both unsound and not legally compliant. We consider that it is appropriate for DLP (Planning) and the Strategic Planning Research Unit (SPRU) to represent Mr R Hardy and Richard Hardy (Fishtoft) at hearing sessions during the examination of the plan to re-state and expand on these written representations and participate in the discussion.</p>								



**Post Title: 5.7 Rural Exception Sites**

<b>Response Number</b>	517	<b>Respondent Number:</b>	2342	<b>Comment Author:</b>	Ashley King Developments	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	16	<b>Map Number:</b>		<p>We support the recognition within Policy 16 that affordable housing on rural exception sites is likely to require an element of enabling development, in the form of market housing. This approach is consistent with paragraph 54 of the NPPF.</p> <p>We also support the breadth of housing which this policy could relate to, allowing for under- provision in any particular type of housing to be addressed in a pragmatic way. This will make the Local Plan more flexible, and better able to respond to changing needs over the plan period.</p> <p>Given our comments on Policy 15 [located with Policy 10 comments], concerning affordable housing, it may be that a development of 50% market and 50% affordable housing may still not be viable. In this instance, it would be helpful if Policy 16 could allow greater flexibility, for a higher proportion of market housing to be provided, in order to enable the delivery of affordable housing. This is particularly important given the high level of need for affordable housing, and the constrained housing target which the draft Local Plan proposed. We suggest that any policy wording could refer to such an approach being considered on a case-by-case basis, with regard to the proportion of affordable housing proposed, and the level of need.</p>	<p>Policy 16 as an enabling Policy to deliver non-market housing will have a multitude of site, development and viability scenarios. These must be evidence lead.</p> <p>That being said the Objector seeks a greater degree of flexibility in the proportion of affordable housing to market housing which would seem to lose the entire focus and priority of the Policy. Many examples of the development of affordable housing schemes have been delivered in the plan area with no market housing subsidising the affordable housing provision.</p>		<p>No change to the Local Plan is required.</p>		
<b>Site Allocation Number:</b>									
<p><b>Do you consider that this part of the Local Plan is</b></p> <p><b>Legally Compliant</b> <input checked="" type="checkbox"/></p> <p><b>Sound</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p><b>Positively Prepared</b> <input checked="" type="checkbox"/></p> <p><b>Justified</b> <input checked="" type="checkbox"/></p> <p><b>Effective</b> <input checked="" type="checkbox"/></p> <p><b>Consistent with national policy</b> <input type="checkbox"/></p>							
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input checked="" type="checkbox"/>								
<b>Why wish to participate</b>	Because the issues raised in this representation would be best explained to the Inspector in the format of a round-table discussion.								

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	227	Respondent Number:	2764	Comment Author:	Mr & Mrs C.J.K Bryant	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		Re: Cranesgate North/Hurdletree Bank, Whaplode St Catherines Please find attached photo copy of phase one report findings on the issue of possible contamination of land [this has been submitted as a paper copy]. As stated in section 10.0 (Framework for Assessment of Contamination) for the land to be classified as contaminated, all the elements must be present. If one or more are absent there can be no significant risk of contamination. As stated in section 11.0, contaminant sources: on site sources (no identified) Please find attached Section 14.0 Preliminary Conceptual Site Model	The merits of this site were examined in the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017). The Topic Paper concluded that the site is available, achievable, and is suitable in all respects other than the fact that it is identified as possible filled or contaminated ground, i.e. there is potential that past uses of the site may endanger the health of occupants.  To deal with this issue, the objectors have submitted a 'Desktop Study and Risk Assessment Report'. Unfortunately, however, South Holland District Council's Environmental Health Team indicate that the document is incomplete. Consequently, there is currently no definitive evidence that the site is safe for use for residential purposes.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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:	All we wish is that the land mentioned before is allocated to us to be used as our home, by you. As this was almost accepted to be allocated by you until the issue of part of the land was used as a refuse tip was brought up on a previous meeting. This issue of (possible contamination arised), which we now feel has been clarified by the phase one report findings enclosed. At a previous meeting with us and Simon Eldred (Forward Planning Officer) and Jeanette Reith (Team Leader Environmental Protection) it was agreed that the only possible reason would be the issue of a build up of gasses which would not affect us as we have no intention of building as brick buildings, only to live in a static/caravan (on chasis) wheels.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	238	Respondent Number:	2778	Comment Author:	Mr G Laming	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>I am writing to state my objection in the strongest possible terms to the possibility of establishing a site for Gypsies, Travellers and Travelling Showmen next to two fields north and south of the proposed site (sheet numbers TF3220 and TF3221). I have learned from Mr David Gedney that without an existing settlement there is no chance of any development being approved. I am worried that on such a proposed site, approval for a small number of vehicles may grow out of control onto the rest of the seven acre site. This Greenfield acreage was bought for the purpose of keeping a horse.</p> <p>My farm grows contract vegetables, and I fear for the safety of these crops.</p> <p>The travellers site at Holbeach costs taxpayers serious money and I understand it is little used. Is there really a need for an additional one in the same area?</p>		Officer Comment:	<p>A planning application for the development of a greater area of land than that allocated would be judged against the provisions of the Local Plan and national guidance and, only if the proposal was well-evidenced and complied with local and national policy, would permission be granted.</p> <p>There is no evidence to suggest that the development of this site as a residential Gypsy/Traveller site for four households would threaten the security of crops growing in nearby fields.</p> <p>The Boston and South Holland Gypsy and Traveller Accommodation Assessment (November 2016) identifies a need for at least 4 residential pitches in South Holland.</p>	
Policy Number:	17	Map Number:		Officer Recommendation:	No change to the Local Plan is required.				
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	242	Respondent Number:	1046	Comment Author:	The Rt Hon John Hayes CBE MP (So	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:	
Policy Number:	17	Map Number:		<p>I have recently been contacted by a number of constituents who are extremely concerned about the inclusion of this site in the draft South East Lincolnshire Local Plan.</p> <p>I have been advised that Bleu Raye Farm has been illegally occupied since 2010; recent planning applications for change of use of a stable to a dwelling have been refused, because the proposed development was considered inherently unsustainable given its rural location. I am, therefore, surprised that the site would now be considered acceptable to accommodate an additional four households. I would argue that the site remains unsustainable.</p> <p>Especially as the local primary schools in Whaplode and Moulton are already fully subscribed, and demand for GPs in Moulton is high.</p> <p>Local residents have told me that they foresee difficulties with connection to services, such as water and electricity.</p> <p>They are further concerned about the access to the site, with a restricted view and the potential increase in vehicle movements.</p> <p>The site clearly has at least two immediate neighbours namely Home Farm and Longacres, neither of whom own the site. A traveller site would have a significant impact on their outlook and amenity, along with a reduction in property value.</p> <p>Screening of the site by trees and hedging is mentioned but understand the trees and hedging on the north and east sides belong to Home Farm. From the information provided, I do not consider this site suitable as a proposed gypsy/traveller site in the South East Lincolnshire Local Plan.</p>	<p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>It is expected that waste water will be dealt with by septic tanks. There is currently a three-phase electrical supply to the site, which will be capable of serving four households. Anglian Water Services Ltd. comments that four domestic connections to the potable water supply network can be supplied at this location without the need for reinforcements to be made to the existing network.</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this</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 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts.

At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

Potential loss of property value is not a material planning consideration.

The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape. The ownership of the trees or hedges which currently screen the site is not considered to be material.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	244	Respondent Number:	2779	Comment Author:	Mr P and Ms A Limming	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:				
Site Allocation Number:						

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

Legally Compliant

Sound

Prepared in accordance with Duty to Cooperate

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

Positively Prepared

Justified

Effective

Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate:

Although we reside in Snaffers Lane, which is off Millgate and as such would not be directly affected by the proposed development, I wish to make the following observations with regard to the proposal document I have had sight of.

Under Suitability item v. it is stated that the proposed development would only affect one dwelling, but it would appear that it would in fact be in close proximity to two existing dwellings.

It has been shown in the past that a development such as this has a hugely detrimental effect on the value of any property in close proximity and at worst renders them un-saleable as evidenced by the unauthorised site in Cranmore Lane, Holbeach before it was removed. It seems grossly unfair that such a burden should be put on the existing inhabitants.

Regarding Suitability item ix. The Highways Authority has obviously not lived near and regularly used Millgate as I and my wife have for the last 33 years! I can assure you that the advent of satnav has lead to this becoming a very busy and hazardous stretch of road, with many HGV's now using it as a short cut. If whoever made the judgement on behalf of the Highways Authority had been nearly been forced down the dyke by an HGV, needing two thirds of the road width, as often as my wife and I have then I think they may have reached a more reasoned conclusion! I would suggest that Millgate is not suitable for any form of development that would increase the traffic volume.

Under Suitability item xi. I note the site is considered potentially suitable for mixed residential and business use. Has it not been noticed that this is a greenfield site, in the heart of the countryside?

Although the above are reasons enough to render this is a wholly unsuitable location for such a development there are other issues to ponder: is there actually a proven need for this site?

Why is a greenfield site even being considered when there are other far less precious parcels of land that could be used?

Why is this proposal being considered when other

It is accepted that the Topic Paper – Provisions for gypsies, travellers and travelling showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". The dwelling located to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site and, whilst the dwelling's occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm, although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. Whilst the occupants of Home Farm would no doubt be aware that the use of nearby land had changed, this would not amount to significant adverse effects.

Potential loss of property value is not a material planning consideration.

The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.

The site is intended to be developed primarily for residential use. Any business use would be ancillary

No change to the Local Plan is required.

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

planning applications along Millgate have been refused? I believe the very location in question has had planning permission refused on more than one occasion, all be it that the illegal occupant still resides there! One can only hope that the powers that be will reconsider this poorly thought out and damaging proposal.

only.

The Boston and South Holland Gypsy and Traveller Accommodation Assessment (November 2016) identifies a need for at least 4 residential pitches in South Holland.

It is agreed that the allocation of a previously-developed site would be preferable. However, no previously-developed sites were put forward as potential sites for consideration.

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	246	Respondent Number:	2782	Comment Author:	Mrs A Rummery	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	
Site Allocation Number:			

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

Legally Compliant

Sound

Prepared in accordance with Duty to Cooperate

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

Positively Prepared

Justified

Effective

Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

I feel I must write to protest about the proposed traveller site at Bleu Raye Farm, Whaplode Fen. In the proposal it mentions that the only existing dwelling that directly adjoins the site is the home of the site owner. This is literally not true. First and foremost the site does adjoin our property! What might look like farmland/grassland on an old map is in fact our carefully tended/managed wildlife garden for which we have invested a lot of time, energy and money over the past 40 years. We have worked locally, brought up a family, put up with the disadvantages of living in the countryside (no bus route, no immediate amenities, limited services etc.) to make a home where we can enjoy the peace and tranquillity. We have created a sanctuary for wildlife and have recorded over 100 species of birds alone including nesting tawny and barn owls. Disturbance from a busy site (it mentions business use) will deter these and other nesting birds. The screening mentioned will not screen noise and light pollution. The distant views from the north are not very distant from our property.

The site only has planning permission for a stable block and is not a legal dwelling. I understand the owner is in breach of planning permissions and has been served an enforcement notice. How can the owner of the stables have had planning permission refused for a domestic dwelling as it would contravene the preservation of the character of the countryside yet a proposal for up to 8 caravans be ok?

On another point the road up to Whaplode (Millgate) is not suitable for extra traffic. I am regularly forced off the road by vehicles not slowing down and in one instance suffered a puncture and damaged wheel because of having to go on the verge.

AND WHY WERE WE NOT CONSULTED being immediate neighbours to the site?

It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". The objector's dwelling (assumed to be that located to the south-west of the allocated site) has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. At the time of a planning application, the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts. Thus, whilst the dwelling's occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

It is considered unlikely that residential development for 4 households (with possible ancillary business use) would have the detrimental impacts upon local birdlife envisaged by the objector. In any event, neither the objector's garden nor any other nearby areas of land are identified as being of importance to nature conservation.

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.

No change to the Local Plan is required.



Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).

Response Number	250	Respondent Number:	2783	Comment Author:	Mrs J Brakespear	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content		Officer Comment:		Officer Recommendation:	
Policy Number:	17	Map Number:	72						
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>		<p>1. There has been a refusal of planning permission on this site already for 1 dwelling. This was refused due to lack of amenities, no public transport, no facilities within walking distance. In fact no paths to walk safely at all or lighting. 2. If this is the case for the refusal, then how can you justify 4 plots for Travelling families? They will require more amenities and there is no local shop within walking distance, the school is already full and the doctors are overloaded already.</p> <p>3 There is no mains drainage in the area so what extra facilities would need to be provided to cope with 4 families?</p> <p>4 The area is not able to sustain further development and you have already refused other single dwellings in the area for the same reasons.</p> <p>There are I understand other proposed sites including the site Drain Bank North where there is already an adjoining traveller site which has already proved suitable to their needs. Therefore I feel I must object to the proposed Blue Raye Farm.</p>		<p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is expected that the site will be served by septic tanks.</p> <p>Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>		<p>No change to the Local Plan is required.</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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	251	Respondent Number:	2784	Comment Author:	Anne Austin	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		<p>I recently attended the Parish Council Meeting at Whaplode St Catherine Village Hall regards the proposed traveller site at Whaplode Fen. My main thoughts on the matter are: As I understand it planning permission was not granted for standard housing on the site, whether it be a single house or small number of houses. The reasons for this were presumably location based, not near shops, schools and public transport, access and utilities. Therefore I assume the same principles should be used to assess the site for static caravans.</p> <p>I also note it said the site only adjoined the land of the seller, but I believe it joins a property on the west end of the site. I assume this should have some bearing on the matter.</p>	<p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is accepted that the Topic Paper – Provisions for gypsies, travellers and travelling showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". The dwelling located to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site and, whilst the dwelling's occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	255	Respondent Number:	2785	Comment Author:	Eric Austin	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	72	I believe this part of the Local Plan to be neither legally compliant nor sound as:- a. the site is not safe as the vehicular access on such a narrow road leading to the site is dangerous and currently there are no pavements for pedestrians. In the past planning permission proposals have been turned down on Millgate due to reasons of volume of traffic and narrowness of the road.	The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.	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

b. the site cannot provide occupants with an acceptable quality of life as there is no mains drainage, no shops or schools in walking distance.

C. The site will have a detrimental affect on nearby properties. One adjoining property has an established and much needed wildlife area on their land which would be seriously affected by such a proposal.

It is expected that the site will be served by septic tanks.

Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

The dwelling located to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. It is not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site and, whilst the dwelling's occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects. It is considered unlikely that residential development for 4 households (with possible ancillary business use) would have significant detrimental impacts upon the 'wildlife area' which forms part of the curtilage. In any event, neither the 'wildlife area' nor any other nearby areas of land are identified as being of importance to nature conservation.

The allocated site does not adjoin the curtilage to the

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

dwelling known as Home Farm, although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. Whilst the occupants of Home Farm would no doubt be aware that the use of nearby land had changed, this would not amount to significant adverse effects.

<b>Response Number</b>	256	<b>Respondent Number:</b>	2786	<b>Comment Author:</b>	Mrs M Rose	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	17	<b>Map Number:</b>		<p>Re: Bleu Raye Farm I would like to register a comment to this proposal for the following reasons: There has been a refusal of planning on this site already for 1 dwelling. This was refused due to lack of amenities, no public transport, no facilities within walking distance. In fact no paths to walk safely at all or lighting. If this is the case for the refusal, then how can you justify 4 plots for travelling families? The area is not able to sustain further development and you have already refused other single dwellings in the area for the same reasons.</p> <p>They will require more amenities and there is no local shop within walking distance, the school is already full and the doctors are overloaded already.</p> <p>There is no mains drainage in the area. So what extra facilities would need to be provided to cope with 4 families.</p> <p>There are, I understand, other proposed sites including the site at Drain Bank North where there is already an adjoining traveller site which has already proved suitable to their needs. Therefore I feel I must object to the proposal at Bleu Raye Farm.</p>	<p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is expected that the site will be served by septic tanks.</p> <p>It is assumed that the other sites referred to by the objector are Rose View Drive, Holbeach and Drain Bank North, Spalding. It is not accepted that these sites are more suitable than the allocated site, because:</p> <ul style="list-style-type: none"> <li>- there is no evidence that landowners would make land available for such development;</li> <li>- these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and</li> <li>- it is not agreed that these sites would offer materially superior access to facilities.</li> </ul>		<p>No change to the Local Plan is required.</p>		
<b>Site Allocation Number:</b>		<p><i>Do you consider that this part of the Local Plan is</i></p> <p><b>Legally Compliant</b> <input type="checkbox"/></p> <p><b>Sound</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>							
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									

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Response Number	258	Respondent Number:	2778	Comment Author:	Anne-Marie Laming	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:	
Policy Number:	17	Map Number:		<p>I write to protest in the most forceful terms against the proposed adoption within the local plan of a plot of land at Whaplode Fen, (see map 72 of your local plan) with the aim of gaining planning permission there for a Gypsy/Traveller site. My husband owns and farms the land both North and South of the field in question. I know that residential planning permission has been refused on many occasions on it, and understand that any Traveller/Gypsy site is subject to the same general planning rules and tests as residential sites.</p> <p>Unless those rules have changed or you are at liberty to ignore them, I therefore remind you that it remains the case that this acreage lacks the required access to educational, health, transport and recreational facilities that would be a pre-requisite to planning consent being granted. The site is in open country, (what you refer to as a greenfield site), is isolated, not within walking distance to shops or ANY amenities. There is NO public transport. There is no settlement nearby, nor any essential services.</p> <p>The presence of Travellers would have an adverse effect on the only existing amenity there, namely farmland.</p> <p>It is right next to [name deleted for reasons of confidentiality] Home Farm, and [names also deleted] home, and would affect their use of their dwellings.</p> <p>The Millgate Road to which the plot connects is narrow, and vehicles (inevitably large and long!) into and out of it would constitute a serious traffic danger to what is already a busy lane.</p> <p>Additionally, there are scarce local policing resources to provide the checks and balances necessary on the actual use of this plot, as has already been demonstrated by past performance of other local gypsy and traveller sites.</p> <p>Finally, there exist already 2 approved settlements in the area, (cf Drainbank North in Spalding) so why not extend them to both ease the requirement for policing and comply with government guidelines? In the belief that consistency, reason and fairness to all residential people in the area will prevail, I look forward to this proposal being denied, on the grounds that it is totally inappropriate.</p>	<p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>There is no evidence to suggest that the development of the site as a residential Gypsy/Traveller site for 4 households would have harmful impacts on nearby farmland.</p> <p>It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate</p>				<p>No change to the Local Plan is required.</p>	
Site Allocation Number:										
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:										
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.

There is no evidence to suggest that the development of the site as a residential Gypsy/Traveller site for 4 households would place undue additional demands upon police services.

It is not agreed that extensions to Rose View Drive, Holbeach and Drain Bank North, Spalding would be more suitable than the allocated site, because:

- there is no evidence that landowners would make land available for such development;
- these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and
- it is not agreed that these sites would offer materially superior access to facilities.

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Response Number	259	Respondent Number:	2788	Comment Author:	Mr S Mayne	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:		Re: Bleu Raye Farm We refer to the Councils proposals to partially develop this grassland into temporary and/or permanent residential accommodation, with business use. We had 2 dilapidated barns on our land in Millgate in 2007 and spoke to the council about planning permission for a property to be built for our elderly parents (now both in their mid-80's and needing regular visits / attention) to live close by. We were told that no permission would ever be granted outside the boundary of Whaplode village and certainly not on ground in an agricultural area. The existing owner of the land has sought permission over many years to be allowed to live on it. Each application has been rejected on the basis of it not being suitable, eventually, I understand leading to her eviction. If the land was not suitable for one person to live there, how can it be suitable for the latest proposal I refer to the Appeal Decision made on the 21st February 2017, and the rationale within.  On hearing that the proposal is not just for accommodation but business use is astounding, given nature of the area.  There is no street lighting, no public transport service, no access to local facilities (the nearest shops, schools and bus routes are around 3.5 miles away Doctors and dentists are even further.)  During the winter, the road is not gritted or cleared in the event of ice or snow. A few years ago a vehicle crashed into our hedge, having hit ice fortunately for them the car came towards our garden and not the deep drain on the other side. The road itself is not wide enough for two lanes of traffic. In January this year I was involved in an accident near Eagle House Millgate, when an oncoming vehicle's wing mirror hit mine. We were both driving small family hatch back's (Vauxhall Astra's), nothing like the size of vehicle used to tow a caravan, or 4x4 or van/lorry/truck, needed to run a business. Several years ago outside our property the road had to be reinforced as part of it was subsiding. There is evidence that this subsiding again, with the surface uneven again with increased numbers of vehicles and their potential weight (for towing caravans and business use) I can envisage further road repairs being necessary. In respect of the use of the land, as well as changing use from agricultural to residential, the	It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.  The site is intended to be developed primarily for residential use. Any business use would be ancillary only.  Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.  The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.  It is assumed that the other sites referred to by the objector are Rose View Drive, Holbeach and Drain Bank North, Spalding. It is not accepted that these sites are more suitable than the allocated site, because: - there is no evidence that landowners would make land available for such development; - these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and - it is not agreed that these sites would offer materially superior access to facilities.  The Environment Agency Flood Map shows the site as partly within Flood Zone 1 and partly within Flood Zone 2, where permanent residential caravans will be appropriate provided the Sequential and Exception Tests have been passed. Under the 'Sequential Test' the site should not be allocated if there are reasonably available sites appropriate for the use in areas with lower probability of flooding. The Topic Paper -	No change to the Local Plan is required.
Site Allocation Number:						

<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>	
Legally Compliant	<input 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 checked="" type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate:

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

proposal also mentions business which one might assume vans or lorries. Our driveway and house frontage is regularly used as a passing place for vehicles, with the verge constantly being churned up by tyres.

Having investigated existing traveller's sites in the area, I believe there are other sites either not being used to their capacity or with space to expand. Why therefore is this unsuitable site being proposed?

In respect of the land itself, it is deemed to be within an area at risk of flood. Furthermore, part of the land near the drain/dyke is thought to be in a high risk area allowing accommodation for single storey occupancy cannot be appropriate.

In respect of the local schools, the nearest being over 3.5 miles away, it is already close to or at capacity for pupils especially given the recent new building development within Whaplode itself.

Turning to the actual proposal itself, there are several factual inaccuracies. It says that the site owner is the only adjacent property - This is incorrect.

Furthermore, it says the site is screened. Again this is incorrect being clearly visible from our property.

It also acknowledges this would be a green-field development, which goes against what we and others have been told in the past, would be allowable.

Provision for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) identifies that there are no alternative sites which are at lower probability of flooding, and which are available and suitable. Thus, the Sequential Test is passed. The 'Exception Test' is passed if the development provides wider sustainability benefits to the community that outweigh flood risk, and a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime. It is considered that the benefits that accrue from meeting objectively assessed needs for accommodation for Gypsies and Travellers outweighs flood risks. A site-specific flood risk assessment would be required at the time of a planning application.

The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).

It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within



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the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

The objector's dwelling is located more than 450m to the north of the allocated site. The Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) acknowledges that "from the north, only partial and distant views are available". It is not therefore accepted that the Topic Paper is incorrect, and it is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.

The objector is correct that the allocated site is 'greenfield' (i.e. it is not previously developed land). However, whilst the use of previously developed land is preferable, the fact that the site is greenfield does not make it unsuitable for development.

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Response Number	260	Respondent Number:	2787	Comment Author:	Avril Mayne	Client		Web Link					
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:				
Policy Number:	17	Map Number:		Re: Bleu Raye Farm I refer to the Councils proposals to partially develop this grassland from a small holding into temporary and/or permanent residential accommodation.  Our initial and formal notification of these plans was 11 April 2017 at approximately 10pm when a kindly neighbour informed us by a leaflet through the door of a meeting due to be held at the Whaplode St Catherine Village Hall the following evening. To say I was astounded was an understatement, and would ask for your assistance, support and commitment to oppose this project which will cause severe disruption to the existing community.  By implication and tailor made comments to suit the Councils criteria, the land fulfils their requirements, which I believe to be in direct contravention of their current planning policies. The current owner has attempted over for the past 7 years to occupy the land in a residential status capacity, but continually rejected by the Council accumulating to their successful eviction in March 2017. Furthermore at the meeting, I learnt of a number of residents applying to the Council planning department, one to extend an established commercial site to diversify on a similar basis to these current proposals and another to operate a very low key business from. I understand planning permission has been rejected on one with an appeal pending and the other is progressing with some difficulty.  How is the Council now able to justify their scheme for the erection of residential premises and facilitate these properties with the various services required to make habitable. There is also the additional costings to be incurred which must have some bearing on the present set budgets. Perhaps you would be able to explain the logic as I fail to understand or see it.  The documentation provided by the website, shows mixed residential and business use, this area and that surrounding it, is steeped in tradition of a rural, agricultural community. It is extremely unlikely the potential occupants would operate similar businesses, and therefore be in complete contrast with the local landscape. An unnatural usage of the land currently held in a small holding capacity.				The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).  It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.  It is acknowledged that the site is greenfield and that there will therefore be costs to bring it into use (e.g. creation of a new vehicular access and hardstandings, installation of septic tanks, etc.). However, it is not expected that opening up and infrastructure costs would threaten the financial viability of the site's development.  The site is intended to be developed primarily for residential use. Any business use would be ancillary only.  The site could be occupied only by Gypsy or Traveller households, i.e. those which meet the definition set out in Annex 1 of Planning Policy for Traveller Sites (August 2015).  The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.  The Environment Agency Flood Map shows the site as partly within Flood Zone 1 and partly within Flood Zone 2, where permanent residential caravans will be appropriate provided the Sequential and Exception Tests have been passed. Under the 'Sequential Test' the site should not be allocated if there are reasonably available sites appropriate for the use in areas with lower probability of flooding. The Topic Paper - Provision for Gypsies, Travellers and Travelling				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 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 checked="" 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													

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There are a number of properties in the vicinity with an agricultural clause attaching to them. I have been made aware of the difficulties encountered for these to be removed should the owner of the property wish to diversify their business interests or sell the property. I would assume such clauses would not be applicable to this particular proposal.

As a direct consequence of these proposals, the lane would be subject to increased heavy traffic during the course of modernisation. It is extremely unlikely the road could withstand this, not only in durability but also the width. Vehicles, tractors, lorries and the like generally use our yard entrance to pull over on, or the verge which is churned up on a regular basis, allowing traffic travelling in the opposite direction to pass safely. My husband has first-hand experience of the lane not being wide enough to accommodate two passing vehicles resulting in clipped wing mirrors each needing replacement. Speed was not an issue as one had pulled out from our yard and both were keeping to their side of the roadway. Consideration must also be taken into account of the nature of the vehicles likely to be used by the proposed occupants, their associated businesses and also use of temporary trailers.

For insurance purposes the environmental survey maps used by these specialists dictate the land lies within a flood risk area, meaning special terms would be applicable or cover for the peril to be excluded. Single storey properties would be unsuitable surely, for an area with this type of risk attaching to it.

The proposals suggest the proposed site is screened from view and there are no neighbouring properties. To the best of my knowledge there are at least two which abut the site and it will be clearly visible from our property and also that of our neighbour.

Local amenities, such as a local shop, school are at least 3 miles away, located in the hub of the village, there is no accessible public transport, which I thought were essential, core elements for a proposed development.

With the current properties being built in the village likely to appeal to young families, the school may be reaching, if not already its full capacity for pupils. The nearest doctors or dentist can be found in the next larger village, again the assumption is being made they would be able to facilitate the occupants of the proposed site, or alternatively they would need to travel

Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) identifies that there are no alternative sites which are at lower probability of flooding, and which are available and suitable. Thus, the Sequential Test is passed. The 'Exception Test' is passed if the development provides wider sustainability benefits to the community that outweigh flood risk, and a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime. It is considered that the benefits that accrue from meeting objectively assessed needs for accommodation for Gypsies and Travellers outweighs flood risks. A site-specific flood risk assessment would be required at the time of a planning application.

It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no

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to Spalding. Hardly a practical arrangement.

doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

The objector's dwelling is located more than 450m to the north of the allocated site. The Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) acknowledges that "from the north, only partial and distant views are available". It is not therefore accepted that the Topic Paper is incorrect, and it is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.

Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).

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Response Number	265	Respondent Number:	2789	Comment Author:	Susanne Joyce	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		Re: Bleu Raye Farm There are several things I think should be taken into account before planning is granted. The access required for emergency vehicles. A fire engine would have great difficulty turning into the gateway from the country lane leading to the property.  There would also be extra pressure on the ambulance and police services.  The local doctors and schools are also stretched to capacity. These are just a few of the reasons I feel this site would not be appropriate for the site.	The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety. Lincolnshire Fire and Rescue – Fire Protection Department indicates that it has no issues with the site allocation.  There is no evidence to suggest that the development of the site as a residential Gypsy/Traveller site for 4 households would place undue additional demands upon ambulance or police services.  The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).		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 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:		Positively Prepared <input type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	266	Respondent Number:	2790	Comment Author:	Mrs J Singh	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				
Policy Number:	17	Map Number:		Re: Bleu Raye Farm We are writing to you to give our objection to the SELLP for the above site. The area is not suitable for this kind of development, due to several reasons; The access road is not wide enough to accommodate increased traffic. It is a single track road with not many passing places available.  The area being in an isolated rural position, with no public transport, means it is not convenient to walk to any facilities. That means any persons located at the site would rely heavily on the use of a car, which contravenes the aims of NPPF section 17. The area does not have sufficient shopping facilities within easy reach of the site. The nearest school facility is not within walking distance, there is no public transport that could allow children to safely get to school.  The area does not have a school available to accommodate any children that may be housed on the site.  There is currently no lighting, drainage or utilities available for the site.  The land is in a flood risk area, which is not suitable for caravans/mobile homes.  The land has been illegally occupied since 2010. Planning permission was not granted for one dwelling on this land, so to now expect planning for 4 households/8 caravans to be granted, would put immense strain on the infrastructure of our local area.  There is a purpose built travellers site in our area, located at North Bank in Spalding which has vacancies. This existing site would be more beneficial for occupants to use.				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 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: Positively Prepared <input checked="" type="checkbox"/> Justified <input checked="" type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" type="checkbox"/>	
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	There is a purpose built travellers site in our area, located at North Bank in Spalding which has vacancies.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

site should not be allocated if there are reasonably available sites appropriate for the use in areas with lower probability of flooding. The Topic Paper - Provision for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) identifies that there are no alternative sites which are at lower probability of flooding, and which are available and suitable. Thus, the Sequential Test is passed. The 'Exception Test' is passed if the development provides wider sustainability benefits to the community that outweigh flood risk, and a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime. It is considered that the benefits that accrue from meeting objectively assessed needs for accommodation for Gypsies and Travellers outweighs flood risks. A site-specific flood risk assessment would be required at the time of a planning application.

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	267	Respondent Number:	2790	Comment Author:	Mr N Singh	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>Re: Bleu Raye Farm We are writing to you to give our objection to the SELLP for the above site. The area is not suitable for this kind of development, due to several reasons; The access road is not wide enough to accommodate increased traffic. It is a single track road with not many passing places available.</p> <p>The area being in an isolated rural position, with no public transport, means it is not convenient to walk to any facilities. That means any persons located at the site would rely heavily on the use of a car, which contravenes the aims of NPPF section 17. The nearest school facility is not within walking distance, there is no public transport that could allow children to safely get to school. The area does not have sufficient shopping facilities within easy reach of the site.</p> <p>The area does not have a school available to accommodate any children that may be housed on the site.</p> <p>There is currently no lighting, drainage or utilities available for the site.</p> <p>The land is in a flood risk area, which is not suitable for caravans/mobile homes.</p> <p>The land has been illegally occupied since 2010. Planning permission was not granted for one dwelling on this land, so to now expect planning for 4 households/8 caravans to be granted, would put immense strain on the infrastructure of our local area.</p> <p>There is a purpose built travellers site in our area, located at North Bank in Spalding which has vacancies. This existing site would be more beneficial for occupants to use.</p>			Officer Comment:	Officer Recommendation:
Policy Number:	17	Map Number:			<p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>It is expected that waste water will be dealt with by septic tanks. There is currently a three-phase electrical supply to the site, which will be capable of serving four households. Anglian Water Services Ltd. comments that four domestic connections to the potable water supply network can be supplied at this location without the need for reinforcements to be made to the existing network.</p> <p>The Environment Agency Flood Map shows the site as partly within Flood Zone 1 and partly within Flood Zone 2, where permanent residential caravans will be appropriate provided the Sequential and Exception Tests have been passed. Under the 'Sequential Test' the</p>			No change to the Local Plan is required.	
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	There is a purpose built travellers site in our area, located at North Bank in Spalding which has vacancies.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									



**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

site should not be allocated if there are reasonably available sites appropriate for the use in areas with lower probability of flooding. The Topic Paper - Provision for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) identifies that there are no alternative sites which are at lower probability of flooding, and which are available and suitable. Thus, the Sequential Test is passed. The 'Exception Test' is passed if the development provides wider sustainability benefits to the community that outweigh flood risk, and a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime. It is considered that the benefits that accrue from meeting objectively assessed needs for accommodation for Gypsies and Travellers outweighs flood risks. A site-specific flood risk assessment would be required at the time of a planning application.

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

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Response Number	268	Respondent Number:	2794	Comment Author:	3D Planning Ltd	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>In summary It is considered that the proposed allocation does not represent sustainable development as require by the NPPF or the overriding district wide policies in the current or emerging local plan. The site is located in an isolated rural location distant from local services and facilities, and in a position where daily convenience trips would be highly reliant on the private car contrary to the overriding aims of the NPPF and local plan which seek to restrict reliance on the private car and locate new development in accessible and sustainable locations (as defined in the settlement hierarchy.)</p> <p>The site is allocation is not consistent with the statement at 5.8.1. In Planning policy for traveller sites, 2015, the Government identifies that its overarching aim is to ensure fair and equal treatment for travellers. It is consider that as this is clearly not a location that would be considered sustainable or accessible for a development of permanent houses due to its location and isolation and as such is not appropriate for other forms of residential allocation such as a traveller site. Whist weight can be applied to the special needs of gypsies and travellers it is not sufficient to outweigh all other sustainability considerations.</p> <p>The site lies in an area at risk from flooding and national policy guidance is clear that vulnerable uses such as mobile home and caravans should not be allowed in areas at high risk from flooding. It is clear that sequentially there are other sites that could and should be considered. Below key issues are addressed.</p> <p>Sustainability; NPPF (the Framework) identifies sustainability at the heart of the planning process and at Para 7 the 3 strands of sustainability are identified; it is considered that the allocation of the above site is not compatible with any of the 3 strands or their substantive aims. Beyond Para 7 the Framework goes onto consider how sustainable development can be delivered through development planning and planning application decisions. Par 17 sets out 12 principles of sustainable development which in effect act as tests against which plans, proposals or applications must be judged. Interlalia Point 4 seeks high quality design. Point 5 requires consideration of the character of the countryside recognizing the intrinsic character and beauty of the countryside. Point 6; sets out a wider</p>	<p>It is not agreed that the site conflicts with the requirements of Planning Policy for Traveller Sites set out in paragraph 5.8.1 of the Local Plan.</p> <p>The Environment Agency Flood Map shows the site as partly within Flood Zone 1 and partly within Flood Zone 2, where permanent residential caravans will be appropriate provided the Sequential and Exception Tests have been passed. Under the 'Sequential Test' the site should not be allocated if there are reasonably available sites appropriate for the use in areas with lower probability of flooding. The Topic Paper - Provision for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) identifies that there are no alternative sites which are at lower probability of flooding, and which are available and suitable. Thus, the Sequential Test is passed. The 'Exception Test' is passed if the development provides wider sustainability benefits to the community that outweigh flood risk, and a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime. It is considered that the benefits that accrue from meeting objectively assessed needs for accommodation for Gypsies and Travellers outweighs flood risks. A site-specific flood risk assessment would be required at the time of a planning application.</p> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul>	No change to the Local Plan is required.			
Site Allocation Number:	5.8.4								
<p><b>Do you consider that this part of the Local Plan is</b></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Soun <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policv <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:		<p>It is considered that the LPA should seek to undertake a strategic site selection process to identify alternative sites in a more sustainable and accessible location in accordance with planning policy. It has been suggested that Drain Bank North near Spalding may be appropriate, however a policy and constraint led search should identify the most sustainable, accessible and appropriate location for a new traveller site.</p>							
Participate in Examination:		<input checked="" type="checkbox"/>							
Why wish to participate		3D Planning has been retained by a consortium of local residents who wish to have their point of view aired at the EIP.							

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strategy to reduce reliance on carbon based fuels, for heating and transportation with a requirement to support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change Point 11 seeks to secure sustainable and accessible development not reliant on the private car; it is wholly appropriate at the development plan stage to seek to make policies and shape development patens that are the most accessible achievable and this is particularly important in rural and inaccessible areas where there are no realistic options to the private car. It goes on to require that local plans; actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling. It is considered that the site is manifestly unsuitable for residential development due to its isolated location in open countryside away from local services and facilities and as such cannot reasonably be regarded as being sustainable development. The draft local plan is predicated on achieving sustainable development and the general structure of the draft plan seeks to achieve this by identifying those areas best capable of accommodating sustainable growth. The purpose of the settlement hierarchy within the local plan and emerging local plan is to identify those settlements and areas which are consider to be most sustainable and accessible. The criteria for judging this is set out in the background papers which inform the plan. Clearly the site is not in or adjacent to any settlement which is deemed as appropriate location for new development within the plan. Whilst weight must be given to the special needs of travellers and gypsies the national guidance requires accessibility and integration to be considerations rather than rural isolation. It is not considered that the site is socially, economically or environmentally sustainable.

Flood risk Reference is made to Framework para 100 sets out the government's policy in terms of managing flood risk and climate change. Whilst it is acknowledged that a significant portion of South Holland is within a flood zone it is clear from the EA maps that there are alternative sites in more sustainable and accessible locations that are in zone 1 and as such are sequentially preferable in terms of general sustainability as well as flood risk. It is reiterated that the NPPF at para 100 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. It is considered that the proposal is

The site selection process examined only areas of land that had been specifically promoted for development as Gypsy/Traveller or Travelling Showpersons' sites. The assessment of sites that has been promoted for 'bricks and mortar' housing through the SHLAA was considered to be inappropriate as their availability for development for a different use could not be relied upon.

It is not accepted that the requirement on the land owner to pay part of the uplift in value to the site's previous owner will impact upon deliverability. The site owner is aware of the requirement and has chosen to promote the site for development.

It is expected that waste water will be dealt with by septic tanks. There is currently a three-phase electrical supply to the site, which will be capable of serving four households. Anglian Water Services Ltd. comments that four domestic connections to the potable water supply network can be supplied at this location without the need for reinforcements to be made to the existing network.

It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m

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inappropriate development due to being spatially unsustainable and as such the provision of para 100 should prevail. This approach is reiterated in The Practice Guidance Planning and Flood Risk 2014 in relation to applying the sequential test to local plan making; 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 This is explained at table 2 below which identifies residential caravans and mobile homes within the highly vulnerable category in terms of FRA. Table 2: Flood risk vulnerability classification places caravans within the highly vulnerable category and as a consequence this is a use to which special circumstances would be necessary to override the demonstrable vulnerability of the caravans and mobile homes to flooding. Caravans and mobile are units of accommodation that not only are prone to floating and being disrupted by flood water, but are also lacking a first floor retreat if flood waters rise.

Process of site selection The assessment of options within the Topic Paper Provisions for gypsies, travellers and travelling showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) seems to have focused solely on sites promoted by landowners within the preceding sections. It is considered that this approach improperly restricts options considered and in the first instance the LPA should have carried out a spatial assessment of those areas / sites that might be suitable having regard to the strategic locational criteria in the national policy. It is clear that no one who has aspirations of promoting a site for a housing allocation would promote a site of a gypsy and traveller allocation due to the significant difference in values, however if they are not successful as a housing allocation they may consider a gypsy and traveller allocation with encouragement from the LPA. It is clear that in policy terms the locational criteria are similar to those of the consideration of housing allocations and as such it should be incumbent on the LPA to identify the best and most sustainable sites for the gypsy and traveller allocations. By only considering sites that were promoted for a gypsy and traveller allocation only a very small number of sites have been assessed and the LPA has had to pick from a limited and inappropriate selection. To this extent the process of site selection is considered to be unsound.

and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

The site is intended to be developed primarily for residential use. Any business use would be ancillary only.

Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation (SSSI, Local Wildlife Site, etc.).

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

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In respect to Bleu Raye Farm assessment it is considered that the justification within The assessment of options within the Topic Paper Provisions for gypsies, travellers and travelling showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is somewhat cursory and has not investigated the criterion in detail before coming to conclusions. Below is a critique of the selection criterion used in the above for site selection by the LPA with the LPA text in *Italic* and our response/ comment in **bold**.

**AVAILABILITY** The site is available now. The site's owner indicates that they will offer the land for sale with immediate effect if it is allocated. There are no known legal or ownership problems. It is understood from reading Title LL243794 which is the HM Land registry title of the proposed allocation, dated 13-7-2004 (copy at appendix) provides for a payment of 50% of the uplift value between the current use value and that with planning permission 12.2.1 ; clearly this may well be material to an assessment of viability and deliverability of the scheme.

**ACHIEVABILITY** The site is achievable there is a reasonable prospect that development would be delivered on the site within five years. The site is greenfield, so there will be costs to bring it into use (e.g. Creation of a new vehicular access and hard standings, installation of septic tanks, etc.). However, it is understood that water and electricity supplies are adequate to accommodate four households, and opening up and infrastructure costs are not expected to threaten viability. See above in relation to viability; it is expected that any assessment of infrastructure availability would have gone beyond it is understood that that supplies are available and adequate, this should be established before a proposed allocation is made.

**SUITABILITY**

- i. It is considered that the site would provide occupants with an acceptable standard of amenity it is not close to any potential bad neighbour uses;
- ii. The site is not located adjacent to any uses likely to endanger the health of occupants;
- iii. It is understood that all necessary on-site infrastructure is available and capable of accommodating four households; None of the suitability criterion above relate to the spatial location and accessibility / sustainability of the site itself , and whilst these are important considerations they should be applied to sites that are spatially in the right places in respect to settlements and transportation. To apply

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them to an isolated location in open countryside and therefore a fundamentally inappropriate location is misguided.

Iv. The scale of the resulting site would not conflict with that of the nearest settled community (Whaplode St Catherines); The nearest community is in fact the grouping of homes immediately around the site along Millgate and Hurdletree Bank and there are 6 settled households within 250m of the proposed site. For the assessment to concentrate on Waplode St Catherines whilst not mentioning the impact on immediately adjacent properties is considered a misdirection and inappropriate

v. The site is predominantly surrounded by farmland/grassland and, although there are nearby dwellings, the only existing dwelling that directly adjoins the site is the home of the site owner. It is considered that the site could be developed as a gypsy/traveller site for four households without it having a significant adverse effect on the amenities of existing local residents or adjoining land users; There are 2 dwellings owned by third parties within 50 m of the site and it is surprising that these are not considered within the above assessment; whilst they are not adjacent to the site they will clearly be impacted by the proposal in terms of residential amenity and visual amenity. Clearly given the open character of the site and the very low ambient noise levels these impacts will be material. Again this is considered to be an example of a cursory assessment that has not considered the relationship of the site to its surroundings.

Vi. It is not considered that the development of a site for four households would place undue pressure on local infrastructure; This appears to be counter to general assessment of sustainable development in as much as recent application for new housing along Millgate have been refused permission as that are not deemed to be sustainable and that a dispersed pattern of new development runs counter to the overriding theme of the plan which is one of concentrated development.

Vii. The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape; It is noted that an appeal on the site for a single stable block was refused explicitly on unacceptable impact on the countryside and landscape character. This character has not materially changed in the interim and it is clear that the proposal would cause significantly more harm to the local amenity than a single stable block. In this

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respect it appears that the LPA assessment of the site is somewhat cursory. Reference is made to APP A2525/A/10/2142896 para 4 which concluded that a single stable block would be unacceptable due to visual impact.

Viii. The development of the site would not affect areas of importance to nature conservation. The site is located just over 1 kilometre from a Scheduled Ancient Monument, but it is not considered that its development would adversely affect this heritage asset;

ix. The Highway Authority indicates that the development of the site to accommodate four gypsy/traveller households should be possible without creating any materially harmful impact upon the local highway network;

x. Many facilities are available in Whaplode, just over 3 kilometres from the site. A fuller range of facilities are available in Holbeach, approximately 5 kilometres from the site; It is noted that the distances quoted are straight line distances rather than road distances. In relation to Waplode this does not make a material difference as the road is relatively straight, however the travel distance to Holbeach centre is at least 4.2 miles which is a significant distance when considering sustainable development and a sequential approach to land allocation. It is noted that there is no public transport past the site and as such residents would be reliant on the private car for the majority of trips. This was addressed in an appeal decision relation to a nearby site in Millgate, App ref APP/A2525/A/10 2142847.

xi. It is considered that the site is potentially suitable for mixed residential and business use; and There is nothing in the preceding assessment or policy appraisal to suggest or justify any mixed use or commercial use on the potential allocation site. To accept or promote this site for commercial use would lead to increased traffic movements, increased impact on ecology, residential amenity and wider character of the countryside and any increase in activity will be clearly visible in the landscape. In order to justify the above in a flat open fen landscape it is considered that a formal LVIA or transportation assessment would be necessary as open views will be available from the south north and east of the site. It is not clear what planning process has been undertaken to reach this apparently unfounded conclusion.

Xii. The site is located partly within Flood Zone 1 and partly within Flood Zone 2 (no hazard and no depth). This assessment conflicts with the EA flood maps which identify a FZ2 category which is inappropriate for highly vulnerable uses. Ecology It is noted that Magic.gov

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identifies that there are 2 area of priority habitat immediately adjacent to the site Priority habitat deciduous woodland and that part of it is and that it is identified habitat for turtle doves which area priority species. It is not clear that an assessment has been made of the potential impact of the proposed allocation on ecology.

Summary  
 Not sustainable development or accessible location  
 Inaccessible location reliant on private car  
 Open Fen landscape and appeal history of refusal in relation to visual impact  
 Site at flood risk  
 Unclear and incomplete site assessment process  
 Leading to Unsound conclusions

Response Number	271	Respondent Number:	2793	Comment Author:	Richard Barlow	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		Please note my objection to the inclusion of the Bleu Raye Farm site as a possible location for a travellers Site. As a Whaplode Parish councillor, I have heard the strong objection to it by residents of Whaplode St Catherine's, who rightly feel it was sneaked into the Local Plan at the last minute to avoid controversy.  As the site has been repeatedly turned down for residential use, it must likewise, for the same reasons, be refused planning for a Travellers site. For this reason there is no point in keeping it within the final agreed Local Plan.	The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).  It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	272	Respondent Number:	2793	Comment Author:	Barlow Family	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Travellers Site - Bleu Raye Farm, Millgate, Whaplode, Spalding, Lincs PE12 6RY Please note our our objection to the inclusion of this site within the draft Local Plan. The site does not tick any of the boxes which would make it suitable, but does nearly all those reasons for it not being. As residential planning permission has been refused many times for the site, so the same reasons apply for its unsuitability for a Travellers site, along with many other additional reasons. The site must be withdrawn from the final document.		Officer Comment:	It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.	
Policy Number:	17	Map Number:					Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	273	Respondent Number:	2792	Comment Author:	AJ Mammen	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		Re: Bleu Raye Farm My objections are as follows No pavement in area Narrow entrance to site with deep dyke opposite	The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.		No change to the Local Plan is required.		
Site Allocation Number:				No medical centre in Whaplode	A Medical Centre is available in Holbeach, approximately 5 kms from the site. It is accepted that journeys between this site and such facilities are likely to be made by the private car but it is considered that:				
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>		May affect wildlife i.e. bats, birds	- existing residential Gypsy and Traveller sites in South Holland; and				
Legally Compliant	<input type="checkbox"/>	Positively Prepared	<input type="checkbox"/>	Litter left in fields, on the road	- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.				
Sound	<input type="checkbox"/>	Justified	<input type="checkbox"/>	Please record my comments for OBJECTION	No nearby areas of land are identified as being of importance to nature conservation.				
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input type="checkbox"/>		There is no evidence to suggest that the development of this site as a residential Gypsy/Traveller site for four households would lead to litter being left in feilds or on the road.				
Consistent with national policy	<input checked="" 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	274	Respondent Number:	2792	Comment Author:	Mr S Mammen	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		Re: Bleu Raye Farm OBJECTIONS to proposed Gypsy/Traveller Site on Whaplode Fen 1) No street lighting 2) No pavement 3) Narrow entrance to site 4) Deep dyke opposite entrance 5) Enhanced traffic in area 6) Road not wide enough to take large vehicles  7)Time scale given to object/look at plan 8) Lack of publicity given Please record my objections	The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.  The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).		No change to the Local Plan is required.		
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	275	Respondent Number:	2791	Comment Author:	Mrs S Gill	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>Re: Bleu Raye Farm I am writing with regards to your proposals for a travellers site at the above location, I write with my concerns as below:</p> <p>There is no existing local buses in the area. There are no schools in the immediate area and children would have to be taken to school or walk at least 2 miles to the nearest infants school in Whaplode - There are no shopping facilities in this area and again, the nearest shopping facility is 2 miles walk or 6 miles to Holbeach town.</p> <p>The land in question may be likely to flood and gets very wet during the winter months</p> <p>The proposed entrance to the site, is no wider than one car, and does not allow access for two vehicles to pass at any one time</p> <p>I personally do not believe this to be a suitable site for people who live in caravans to live and believe that they would be more suited to the already existing site in Holbeach.</p>			Officer Comment:	Officer Recommendation:
Policy Number:	17	Map Number:			<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>Evidence does not suggest that the site is liable to flooding - the Environment Agency Flood Map shows it as partly within Flood Zone 1 and partly within Flood Zone 2, and the South East Lincolnshire Strategic Flood Risk Assessment (March 2017) identifies that, in 2115, the site will be exposed to no hazard and no depth.</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>It is not agreed that an alternative allocation should be made at Rose View Drive, Holbeach. There is no evidence that landowners would make land available for such development, the sites is located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan, and it is not agreed that this site would offer materially superior access to facilities.</p>			No change to the Local Plan is required.	
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	276	Respondent Number:	2791	Comment Author:	Mr R Gill	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	<p>Re: Bleu Raye Farm I am writing with regards to your proposals for a travellers site at the above location. My personal concerns are as below: -</p> <p>There is no existing local buses to this area. There are no schools in the immediate area and children would have to be taken to school or walk at least 2 miles to the nearest infants school in Whaplode/ Moulton Chapel. There are no shopping facilities in this area and again, the nearest shopping facility is 2 miles walk or 6 miles to Holbeach town. There are no street lights in this area which remains very dark after 3pm and is not safe for children or adults to walk the streets to their homes.</p> <p>The land in question may be likely to flood and gets very wet during the winter months.</p> <p>The nearby residents will be concerned for the safety of their own homes and, in particular, are concerned that their properties may devalue because of the proposed site - The local farmers who farm up to this site, with exception to the landowner who is selling the land, is concerned that his crops may be damaged, which in turn affects his lifestyle.</p> <p>Whilst I acknowledge that every person has a right to live in their area of choice, due to the nature of this site, and its potential to flood, no existing local buses to the area, no local schooling, no street lighting, no shopping facilities, no doctors/dentists etc. On this occasion, I do not believe that this is a suitable site for the travelling community in which to live.</p> <p>I believe that there is already an existing site in Holbeach, which in my opinion is safe, secure and readily available for travelling families. The site is close to the local schools and Holbeach Academy, local shopping facilities, near to the Doctors surgeries, petrol stations and bus routes to Spalding, Lincoln, Kings Lynn, The Suttons etc. and may potentially be a safer place any children, not only of the travelling community, to play and grown up in. I am not against the local land owner who in my opinion has not done anything wrong other than wishing to sell the land for dwellings in which the travelling community can live.</p>			Officer Comment:	<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>Evidence does not suggest that the site is liable to flooding - the Environment Agency Flood Map shows it as partly within Flood Zone 1 and partly within Flood Zone 2, and the South East Lincolnshire Strategic Flood Risk Assessment (March 2017) identifies that, in 2115, the site will be exposed to no hazard and no depth.</p> <p>There is no evidence to suggest that the development of this site as a residential Gypsy/Traveller site for four households would threaten the security of crops growing in nearby fields, nor the security of nearby homes. Potential loss of property value is not a material planning consideration.</p> <p>It is not agreed that an alternative allocation should be made at Rose View Drive, Holbeach. There is no evidence that landowners would make land available for such development, the sites is located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan, and it is not agreed that this site would offer materially superior access to facilities.</p>	
Policy Number:	17	Map Number:		<p><b>Do you consider that this part of the Local Plan is</b></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>			<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>			
Site Allocation Number:		Compliant, Sound, Duty to Cooperate explanation:								
Proposed changes to make compliant or sound:										
Participate in Examination:		<input type="checkbox"/>								
Why wish to participate										
Officer Recommendation:										
No change to the Local Plan is required.										

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	277	Respondent Number:	2796	Comment Author:	Mr D Thompson	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	72	<p>The site is in the middle of nowhere, there is no shops, no buses, no footpaths. Without a car you are isolated here. It is not fair to expect people to drive everywhere and taxi would be very expensive out of town.</p> <p>School is full and Doctors and cannot be accessed easily or safely.</p> <p>Local road is a accident hotspot.</p> <p>It hasn't appeared on a local plan and looks to be a bit last minute with limited research.</p>	<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to</p>	<p>No change to the Local Plan is required.</p>
Site Allocation Number:						

<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>	
Legally Compliant	<input 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 type="checkbox"/>
		Consistent with national policy	<input checked="" type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

The people at Drain Bank North in Spalding are close to shops, Schools, Doctors all in an established community. Surely this would be better suited for the new potential homes.

Participate in Examination:

Why wish to participate

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

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Response Number	278	Respondent Number:	2795	Comment Author:	Mr P Howard	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:
Policy Number:	17	Map Number:	72	It is in the countryside, in a nature rich rural hotspot.	The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape. No nearby areas of land are identified as being of importance to nature conservation.				No change to the Local Plan is required.
Site Allocation Number:		There are no buses or public transport. No way of walking anywhere. No pavements or street lights.			Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:				
<p><i>Do you consider that this part of the Local Plan is</i></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>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>			<p>Have looked back and cannot see where it has ever been suggested before.</p> <p>Schools and Doctors are all busy and full.</p>				
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Could it not be better with the Spalding development, to add 4 extra homes in a greenfield site? I think it would be better at Drain Bank North in Spalding with an extra site.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
					<p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this</p>				



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particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development, and the site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan.

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Response Number	279	Respondent Number:	1771	Comment Author:	Mr Philip Greswell	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:
Policy Number:	17	Map Number:	72	This is not a good location to put a travellers site because of its location and the fact that it is not suitable position in prime countryside. And there are no schools or services nearby or public transport.		The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape. Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities are available in Holbeach, approximately 5 kms from the site. It is not considered that:			
Site Allocation Number:				Previously Planning Permission was refused for a home in this location.		- existing residential Gypsy and Traveller sites in South Holland; nor			
<p><i>Do you consider that this part of the Local Plan is</i></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>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>		Also why was it not in the original consultation plan of 2016, when people would have had the opportunity to give their views.		- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' offer materially superior access to facilities.			
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	The site would be better if it were an extension of the existing travellers site at Holbeach, where in the future across the road there will be an industrial area development as referred to in the Plan. This would provide access to existing facilities and services and for a better community, which would be of benefit to the families and their children. The industrial area to be developed across the road would also provide employment opportunities for them. There is also spare capacity on the existing site at Spalding where people can settle within an existing community if they so wished.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
				It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.					
				The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).					
				It is not agreed that an alternative allocation should be made at Rose View Drive, Holbeach or Drain Bank North, Spalding. There is no evidence that landowners would make land available for such development, both sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan, and it is not agreed that these sites would offer materially superior access to facilities.					
						No change to the Local Plan is required.			

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	280	Respondent Number:	2797	Comment Author:	Mr M Holloway and Mrs B Chapma	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:
Policy Number:	17	Map Number:	72	<p>Consultation Period. We believe this plan is to be submitted on 22nd May. This plan only came to light on 20th April this year via both the Spalding Guardian and at our local Parish Council meeting. We feel that the length of consultation for this plan to be unacceptable.</p> <p>Highway Safety. Although we believe this has been approved by the Highways Agency, according to Topic Paper / Provision fo gypsy's travelers and travelling show people in the South East Lincolnshire Local Plan 2011/2036: public version (2017). Can refer you to page 3, section 5 'Identifying Sites 5.1, No IX' "Not prejudice highway safety or give rise to problems of parking or highway access." We would like to point out that the road approaching he proposed site at Bleu Raye Farm is only a single track road with no centre marking, lighting or footpaths.</p> <p>Access to Amenities. Can we now refer you to page 3, section 5 'Identifying site 5.1, No X "Provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport. The proposed site at Bleu Raye Farm contravenes the above recommendations in all areas.</p> <p>Existing Planning Refusal in immediate area. According to two articles in the Spalding Guardian. Planning has previously been refused last year for a Mr Rous to create a site for holiday log cabins and touring caravans in Millgate, Whaplode which is on the same road as the proposed Bleu Raye Farm site. (Article published 28/3/2017 - online) Planning was refused for a moblie home and planning consent to live in a converted stable bloc at Bleu Raye Farm which is immediately adjacent to the proposed site. (article published 1/5/2017 - online) In summary We feel the site is unacceptable by your own guidelines and should not be considered suitable.</p>		<p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p>		<p>No change to the Local Plan is required.</p>	
<p><b>Do you consider that this part of the Local Plan is</b></p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Soun <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policv <input type="checkbox"/></p>		<p>Compliant, Sound, Duty to Cooperate explanation:</p>		<p>Proposed changes to make compliant or sound:</p>		<p>Participate in Examination: <input type="checkbox"/></p>	
<p>Why wish to participate</p>									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	281	Respondent Number:		Comment Author:	Mr Colin Pearson	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>I do not believe it is compliant. My concern is for local wildlife and unprotected countryside, we are responsible for maintaining the natural habitat for all the local birds of prey, owls, bats.</p> <p>The position of the site is unsafe, it is a national speed limit, obscured view and narrow.</p> <p>Restricted access for fire brigade, Home Farm burnt down in 2005 because of poor access, restricted services.</p> <p>It is not sustainable in this rural area.</p>	<p>Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation.</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>Lincolnshire Fire and Rescue – Fire Protection Department indicates that it has no issues with the site allocation. They indicate that the fire in 2003 was a building and a fire tender has sufficient water on board to tackle a caravan fire.</p> <p>Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	Should be near existing built up areas on edge of a town, less affect on wildlife and will allow better quality of life for those that need community integration and access to schools and shops.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	282	Respondent Number:		Comment Author:	Mr Eric A Markham	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>I wish to object against the proposed travellers site at Bleu Raye Farm in Millgate, Whaplode. I feel this development would put a big strain on the local facilities. Local Schools &amp; Doctors are already full.</p> <p>Access to facilities is very limited. There is no public transport along the road and the travellers would be relying on use of motor vehicles to get to local facilities. The road at Millgate is very narrow, anybody walking down the road could be in danger due to the size of the road and the lack of a footpath.</p> <p>I feel the proposed plan will have a negative impact on the village and on the environment. The proposed site is in a rural location and development would be against local &amp; national plans.</p>	<p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	283	Respondent Number:		Comment Author:	Mr Bill Bell	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>I wish to raise objections to the proposed travellers plan in Millgate Whaplode at Bleu Raye Farm. I believe the development is against all Local &amp; National plans. The development is not sustainable. It is not sustainable on the local facilities or on the local environment. The rural countryside will be ruined forever should this go ahead.</p> <p>There is a lack of shops, doctors, schools and other facilities. The nearest facilities are limited in Whaplode and in Holbeach, to get there, you are reliant on a car.</p> <p>There has been a history of applications on the site for dwellings all of which have been rejected. Why now after all these rejections is the site suitable?</p> <p>The site chosen for travellers has had very little thought &amp; consideration.</p>	<p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	284	Respondent Number:		Comment Author:	Ms Veronica Lutton	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:	17	Map Number:	72	Unsuitable for one home so is unsuitable for 4 homes.	It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.		No change to the Local Plan is required.			
Site Allocation Number:				In an unsuitable rural location along way from schools, shops, no bus route, is an isolated situation with no footpaths.	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.					
<p><b>Do you consider that this part of the Local Plan is</b></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>				<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	Would be better placed on an existing, established site, for example, the site in Spalding by the by pass at Drain Bank North.									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										
	Not been on a consultation plan since 2016. It is nearly like shutting the barn door after the horse has bolted.				The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).					
					It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.					

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	285	Respondent Number:		Comment Author:	Mrs Brenda Pearson	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>I would like to bring to your attention the worries I have about the proposed site in Mill Lane. I fail to see why it should be built where there are no shops. I dont see how putting the site on Mill Lane will enhance the lives of the people moving there. No schools close by. No shops, nothing at all.</p> <p>The roads are very narrow there, and vehicles pulling in and out of there not far from the junction is an accident waiting to happen. The traffic will increase and the roads are so narrow with cars and caravans trying to pass each other will be impossible, someone will end up in the drain thats right beside the road.</p> <p>I cant get a Doctors appointment for weeks now. I feel there must be a far better place for you to put the site.</p>	<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. Nonetheless, the capacity of local GP surgeries is likely to need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Soun <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	I think you an find a better place to put the site that is nearer to schools, shop and doctors, that can cope with extra people.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									



**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number: 286    Respondent Number:    Comment Author: Miss Emma Dixon    Client:    Web Link:

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

Policy Number: 17    Map Number: 72    There are no footpaths and there are no buses. Public Transport is unavailable.    Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:  
- existing residential Gypsy and Traveller sites in South Holland; and  
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

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

Legally Compliant     Positively Prepared   
 Sound     Justified   
 Prepared in accordance with Duty to Cooperate     Effective   
 Consistent with national policy

There is a shortage of space in schools and doctors, neither of which are local.  
 Not good in prime countryside and in a location which is rural.  
 This site was not included on the original consultation plan.

No change to the Local Plan is required.

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:  
 If the site is unsuitable for one house/home by planning, it can't be suitable for 4 homes.  
 It would be better situated near local services such as doctors, shops, schools and local bus routes, ideally on the established site on Drain Bank North, Spalding.

Participate in Examination:   
 Why wish to participate:

The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).

The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.

The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	287	Respondent Number:		Comment Author:	Mr Gary Tune	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>No notice has come to me regarding application.</p> <p>The site is next to a nursery, which would affect the business.</p> <p>The road is narrow.</p> <p>Planning for house has been refused Ref APP/A2525/W/16/3162106</p>			Officer Comment:	<p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p> <p>There is no evidence to suggest that the development of this site as a residential Gypsy/Traveller site for four households would adversely affect a nearby nursery.</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>
Policy Number:	17	Map Number:	72	Officer Recommendation:	No change to the Local Plan is required.				
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	Site should be close to shops, schools, a town, such as Drain Bank North, Spalding.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	288	Respondent Number:		Comment Author:	Mr Keith Welch	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:			Officer Recommendation:	
Policy Number:	17	Map Number:	72	<p>I believe this is wrong because it was not included in the first 2 public consultations on the 20 year plan and only entered at the very last moment.</p> <p>The site has no Public footpaths so there will be a reliance on a motor vehicle, which is against local policy. The site is in open countryside land deprived from any existing settlement. The site is a considerable distance to the local school in Whaplode, the nearest Doctor is in Moulton &amp; there is no bus's or public transport.</p> <p>The site has been turned down for planning permission 3 times, previously for 1 home. How can it be suitable for 4 homes or caravans.</p>			<p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>		
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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>I believe if needed a settlement of this kind is needed, it would be on a established site, such as Drain Bank North in Spalding, Lincs. I also believe a site should have been added to the original 20 year plan and given due Public Consideration of 18 months, not added at the last Minute which will have a detrimental affect on surrounding area &amp; the open countryside.</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	289	Respondent Number:		Comment Author:	Mr K Prince	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		Re: Blue Raye Farm I feel it would be a bad idea to develop Bleu Raye Farm as it does not fulfil criteria such as it has no bus route, no nearby local shops.	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:		No change to the Local Plan is required.		
Site Allocation Number:				The schools are full and so is the doctors surgery.	- existing residential Gypsy and Traveller sites in South Holland; and				
				It would also have a negative impact on the surrounding countryside.	- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.				
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	The families would be better suited to an already existing site on Drain Bank North Spalding. This site has 12 families living on it already with planning permission and the infrastructure for a further 4 families. They would have better access to shops, several schools and doctors surgeries. The flood risk has no foundation as the council has already given planning permission to develop the site.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
				The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).					
				The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.					
				It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.					

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	290	Respondent Number:		Comment Author:	Miss Donna Edwards	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	<p>As a resident of Whaplode St Catherines, I write to make my views known on the above planning application. I have examined the plans and I know the site. I wish to object strongly to the proposed traveller site in the village. The Government Policy on the provisions of such sites clearly states that they must: "enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure." As there is no public transport to the village the residents of the site would not have access to the local services. It is therefore, my opinion that the proposed site falls short of providing adequate and appropriate access to essential services as outlined by the above policy provision. We understand the Parish Council share these concerns regarding the suitability of this site.</p> <p>2016 plan wasn't on it or on the revision. It has been put in at the last minute.</p> <p>It does not meet Government guidelines, in this case the local education provision at all levels is already at capacity, or close to. Getting access to a GP is already difficult. Appointments are limited because of the GP to patient ratio.</p>			Officer Comment:	<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>It is assumed that the existing sites referred to by the</p>	
Policy Number:	17	Map Number:	72	Officer Recommendation:	No change to the Local Plan is required.					
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	A site closer to a larger town where there is more provisions, ie bus route, easy access to GPs and Schools, that is already existing sites with space already.									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

objector are Rose View Drive, Holbeach and Drain Bank North, Spalding. It is not accepted that these sites are more suitable than the allocated site, because:

- there is no evidence that landowners would make land available for such development;
- these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and
- it is not agreed that these sites would offer materially superior access to facilities.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	291	Respondent Number:		Comment Author:	Ms D Manser	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:	17	Map Number:		Re: Bleu Raye Farm This will be detrimental to any family being moved to this address. There is no street lighting, public transport, buses etc.	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:		No change to the Local Plan is required.			
Site Allocation Number:				No safe entrance/exit as road is very narrow - we very rarely choose this route as road is unsafe.	- existing residential Gypsy and Traveller sites in South Holland; and					
<p><i>Do you consider that this part of the Local Plan is</i></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>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>		I have also noted online that the nearest schools are already 'oversubscribed' as is the doctors/dentist etc.		- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.				
Compliant, Sound, Duty to Cooperate explanation:										
Proposed changes to make compliant or sound:	My suggestion would be: They would be happier among their own community and as there is already spaces available on a purpose built site at Drain Bank North Spalding. Hardstanding, water, electric, security and easy access to main road to Peterborough town centre and Spalding for shops and amenities such as schools etc.									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										
					The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.					
					The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).					
					It is not accepted that Drain Bank North, Spalding is more suitable than the allocated site, because:					
					- there is no evidence that a landowner would make land available for such development;					
					- this site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan; and					
					- it is not agreed that this site would offer materially superior access to facilities.					



**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	292	Respondent Number:		Comment Author:	Mrs L Moore	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content		Officer Comment:		Officer Recommendation:	
Policy Number:	17	Map Number:		Re: Bleu Raye Farm In my opinion this site is unsuitable because of a lack of infrastructure. This road has no footpaths, street lighting. There is no public transport to this site.		Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:		No change to the Local Plan is required.	
Site Allocation Number:				An increase in traffic on this already dangerous road would be disastrous.		- existing residential Gypsy and Traveller sites in South Holland; and			
				Local schools are services are already oversubscribed.		- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.			
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	This site would be better situated nearer a town with facilities available for people to use. The people using this site need to be near schools, doctors, public transport etc. This site does not meet government criteria for travellers sites.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	293	Respondent Number:		Comment Author:	Mr R Bell	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>I do not believe the proposed Bleu Raye Farm travellers site is a sustainable development. The proposed development is in a rural location many miles from any facilities. There is no public transport and no footpaths. Reliance for transport would be on the use of motor vehicles.</p> <p>The development would have a massive negative impact on the rural countryside and its landscape character.</p> <p>As recently as March 2017 an appeal on Bleu Raye Farm (Appeal ref: APP/A1414/A/10/2142896) was rejected because of the unacceptable impact on the countryside. If a single dwelling would have a negative impact then 4 travellers site would have ever more of a negative impact.</p> <p>The increased impact on the road would present existing users even more danger. Road is small and narrow with barely enough room for 2 cars let alone cars and pedestrians.</p> <p>No notice or public consultation has been given. The development has been sneaked into the local plan.</p>			Officer Comment:	Officer Recommendation:
Policy Number:	17	Map Number:			<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)'</li> </ul> <p>do not offer materially superior access to facilities.</p> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p>			No change to the Local Plan is required.	
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:									
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	Because I wish my objections to be heard.								

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	294	Respondent Number:		Comment Author:	Mrs A Tune	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm 1) Where is the notice? This has been pushed through at the last minute without informing all affected members of the community.		The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).			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 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 checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>		<p>2) This is an inappropriate site for a group of families to live in. 60mph road that is narrow, no facilities nearby.</p> <p>3) Planning has been refused before for a dwelling so why is it suddenly okay now? Re: APP/A2525/W/16/3162106.</p> <p>4) A traveller community next to a nursery? Will you be compensating the nursery/house opposite? And clearing up the waste?</p> <p>5) The alternative site at Spalding is a much better proposal. Use common sense.</p>			<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities are available in Holbeach, approximately 5 kms from the site. It is not considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; nor</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' offer materially superior access to facilities.</li> </ul> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that a residential Gypsy/Traveller site is an unsuitable use to be established close to a nursery. Potential loss of property value is not a material planning consideration.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	To use a better sited place - Drain Bank North, Spalding - which has better facilities, is nearer to shops/doctors/bus services.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	295	Respondent Number:		Comment Author:	Mr John Baker	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Bleu Raye farm is not suitable as it does not provide occupants with access to education, shops, recreational facilities and employment as says preferably by walking, cycling or public transport. There is not Bus on route, no public footpath no street lights, they no safe means of walking or cycling as the road is a 60mph, and as we are aware the council will not be putting any in		Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:		No change to the Local Plan is required.	
Site Allocation Number:				This was not positively prepared as we was not given not, it was not int the revision January 2016 or in June 2016. Adjoining properties was not informed and was only given 45 days notice..		- existing residential Gypsy and Traveller sites in South Holland; and			
<p><i>Do you consider that this part of the Local Plan is</i></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Soun <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 checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policv <input checked="" type="checkbox"/></p>		<p>The the road has had several planning applications turned down.</p>		<p>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</p>			
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	The site could be moved to the Drain Bank North Which have spaces and room to extend which is closes to schools, buses and health care, closer to a main road for commercial use.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
				<p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p>		<p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p>			
				<p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>					

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	296	Respondent Number:		Comment Author:	Mrs J Bell	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content		Officer Comment:		Officer Recommendation:	
Policy Number:	17	Map Number:	72	<p>I wish to raise an objection against the proposed travellers site at Bleu Raye Farm, Millgate. I believe this development will have a massive negative impact on the countryside and rural landscape. This is a complete contradiction of all local plans.</p> <p>The proposed site is nowhere near any local facilities. The nearest being two petrol stations in the middle of Whaplode. This development would not help promote sustainable patterns of development or reduce the need to travel, especially by car, as sought by the local plan.</p> <p>Plans to develop the land have been rejected numerous times by the council, the latest being APP/A2525/A10/2142896, If the land isn't sustainable for one dwelling how is it sustainable for many development.</p>	<p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p>	<p>No change to the Local Plan is required.</p>			
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	298	Respondent Number:		Comment Author:	Mrs R Ayres	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm 1) No public transport in the area 2) There are no schools for the children and doctors and shops are 2.3 miles away. 3) No buses or footpaths	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.		No change to the Local Plan is required.		
Site Allocation Number:				4) Not a good position for prime countryside and rural location	The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.				
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input checked="" type="checkbox"/> Justified <input checked="" type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" type="checkbox"/>		5) Not included on original consultation plan	The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).				
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	6) The site would be better on an established camp, nearer shops and schools. The Drain Bank Site in north Spalding. 7) Planning has said the site was unsuitable for one home, so how can it be suitable for four homes?								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	300	Respondent Number:		Comment Author:	Mr G Ayres	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	72	Site Allocation Number:		Re: Bleu Raye Farm	1) The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape. Neither the site itself, nor any nearby areas of land are identified as being of importance to nature conservation.	No change to the Local Plan is required.
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<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>	
Legally Compliant	<input 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 type="checkbox"/>
		Consistent with national policy	<input checked="" type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

6) This site would be better serviced it is was placed nearer to Spalding

7) There is a site in Drain Bank North, Spalding that would be a better place for this plan.

8) As planning has been turned down for 1 home, how can it be passed for 4 homes?

Participate in Examination:

Why wish to participate

1) As this rural land, I don't think this is a good place for the site to be built

2) There is no transport to the area

3) There is no schools or doctors in the area

4) The roads are not very wide and no footpaths

5) This site was not included in the original plan

2) Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

3) The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).

4) The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.

5) The evidence that underpins the allocation (the

No change to the Local Plan is required.

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).

6) It is not agreed that an alternative allocation should be sought nearer to Spalding, because: there is no evidence that landowners would make land available for such development; the land which surrounds Spalding is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan; and it is not agreed that a site nearer to Spalding would necessarily offer materially superior access to facilities.

7) It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

8) It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.



**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	301	Respondent Number:		Comment Author:	Mrs A Markham	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>1) Lack of infrastructure e.g. schools/doctors/shop/post offices 2) No public transport</p> <p>3) Not good for the environment</p> <p>4) History of rejecting housing applications on site</p>			Officer Comment:	
Policy Number:	17	Map Number:	72				Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	Council must find somewhere better that meets government policy, that states near shops, schools, public transport etc. or they could use existing sites, and it should or could be easier for them to integrate.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
					<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape. No nearby areas of land are identified as being of importance to nature conservation. The site is located just over 1 km from a Scheduled Ancient Monument, but it is not considered that its development would adversely affect this heritage asset.</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is assumed that the existing sites referred to by the objector are Rose View Drive, Holbeach and Drain Bank North, Spalding. It is not accepted that these sites are more suitable than the allocated site, because:</p> <ul style="list-style-type: none"> <li>- there is no evidence that landowners would make land available for such development;</li> <li>- these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and</li> <li>- it is not agreed that these sites would offer materially superior access to facilities.</li> </ul>				

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	302	Respondent Number:		Comment Author:	Mr D Moore	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm I believe this site is not sustainable. There is no infrastructure, no footpaths or street lighting. There is no public transport to this site.	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:		No change to the Local Plan is required.		
Site Allocation Number:				The local schools, doctors and other services are all full and cannot cope with more residents in the area	- existing residential Gypsy and Traveller sites in South Holland; and				
				It would increase traffic on an already dangerous road.	- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.				
<p><i>Do you consider that this part of the Local Plan is</i></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>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	The site is Bleu Raye Farm does not meet government guidelines and therefore would be better sited near a town where people would have access to nearby schools, healthcare, supermarkets etc. There is no public transport to this site to access any of these services.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
					The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).				
					The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.				

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	303	Respondent Number:		Comment Author:	Mr A Roffe	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm I consider the Local Plan is unsound for a number of reasons which are detailed below ... - The proposed site doesn't give the travellers access to local amenities such as a local shop - Limited access to local school - Limited access to doctors - The site is on a busy road which is narrow and has a 60mph speed limit - The road is not lit and there are no pathways so would be unsafe for children and adults trying to walk to Holbeach - The site is not on a bus route All of these items means that the travellers are not being offered a site that gives them opportunities to have an adequate and safe area to live.		Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.		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 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 checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	To make this site sound then a number of changes would need to be made. To enable a safe road then pathways and lighting would need to be implemented which would further restrict the size of the road. Also new bus routes would need to be created to enable the travellers access to towns. Ideally though it would be better to consider other local sites that have better access to shops, doctors, schools etc. Thought should be given to expand these existing sites before substantial investment is given to this proposed location.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	304	Respondent Number:		Comment Author:	Mrs N Roffe	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm The site is unsuitable for the travelling community for the following reasons: - The road has no street lighting - The road has no pathways and is therefore dangerous - The road is too narrow - The road has a national speed limit in existence - There are no transport links - There are no local schools within walking distance - The doctors surgery is too far away to walk to	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.  It is assumed that the established sites referred to by the objector are Rose View Drive, Holbeach and Drain Bank North, Spalding. It is not accepted that these sites are more suitable than the allocated site, because: - there is no evidence that landowners would make land available for such development; - these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and - it is not agreed that these sites would offer materially superior access to facilities.		No change to the Local Plan is required.		
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	I believe this site is unsuitable because anybody living here will be isolated. They will be unable to access local amenities easily as there are no transport links, cycling and walking will be dangerous due to the lack of lighting, paths and speed and volume of local traffic. There are already some established sites in the local area that are much more suitable as they are closer to schools, shops, doctors surgeries								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	305	Respondent Number:		Comment Author:	Mr J Clifton	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm - Not on 2016 plan or revision.	The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).		No change to the Local Plan is required.			
Site Allocation Number:				Negative impact on countryside area rich in wildlife, birds, birds of prey, owls, pheasants - As a keen countryman I feel this development would have a detrimental impact on the recently implemented English Partridge Reintroduction Project	Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation.					
<p><i>Do you consider that this part of the Local Plan is</i></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>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>		I feel the basic rights of those who would be on the site have not been fully considered as the area has no services, buses, lights, footpaths etc.		Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:				
Compliant, Sound, Duty to Cooperate explanation:										
Proposed changes to make compliant or sound:	I feel it would be better to site this proposal near an existing site with better provisions of services, schools, roads, hospitals GPs. Any sites with space should be allocated and used first and consider expanding existing sites.									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										
				There is no evidence that landowners would make land available for the expansion of existing Gypsy/Traveller sites within the Plan area. Many of the Plan area's existing sites are also located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan. Lastly, it is not agreed that existing Gypsy/Traveller sites within the Plan area offer materially superior access to facilities.						

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	306	Respondent Number:		Comment Author:	Mrs K Slator	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm Concern for wildlife and the site is poorly served by public transport. The main concern for wildlife and insects is the disturbance to nesting and environment which sustains the bird, small mammal and insect population, as such the plan to locate a transient community on a piece of land rich in wildlife is unsound. This does not meet with government NPPF para 17 point 5 which requires consideration of the character of the countryside: "recognising the intrinsic character and beauty of the countryside".		Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation.		No change to the Local Plan is required.	
Site Allocation Number:						<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p>			
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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>In the interest of promoting wildlife, particularly endangered species, land should not be disturbed with continuous movement not allow the established wildlife to thrive. In the interest of diversity, all communities should be served by the local authority with sufficient infrastructure to ensure good transport links and a safe environment for children to grow. This site does not provide good transport links and the roads are hazardous for children playing and a site which take these elements into consideration would be better for the community to be housed</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	307	Respondent Number:		Comment Author:	Mr S Slator	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm Disturbance of wildlife and environmental concerns e.g. ground nesting birds (i.e. skylarks, grey partridge which is on RSPB red list), insects and other fauna dependant on ground which is not subject to intensive farming. Also small mammals on which predators depend (e.g. barn owls, kestrels) also larger mammals e.g. hares, roe and munt jack deer of which there are small populations resident in the area of the proposed site.	Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation.		No change to the Local Plan is required.			
Site Allocation Number:					Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:					
<p><i>Do you consider that this part of the Local Plan is</i></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>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>				<p>- existing residential Gypsy and Traveller sites in South Holland; and</p> <p>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</p>				
Compliant, Sound, Duty to Cooperate explanation:										
Proposed changes to make compliant or sound:	Due to the lack of existing facilities (i.e. public transport, unsafe road) and does not agree with government policy NPPF para 17 point 5 recognising the character of the countryside.									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										
					The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.					
					The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.					

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	308	Respondent Number:		Comment Author:	Mr I Laxton	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm The proposed site is very remote and distant from any amenities. The site has a total lack of facilities, schools, doctors, shops and no public transport.	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:		No change to the Local Plan is required.		
Site Allocation Number:				Also the access road is very narrow.	- existing residential Gypsy and Traveller sites in South Holland; and				
<p><i>Do you consider that this part of the Local Plan is</i></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>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>		<p>This site has a history of rejected housing applications.</p> <p>I believe it could have a negative impact on the environment.</p>		<p>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</p>			
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	I think that locally there are established sites with the facilities and amenities in place that would be more suitable with less isolation.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
					<p>The Highway Authority does not consider that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape. No nearby areas of land are identified as being of importance to nature conservation.</p> <p>The objector does not identify the 'established sites' to which he refers, but it is assumed that that he may mean Rose View Drive, Holbeach or Drain Bank North, Spalding. It is not agreed that these locations are more suitable than the allocated site, because:</p> <ul style="list-style-type: none"> <li>- there is no evidence that landowners would make land available for such development;</li> <li>- these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and</li> <li>- it is not agreed that these sites would offer materially superior access to facilities.</li> </ul>				



**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	309	Respondent Number:		Comment Author:	Mrs E Laxton	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Re: Bleu Raye Farm I believe this site has a total lack of facilities: schools, doctors, shops and public transport. The proposed site is very isolated and distant from local amenities.	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:		No change to the Local Plan is required.		
Site Allocation Number:				I also think it will have a negative impact on the environment.	- existing residential Gypsy and Traveller sites in South Holland; and				
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>		This site also has a history of rejected housing applications.		- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.			
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	I think there are better and established sites that have far more appropriate facilities. There must also be spare capacity at existing sites either in Spalding or Holbeach which would offer better access and facilities and not so isolated.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
			The access to the proposed site is very narrow.		The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape. No nearby areas of land are identified as being of importance to nature conservation. The site is located just over 1 km from a Scheduled Ancient Monument, but it is not considered that its development would adversely affect this heritage asset.				
					It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.				
					The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.				
					It is not agreed that Rose View Drive, Holbeach or Drain Bank North, Spalding are more suitable than the allocated site, because:				
					- there is no evidence that landowners would make land available for such development;				
					- these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and				
					- it is not agreed that these sites would offer materially superior access to facilities.				

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	311	Respondent Number:	2798	Comment Author:	Mrs A Matts	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	RE: A proposed gypsy/traveller site on Whaplode Fen The objections for above proposal are: 1. The proposed development is considered to be inherently unsuitable given its location in the open countryside outside of the development boundary of any settlement as outlined in the adopted South Holland Local Plan, 2006. 2.  It is not on a regular public transport route. As a consequence, future occupiers would be likely to have a high dependence on the use of motor vehicles to access local services which no matter the distance of travel involved, would be contrary to one of the core planning principles of paragraph 17 of the National Planning Policy Framework to make the fullest use of public transport. 3. The reliance on the motor car would increase carbon emissions, contrary to the requirements of the environmental role of planning.		The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.  Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.		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 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 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:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	312	Respondent Number:	2798	Comment Author:	Mr I Matts	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				
Policy Number:	17	Map Number:	72	RE: Land at Bleu Raye Farm, Mill Gate, Whaplode Fen: allocated as a Proposed Residential Gypsy/Traveller Site', to provide accommodation for four households (Inset Map No. 72) I am writing to state my objection to the above proposal. Within the South East Lincolnshire Local Plan 2011-2036 it states that: Planning permission will be granted for proposals on allocated and unallocated sites provided that they: 1. provide occupants with an acceptable standard of amenity; 2. are not located adjacent to uses likely to endanger the health of occupants, such as a refuse tip, water recycling centres or contaminated land; 3. will be adequately provided with appropriate infrastructure such as electricity, drinking water, waste water treatment and recycling/waste management; 4. respect the scale of the nearest settled community; 5. will not have a significant adverse effect on the amenities of existing local residents or adjoining land users; 6. will not place undue pressure on local infrastructure; 7. will be successfully assimilated into both their immediate environs and the wider landscape; 8. will not adversely affect heritage assets or areas of importance to nature conservation; 9. will not prejudice highway safety or give rise to problems of parking or highway access. Planning permission will be granted for: A. sites for permanent residential use if they: i. Provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport ii. Are suitable (or capable of being made suitable) for mixed residential and business use; iii. Are not located within Flood Zone 3a or 3b; or iv. Are located in Flood Zone 2 and the Sequential and Exception Tests have been passed;  However, one of the two areas of land identified as meeting these needs within the Local Plan - Land at Blue Raye Farm, Mill Gate, Whaplode Fen, fails to meet the majority of the criteria identified within the Plan. 1) It does not provide occupants with an acceptable standard of amenity, with very little in the way of local amenities  2) It is not adequately provided with appropriate infrastructure such as electricity, drinking water, waste water treatment and recycling/waste management as the site is located in open countryside outside the development boundary of any local settlement.				Officer Recommendation:	
Site Allocation Number:								1) The Local Plan's glossary defines 'amenity' as "a positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquility". It is considered that the allocated site will provide its occupants with an acceptable standard of amenity.  2) It is expected that waste water will be dealt with by septic tanks. There is currently a three-phase electrical supply to the site, which will be capable of serving four households. Anglian Water Services Ltd. comments that four domestic connections to the potable water supply network can be supplied at this location without the need for reinforcements to be made to the existing network.  3) It is not agreed that the development of the allocated site would have significant adverse effects upon the amenities of existing local residents or adjoining land users. The majority of neighbouring land is in agricultural use or is in the ownership of the site owner. There are two adjoining or nearby dwellings but these dwellings and their curtilages are sufficiently distant from the allocated site and there are sufficient existing trees/shrubs to mean that any impacts will not be unacceptably severe.  4) The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).	
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input checked="" type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

3) It will place undue pressure on the amenities of existing local residents or adjoining land users as already stated, Whaplode St Catherine has very little in the way of amenities

4) It will place undue pressure on local infrastructure as these are poor and limited in this area. The two nearest primary schools are both oversubscribed and there is high demand for local GPs.

5) It will prejudice highway safety or give rise to problems of parking or highway access due to the narrow width of Millgate, restricted views and the potential increase in vehicle movements.

6) It would not provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport due to the distance it is located from these, the lack of local availability/supply and limited public transport in the area.

7. It is located within Flood Zone 2. Caravans are potentially more vulnerable in a flood event.

5) The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.

6) Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

7) The Environment Agency Flood Map shows the site as partly within Flood Zone 1 and partly within Flood Zone 2, where permanent residential caravans will be appropriate provided the Sequential and Exception Tests have been passed. Under the 'Sequential Test' the site should not be allocated if there are reasonably available sites appropriate for the use in areas with lower probability of flooding. The Topic Paper - Provision for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) identifies that there are no alternative sites which are at lower probability of flooding, and which are available and suitable. Thus, the Sequential Test is passed. The 'Exception Test' is passed if the development provides wider sustainability benefits to the community that outweigh flood risk, and a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime. It is considered that the benefits that accrue from meeting objectively assessed needs for accommodation for Gypsies and Travellers outweighs flood risks. A site-specific flood risk assessment would be required at the time of a planning application.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	313	Respondent Number:	1163	Comment Author:	A. R. Yarwood	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		<p>We do not consider that the Plan is sound, because it is not positively prepared, justified, effective or consistent with National policy as set out in DCLGs Planning Policy for Traveller Sites (PPTS). Our main criticism is that the assessment of need for Traveller pitches is fundamentally flawed. We do not accept that the assessment is a robust analysis of need. The reduction in assessed need from 97 permanent pitches and 10 transit pitches (as set out in the previous Draft for Consultation) to a mere 4 permanent pitches does not stand up to scrutiny.</p> <p>It is evident that the assessment is unsound as can be discerned from the acknowledgment in the supporting text (although not reflected in policy) that there may be a further unknown need for up to 16 additional residential pitches for gypsy and traveller households ..... Which may arise from gypsy, traveller and travelling showpersons households who were not interviewed by the GTAA consultants.</p> <p>The introductory clause referring to additional needs... Will be met does not accord with government guidance in Planning Policy for Traveller Sites that criteria for determining applications should be applied irrespective of need.</p> <p>The use of two sets of criteria is confusing and unnecessary.</p> <p>Criterion Aii is unnecessary and unacceptable. It is not essential that every site is suitable for mixed residential and business use. Many Travellers do not need to accommodate their business activity on their pitch.</p>	<p>It is not agreed that the Boston and South Holland Gypsy and Traveller Accommodation Assessment (November 2016) (GTAA) is flawed. The reduction in assessed need which concerns the commentor arises from the change to the definition of Travellers for planning purposes, which was set out in Planning Policy for Traveller Sites (2015) - i.e. the majority of households interviewed did not meet the new definition.</p> <p>It is considered entirely reasonable for the GTAA and Local Plan policy to identify that there may be 'unknown' needs - inevitably some households will not be available for interview or may decline to be interviewed.</p> <p>It is not agreed that the policy does not accord with Government guidance in Planning Policy for Traveller Sites (2015). The sentence "Additional needs which may arise during the Local Plan period will be met through the determination of planning applications on other, unallocated sites" is intended to identify that (because the GTAA indicates that 'unknown' needs are likely to arise) the allocated sites are unlikely to meet all needs for the Plan period.</p> <p>The use of two sets of criteria is essential to distinguish between the differing requirements for permanent residential sites and transit sites.</p> <p>Whilst it is accepted that not all Gypsies and Travellers will operate a business from their home, some will. In this context, it is not considered that criterion ii. Is unreasonable.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	317	Respondent Number:	1689	Comment Author:	Environment Agency	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	The Environment Agency supports Policy 17, which sets out when planning permission will be granted for gypsy, travellers and travelling showpeople in areas at risk of flooding. This is necessary as these sites are likely to be required to be available for occupation all year round, which makes the use more akin to permanent residential use, i.e. a highly vulnerable use as described in Table 2 of the Flood Risk and Coastal Change section of the National Planning Practice Guidance such development should not normally be permitted. As a significant percentage of the area of both the Boston Borough and South Holland District Council is at high probability of flooding it is necessary to set out a clear expectation of when permissions for gypsies, travellers and travelling showpeople will be permitted. We support the approach taken by the JPU with regard to permanent and transit sites in particular flood zones, and the two areas of land identified to meet known needs.		Officer Comment:	The support for the policy is welcomed. The support for the allocations is welcomed.	
Policy Number:	17	Map Number:						Officer Recommendation:	No change to the Local Plan is required.
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	333	Respondent Number:	2799	Comment Author:	Mr W D Wright	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>I do not think the proposal is sound because: On exiting the site large or towing vehicles would find that the B road is narrow and the deep Whaplode river drain in on the opposite side of the road.</p> <p>There are no pavements or footpaths, making walking hazardous with the drain and narrow road. There is no public transport. The nearest bus stop is on the A151 in Whaplode village.</p>	<p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul>		<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 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

<b>Response Number</b>	340	<b>Respondent Number:</b>	2800	<b>Comment Author:</b>	Mr R Exley	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>				
<b>Policy Number:</b>	17	<b>Map Number:</b>	72	<p>There are a lack of amenities within walking distance. The nearest amenities are 3 miles away - It is a rural location so would be reliant on transport to get to amenities - Not on a bus route</p> <p>Road not lit - 60mph limit road - There are no pathways on what is a narrow national speed limit road</p> <p>There is insufficient space at local schools. There is insufficient space at doctors.</p> <p>Planning has already been refused for 1 dwelling so not justified for additional dwellings</p>	<p>Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood</p>				
<b>Site Allocation Number:</b>		<p><b>Do you consider that this part of the Local Plan is</b></p> <p><b>Legally Compliant</b> <input type="checkbox"/></p> <p><b>Soun</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input type="checkbox"/></p>							<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p><b>Positively Prepared</b> <input checked="" type="checkbox"/></p> <p><b>Justified</b> <input checked="" type="checkbox"/></p> <p><b>Effective</b> <input type="checkbox"/></p> <p><b>Consistent with national policy</b> <input checked="" type="checkbox"/></p>
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>	<p>An alternative site already in use would be Drain Bank North, Spalding. The planned site would be better suited in an established community as above to help with support and integration.</p>								
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									



**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	373	Respondent Number:	2813	Comment Author:	Mr R Mcbeath	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:	
Policy Number:	17	Map Number:	72	<p>This entire letter and various complaints and requests by myself relate in question to the Planned/Proposed site on Whaplode Fen put together by South Holland District Council. South East Lincolnshire Local Plan 2011-2036, Inset Map 72 Whaplode Fen. Bleu Raye Farm. First objection to this entire and underhanded attempt to subvert the local residents is the very size of the site you are proposing to plant in the middle of the four properties near the very land. I have proof you as a council receive approx. £6,000 per single traveller pitch you put forward from central government at Westminster. Ministers have begun handing out £6,000-a-caravan incentive payments to local councils which give permission for traveller sites to be built, a senior Whitehall official has revealed. The payments bribes are actually what they are mean town halls will be able to claim tens of millions of pounds of extra taxpayers money in return for clearing the way for sites. Sites are often opened in the face of opposition from local residents, or even deliberately in front of local residents who have proved travellers are given favoured treatment to establish camps where others would not be allowed to build. Stuart Hoggan, deputy director for integration at the Department for Communities and Local Government, accidentally disclosed the use of New Homes Bonus money at a conference in Westminster. In a speech on promoting equality for traveller communities, Mr Hoggan said: For the first time councils are to be rewarded financially for giving planning permission to all public and private traveller sites. The public must not know this or find out was the intention. Daily Mail highlighted this in 2012, along with other news agencies and if you want, I can refer to the actual government paper and how the figures are worked out and actually paid for by everyone's TAX, given back to the council in question to use for their own budgets.</p> <p>I moved here in 2013 after suffering a serious and life changing RTA in London in 2012. I have serious disabilities and suffered brain damage to the extent I have problems with normal human existence where humans are enclosed in too much close quarters to each other. I have a team of professionals and experts who care for me and help me lead as near to normal a life as I can manage with the aid of all the help I get. Your planning department I have discovered have already planned out and are ready to send to parliament a new proposal for the area until the year 2036. You as a</p>				<p>The allocation of the site has not been motivated by potential grant payments from central government. Rather, the Boston and South Holland Gypsy and Traveller Accommodation Assessment (November 2016) identifies that there is a need for the provision of additional residential pitches for Gypsies and Travellers and Planning Policy for Traveller Sites requires Local Plans to identify sites where there is a proven need.</p> <p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p> <p>Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential</p>		<p>No change to the Local Plan is required.</p>
Site Allocation Number:										
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></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 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: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

council are always bleating out in propaganda and advertising how you cater for everyone and are proud of what you achieve for the communities around South Holland. I commend you for this but when you then sneakily and underhandedly try to subvert the local residents of a community with what you are planning for that said community under their noses then you are NOT true to your word or statements of facts you preach to the public in this instance. I have sought out through help and expense a place to live away from human involvement and road noise from a steady stream of traffic. I am unable to hold conversation with more than one person at a time and even then bite size bits of information are all at best I manage, so learning and understanding what is going on in life in front of me is a bit weird and not your concern at this stage. I have learned you planned to set-out a gypsy/Travellers site with-in a stone throw of my property and back garden and you never even had the decency to inform me, and in fact only informed two people in the entire community, my two closest neighbours, and went ahead and have had discussions and even involved various departments with-in your council to rush through this proposal without any thought for the residents or even time for public consolation of said plan. You have had these plans running for over a year, and actually began back in 2011, where the public can see what is planned for their community until the year 2036 and no-where in this entire time did you show the public any plans or investigations you have actually conducted on your own behalf, but public money from government is used to do these studies and plans and set-outs for the future. I refuse to accept your excuse for this sudden rush of planning on your behalf as you did this behind the backs of an entire community. I bet you got a shock at the extent of the public furry and outcry at what you planned to do under everyone's noses, which is NOT a hindsight or mistake on your behalf, but a deliberate attempt to subvert the people of what you are planning for an entire community for the rest of most of this community peoples living lifes. You would NOT have sent out any letters to people affected in the vicinity, my two neighbours who you have on record and file but if need be, I back this statement of fact with proof of said letters you sent to my 2 neighbours, and not even me or anyone else in the area. I have an alarm and fall system in my house which alerts emergency services as I suffer from nerve damage and can suddenly fall over, on occasion, I have woken up in hospital after a serious fall. My neighbour, [name not published for privacy reasons] is on my alert system as first point of contact/responder

Gypsy/Traveller Site will have adverse impacts upon highway safety.

The Environment Agency Flood Map shows the site as partly within Flood Zone 1 and partly within Flood Zone 2, where permanent residential caravans will be appropriate provided the Sequential and Exception Tests have been passed. Under the 'Sequential Test' the site should not be allocated if there are reasonably available sites appropriate for the use in areas with lower probability of flooding. The Topic Paper - Provision for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) identifies that there are no alternative sites which are at lower probability of flooding, and which are available and suitable. Thus, the Sequential Test is passed. The 'Exception Test' is passed if the development provides wider sustainability benefits to the community that outweigh flood risk, and a site-specific flood risk assessment demonstrates that the development will be safe for its lifetime. It is considered that the benefits that accrue from meeting objectively assessed needs for accommodation for Gypsies and Travellers outweighs flood risks. A site-specific flood risk assessment would be required at the time of a planning application.

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for the emergency services through a telephone and intercom system set-up to help me be safe in my own home.

I use [name not published for privacy reasons] garden and wildlife haven he has built and grown for over 40 years and through him and others in the community we have all got involved in helping and preserving the rich and varied species of birds and animals everyone has started to reintroduce into this immediate area, simply by everyone being aware of these issues, and normally a reason why a person can decide to move and live in the countryside. I myself use the animals and birds to help me get through every single day of my life as I am able to sometimes follow the simplicity of their life styles and eating and sleeping patterns. With what you propose to do to the large piece of land behind me you are overstepping your mark in my opinion of being fair or reasonable and in fact you are being down right disrespectful to an entire community and myself for what you plan to do with the site in question.

This is some of the richest and most fertile green-belt lands and fields in the world and with an enormous and ever increasing world population every part of farm land is more precious than your council as a whole, who have decided to refuse every single application with-in a mile of my property over the years, for various forms of buildings and homes etc. I can site all the refusals but you as a planning department already know every person you have refused in the area for years over various issues you have said are wrong with their plans and applications. Main reasons, too far from local shops, too much strain on an overused and stretched community doctor and surgery, too far to travel to nearest shops, and it is part of an extensive flood plain where the area as you know is 1 meter below, to 1 meter above sea level. You have said this to these people over the years so the same is now true to what you plan by sticking a travellers site with pitches in said area you have refused to allow said site owner to build for herself and her daughters future, on various occasions on very same piece of land.

Are you telling me now that by your own admission through various planning applications and refusals sited as a flood plain that you would locate gypsy/traveller families on the very same land that you refused other humans to live on? This is sheer hypocrisy, downright inhuman, and may even be seen as a way of your council saying travellers lifes are not as important as

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others as you are prepared to place them on the very flood plain land that other humans are not allowed to live on by your own council departments refusals of local land owners already from past to present. These same reasons are now what I am telling you are the very reasons for my objections to what you have tried to do under my nose as a resident of the very community you are trying to subvert with unfairness in time allowed for the public to get together and refute or argue or even agree with you on what will affect their community. I believe in all fairness this entire proposal and plan is removed immediately from going any further and is also not allowed to be done for a set time as this would show you as a council are in the job to help and show the entire community you are on everyone's side and not just a minority group that has been given special provisions under our EU rulers at present. I would then like this to be put out to the public for a full and unbiased view of what you are already planning to do with said site.

The actual road onto the site is NOT fit for any more traffic as this is only a single track road in most of the road down to the village of Whaplode. There is NO passing places on said road and the state of said road is an utter disgrace, as is nearly every road in this part of South Holland as you as a council have NOT repaired roads fast enough for the public, as admitted by our very own government departments in Westminster, to the extent we have to now sue our own councils for damages to our cars with entire suspension systems being wrecked in half the time recommended by the car makers simply because your roads are an utter disgrace. There is a large dyke immediately adjacent to said site where any residents with large vehicles or vans etc. Are in real danger of driving into owing to the simple fact the road in single track. The farmers on green belt land access fields with tractors etc., and shift through fields all year round and need space on roads which you actually do not supply in any real sense and leave residents and road users to battle their way from A to B on some of these roads around the villages. The very road in question has numerous accidents owing to the actual narrowness of the road, where it winds down a country lane through fields and goes from one width to another with no real way of knowing if you are on a double track or single track road. The site in question is NOT very accessible to any heavy traffic or vans and yet you still have the idea in your opinions that this is fine and will not affect us the residents or others. This is utter rubbish and untrue and I challenge you on this

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account. I have many other concerns which I wish to raise but at present I require time to be able to get to grips with what you have tried to push under my nose by way of omission of facts with-in your proposal for the community for the years until 2036. I would like to be given the same consolation time as the other sites you propose and I also have questions relating to other issues I have over you forcing traveller sites on communities regardless of what the community says. Which in this case, you have definitely tried to subvert the entire community by rushing these plans down to Westminster to get rubber stamped without any residents knowing what you planned for them and their entire lives and living styles that the entire farming community pays for. As a last point of fact, if you go ahead with said site then myself as a tenant and resident of said community will have no option owing to my disabilities and brain damage to move, so you will immediately put me out of my home which has taken years for me to be able to adjust to since my accident through the help I receive from this entire community, including carers who help me daily which will then also be rendered jobless by my moving out. The knock on effect of what you are planning has also got to be thought out at this stage and don't try to say it has nothing to do with it as this is just utter rubbish, as the entire events are interconnected from the beginning of this plan.

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Response Number	374	Respondent Number:	2814	Comment Author:	Miss C Norton	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>Lack of amenities within walking distance. Nearest amenities are approx 3 miles away. Rural location, so would be reliant on transport to get to amenities. No available Bus Route. No Public Footpaths. No lighting on roads. 60mph speed limit on road.</p> <p>Insufficient spaces at Doctors and Schools.</p> <p>Planning refused for 1 dwelling, so not sufficient for additional dwellings.</p>			Officer Comment:	Officer Recommendation:
Policy Number:	17	Map Number:	72		<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>			No change to the Local Plan is required.	
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	Offer an alternative site which is more suitable to needs and requirements, such as Drain Bank North, Spalding.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

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Response Number	375	Respondent Number:	2815	Comment Author:	Mr & Mrs A Rowinski	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	72			
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 argue that extending the already existing site at Drain Bank in North Spalding would be a far more suitable alternative.

Participate in Examination:

Why wish to participate

We would like to put forward that the proposed traveller site on Whaplode Fen is not fit for purpose, as it does not meet some of the criteria for Policy 17 as laid out in the South Lincolnshire Local Plan 2011-2036, March 2017. We argue that extending the already existing site at Drain Bank in North Spalding would be a far more suitable alternative.

The lack of suitability for the site was brought up previously when planning application was denied for a small housing development on the same site, and quite rightly so in our opinion.

Section 1 of Policy 17 dictates that the site should provide suitable amenity for occupants. Whaplode St Catherine, the adjoining hamlet to this site, has a complete lack of any amenities. There are no shops, no doctors surgeries, no schools, no fire or police service and very limited access to public transport. The only amenities contained herein are a pub, which is neither here nor there in terms of practical use, and a post office running limited hours. This in itself is not safely accessible without a vehicle due to the lack of footpaths and high speed of the roads running from the proposed traveller site to this location. All other amenities are only accessible via Holbeach. As you can see by the below map [map provided by email], this is a minimum of a 3.5 mile journey. None of which contains footpaths and again requires using high speed, unlit roads. This makes it particularly unsafe for any children living on the site and makes accessing these amenities particularly difficult.

Section 3 of Policy 17 requires access to suitable infrastructure for the site. Waste-water treatment is currently non-existent on the site, requiring the installation of a septic tank. The location of the site next to existing homes could negatively affect their living standards if this was to be installed. The site also currently has no access to clean drinking water, again requiring expansions to provide this. There are also no street lights anywhere near to the proposed site, nor are there plans for such. This would make the site unsafe for children moving in, as mentioned before the road contains no footpaths.

Section 5 of Policy 17 requires the site to not negatively effect amenities for existing residents. With the

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

It is expected that waste water will be dealt with by septic tanks. There is currently a three-phase electrical supply to the site, which will be capable of serving four households. Anglian Water Services Ltd. comments that four domestic connections to the potable water supply network can be supplied at this location without the need for reinforcements to be made to the existing network.

The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be

No change to the Local Plan is required.



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expansion of housing developments already in place for Holbeach, the nearest access to amenities for the local area, this site risks this. Schools and doctors surgeries are already struggling to support what is in place and proposals have been put forward to expand these. Not only does adding this proposed site put extra strain on the local public infrastructure but it puts the travellers who would use it at risk of not being able to access these vital systems.

Section 9 of Policy 17 states that the site will not risk highway safety or give problems to access. As you can see from the below picture [picture provided by email], the road the proposed site is attached to is very small. Extra traffic would be problematic for the area, both for the travellers and any other users of that road. Caravans would have difficulty passing other cars, risking damage to vehicles and personal injury. Whaplode St Catherine has already been the site of several road accidents in the last year alone, one resulting in injury to a child and another in a death. This clearly highlights the unsuitability of the roads to extra traffic. Again, the lack of lighting on these roads is of particular concern. It would be difficult for vehicles entering or leaving the site, even on a clear day, to see oncoming traffic. This is especially concerning with the speeds used on that road. This again puts the travellers, particularly the children, at a completely unacceptably high risk should they choose to walk anywhere, which as mentioned, is a necessity to access amenities by anything other than vehicle. We think this clearly demonstrates why this site should be rejected. Suitable alternatives should be used that do not put the traveller community at risk or leave them unable to access necessary infrastructure or amenities.

improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).

The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.

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Response Number	379	Respondent Number:	2818	Comment Author:	Ms T Burchell	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>I would like to raise my concerns regarding the Local Plan and the Proposed Residential Gypsy/Traveller Site at Bleu Raye Farm, Whaplode Fen. In section 5 ix of the national policy it states that the site should not prejudice highway safety or give rise to problems of parking or highway access; Millgate is a narrow road and previous planning applications for one residential property have been refused because of this, I feel it is unsafe to allow 4 pitches on this site, with an average of two cars per family plus visitors and showman's caravans, there will be numerous extra movements on the road. There is also a children's nursery adjacent to the site and these extra movements pose a risk to children being dropped off and collected from the nursery.</p> <p>5 xi of the national policy states to provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport; There are no nearby shops which are safe to walk to the site is rural and some areas have no pavements.</p>	<p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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 site at Drain Bank north Spalding is much more suitable as access can be shared with the existing site there which will be much safer and it is nearer to more amenities in Spalding</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

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Response Number	380	Respondent Number:	2782	Comment Author:	Mr S Rummery	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	72	I believe the proposal to site a gypsy/traveller site at Blue Raye Farm suggests shortfalls in the planning and content of the Local Plan. I have several reasons for believing this. Before coming to those reasons, I must express my concern over the fact that the proposal has entered into the Publication Version of the Local Plan without having appeared earlier in the Draft Version of the plan. The fact that the proposal appears in the Publication Version of the plan may lead readers to presume that it has passed previous scrutiny unopposed. This is not the case. The proposal did not appear in the Draft Version of the plan and was therefore not exposed to any public scrutiny. To insert the proposal into the 'firmed-up' version of the plan circumvents what members of the public could quite reasonably consider to be proper process. I am concerned that, because the Blue Raye proposal exists in the Publication Version of the plan it will be simply 'rubber-stamped' because it is believed to deserve it, by virtue of its having reached the penultimate stage of the process. I sincerely hope this will not be the case.	The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).	No change to the Local Plan is required.
Site Allocation Number:						

<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>	
Legally Compliant	<input type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>
Sound	<input 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 checked="" type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate:

My first comment concerns item v. of the Topic Paper1: 'The site is predominantly surrounded by farmland/grassland and, although there are nearby dwellings, the only existing dwelling that directly adjoins the site is the home of the site owner. It is considered that the site could be developed as a gypsy/traveller site for four households without it having a significant adverse effect on the amenities of existing local residents or adjoining land users'. It is not true that 'the only existing dwelling that directly adjoins the site is the home of the site owner'. In fact, the western edge of the Blue Raye site directly adjoins the eastern edge of my property, [name of property deleted for privacy reasons]. As proof of this, I have attached a copy of the register of title of [name of property deleted for privacy reasons] and a copy of the title plan. [provided by email] Furthermore, it is not true that 'the site could be developed ... without it having a significant adverse effect on the amenities of existing local residents or adjoining landowners'. Longacres, adjoining the Blue Raye site, has been developed over the past forty years as a place of relaxation and study, set in a quiet, unlit rural location. The nature of this location would be distinctly changed by not only the visual presence of a site (possibly lit at night) containing eight caravans, but by the sounds of the normal domestic activity of four

It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". The objector's dwelling (assumed to be that located to the south-west of the allocated site) has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. At the time of a planning application, the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts. Thus, whilst the dwelling's occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach,

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households and associated car movements. In itself, this disturbance would be significant, but item x.i of the Topic Paper1 states: 'it is considered that the site is potentially suitable for mixed residential and business use'. Such use (of potentially four businesses) would inevitably cause increased on-site noise levels including the sounds of vehicles associated with those businesses: vans, trucks, perhaps even lorries. For these reasons I believe the proposal would have a highly significant negative effect on the amenity value of 'Longacres'.

My second point concerns sustainability. The Sustainability Appraisal of the Plan2 highlights five sustainability objectives where the Blue Rave proposal is 'likely to have a negative effect'. Some extracts from the Sustainability Appraisal Appendices3 show these negative effects: From Objective 2 (Health and well-being): 'The majority of facilities that would help to maintain health and promote healthy lifestyles are outside 1km (600m for a community/village hall), the ideal walking distance for such facilities. The nearest health centre, open space, leisure centre/playing pitches and village hall/community centre are all outside the ideal walking distance'. From Objective 3 (Transport): 'The site is just within the ideal 7km distance to a big supermarket, the nearest being the Tesco store in Holbeach approx. 6.97km away - - the car/van is likely to be the preferred mode of transport for this purpose. However, the site is outside the ideal 1km walk of a local shop. It is therefore less likely that occupants would use sustainable modes of transport to meet their everyday shopping needs. There are no public transport routes nearby meaning that public transport access would be difficult for those living on this site'. From Objective 4 (Socially Inclusive Communities): 'This site is not in close proximity to the majority of the area's services and facilities and there are no public transport links nearby. This could have an adverse impact on social inclusion. Furthermore, given the rural location of the site there is a lack of potential employment opportunities in and around the area'. From Objective 5 (Education): 'There are no primary and secondary schools or post 18 education providers within the ideal walking distance. The car/van is therefore likely to be the preferred mode of transport for these journeys. The local education authority has indicated that sufficient capacity is available at primary level in Whaplode to accommodate the developments proposed in the Local Plan. However, at secondary level no capacity is available at the nearest school in Holbeach and its post-16 facilities are also at capacity.

approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

Potential loss of property value is not a material planning consideration.

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Additional spaces will therefore be required to accommodate all of the proposed developments.' From Objective 13 (Economy and Employment): 'There is a lack of potential employment opportunities in and around the area which is likely to limit the extent to which more sustainable modes of transport can be used to travel to work'. Paradoxically identified as 'likely to have a positive effect', Objective 1 (Housing) concludes: 'However, the site is detached from development limits and so its development would, in general, be contrary to the principles of the settlement hierarchy'. I believe the above conclusions further demonstrate the unsuitability of the site.

My third comment concerns previously rejected planning applications at Blue Raye Farm. For example one application for siting a caravan<sup>4</sup> was rejected because the site was 'outside the confines of a settlement in an area of open countryside', also one<sup>5</sup> in 2011, rejected because 'The main issue is the effect of the proposed development on the character and appearance of the countryside' and the most recent (October 2016) for converting stables to residential use<sup>6</sup> rejected on appeal because: ' The proposed development is considered to be inherently unsustainable given its location in the open countryside outside of the development boundary of any settlement.... The site is not considered to be a suitable site for housing with particular regards to the principles of sustainable development'. It would be reasonable to assume that as the planning authority has repeatedly considered the site to be inappropriate for a modest dwelling for single occupation, it must consider the site to be even more inappropriate for multiple occupation by four families in eight caravans.

My final point concerns possible negative impact on the local economy. We have chosen to live here because we believe that this area is worth living in; we like it here. We have invested family money in developing our home, as have many South Holland residents. We used a local architect and builders, who used materials from local suppliers. It is a sad but true fact that the presence of a gypsy/traveller site negatively affects property prices. An inappropriate planning decision could convey the message that this area is not worth investing in; that home owners would be better advised to spend their money elsewhere if they wished to retain the full value of their children's inheritance. Loss of faith in the area would have negative effects on the local economy; confidence in the future of the area will stimulate it. It is

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for all the above reasons that I maintain that Blue Raye Farm is not a suitable location for the gypsy/traveller site.

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Response Number	381	Respondent Number:	2800	Comment Author:	Mrs L Exley	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:	
Policy Number:	17	Map Number:	72	<p>Late entry of the site, not being in any of the 2016 consultations has meant that a large sector of this rural community have been unable to comment as they have had no communication and everything is on line, the area has poor internet and a demographic population that does not use the internet and emails on a daily or weekly basis if at all.</p> <p>The plan will affect and damage all of the positive points that makes this part of the countryside so rich, the area is not suitable for a number of dwellings that will have a negative impact on the environment. Wooded area has a bat population less than 10 form the planned site development which would be damaged.</p> <p>Insufficient space at schools. Insufficient space at doctors.</p> <p>No pathways and no lighting on a 60ph narrow road with pot holes.</p>	<p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape. No nearby areas of land are identified as being of importance to nature conservation. The site is located just over 1 km from a Scheduled Ancient Monument, but it is not considered that its development would adversely this heritage asset.</p> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p>				<p>No change to the Local Plan is required.</p>	
Site Allocation Number:										
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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>The planned site needs to provide potential for schools doctors and shops.</p> <p>The planned site would be better suited in an established community to help with support and integration such as Drain Bank North, Spalding.</p> <p>Planned site should have more competent and complete investigations due to the timing of this it appears rushed with a number of assumptions being made that are inaccurate.</p>									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities are available in Holbeach, approximately 5 kms from the site. It is not considered that:

- existing residential Gypsy and Traveller sites in South Holland; nor
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' offer materially superior access to facilities.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

<b>Response Number:</b>	382	<b>Respondent Number:</b>	2819	<b>Comment Author:</b>	Mr D McWilliam	<b>Client:</b>		<b>Web Link:</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content:</b>			<b>Officer Comment:</b>		
<b>Policy Number:</b>	17	<b>Map Number:</b>	72	<b>Comment Content:</b>	I have reviewed the South East Lincolnshire Local Plan and would like to comment on the proposed traveller site off Mill Gate on Whaplode Fen. I have some concerns as follows: Access to the site is not suitable for caravans as the local roads are quite narrow.		<b>Officer Comment:</b>	The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.	
<b>Site Allocation Number:</b>				<b>Comment Content:</b>	No amenities or facilities, e.g. Shops, etc. Within the immediate area. No schools within the immediate area.		<b>Officer Comment:</b>	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:	
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" type="checkbox"/>						- existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.	
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									
								<b>Officer Recommendation:</b>	
								No change to the Local Plan is required.	



**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	388	Respondent Number:	1043	Comment Author:	CLlr Malcolm Chandler	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	<p>When assessing the evidential need, the selection of sites has been restricted to the four locations only. The assessment does not look at the options available across the Plan area. It must be asked whether the selection process has been broad enough across the whole District in selecting locations for the identified needs.</p> <p>There is no evidence that the site is acceptable to the travelling community.</p> <p>This site was determined as being the least likely to flood or not suspected of being contaminated land. The site is not the best of the four considered.</p> <p>It conflicts with the South Holland Local Plan written statement adopted July 2006. HS19 Sites for Gypsies and Travellers. This sets out the criteria to approve which works well and should be applied in this case.</p> <p>This site has already been determined as unsuitable for residential occupation by the Planning Inspector in the Appeal Decision Ref /A2525/w/16/3162106 dated 28 March 2017 relating to a residential use planning application no. H23-0880-16 in which the Inspector considers 4. As located in the open countryside away from a settlement with services and facilities, I accept that the development would be isolated and would be likely to rely on the private car. Consequently, it would not usually amount to a suitable location for residential use, and would not accord with saved Policies SG1, SG2 and H7 of the South Holland Local Plan 2006 (LP) which seek to direct new development towards settlements and restrict development in the open countryside in order to protect its rural character. The development would also conflict with paragraph 17 of the National Planning Policy Framework (the Framework) which seeks to actively manage patterns of growth to make the fullest possible use of public transport walking and cycling. The Inspector goes on to state, 22 Moreover given conflict with those policies of the Framework identified above the proposal cannot be considered sustainable development in accordance with paragraph 14 of the Framework</p> <p>The Topic Paper-Provision of gypsies , travellers and travelling showpeople in South East Lincolnshire Local Plan 2011-2036 Publication version (March 2017) states clearly that the selection of suitable sites for Gypsies</p>			Officer Comment:	<p>The site selection process examined only areas of land that had been specifically promoted for development as Gypsy/Traveller or Travelling Showpersons' sites. The assessment of other sites was considered to be inappropriate because their availability for development could not be relied upon.</p> <p>The objector is correct that the site has not been promoted by a member of the Gypsy or Traveller community. However, it is not accepted that this renders the site unsuitable for allocation.</p> <p>The assessment set out in the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) demonstrates that the allocated site is the only deliverable/developable option of the four considered.</p> <p>It is not agreed that allocated site conflicts with the provisions of policy HS19 of the South Holland Local Plan nor those of policy 17 of the South East Lincolnshire Local Plan.</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m</p>	
Policy Number:	17	Map Number:	72	Officer Recommendation:	No change to the Local Plan is required.					
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" 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:	<p>The selection of a suitable site from the restricted four in the plan would indicate that the most suitable being that of the expansion of Drain Bank North Spalding. This land which is optioned by the Council fits immediately next to a committed built out and occupied site and is deliverable. Drain Bank North is already identified as being a suitable location for the purpose and overcome the concerns raised by the Environment Agency by appropriate mitigation.</p>									
Proposed changes to make compliant or sound:	<p><input checked="" type="checkbox"/></p>									
Participate in Examination:	<p><input checked="" type="checkbox"/></p>									
Why wish to participate	<p>Given the opportunity, I would speak at the Public Examination to promote my affirmed view that the correct choice of site for the proposed purpose is selected within the recommendations and proposals in the South East Lincolnshire Local Plan.</p>									

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and Travellers, should be aligned with that of other residential considerations. 5 Identifying sites 5.1 As with sites for bricks and mortar homes, any assessment of potential gypsy, traveller and travelling showpeople's sites will need to consider availability, achievability and suitability. Suitability was assessed against the criteria of policy 17 of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016), which identified that gypsy/traveller/ travelling showperson's sites for permanent residential use should: i. Provide occupants with an acceptable standard of amenity; ii. Not be located adjacent to uses likely to endanger the health of occupants; iii. Be adequately provided with appropriate infrastructure such as electricity, drinking-water, waste-water treatment and recycling/waste management; iv. Respect the scale of the nearest settled community; v. Not have a significant adverse effect on the amenities of existing local residents or adjoining land users; vi. Not place undue pressure on local infrastructure; vii. Be successfully assimilated into both their immediate environs and the wider landscape; viii. Not affect heritage assets or areas of importance to nature conservation; ix. Not prejudice highway safety or give rise to problems of parking or highway access; x. Provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport; xi. Be suitable (or capable of being made suitable) for mixed residential and business use; and xii. Not be located within Flood Zone 3a or 3b, or be located within Flood Zone 2 only if the Sequential and Exception Tests have been passed Further, consideration must be given to the criteria set out in the SELLP Policy 17 itself where it is clearly stated in 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople Planning permission will be granted for: A. Sites for permanent residential use if they: i. Provide occupants with access to education, health care and recreational facilities, shops and employment within reasonable travelling distances, preferably by walking, cycling or public transport: The prompted site directly conflicts with this policy It would appear then, that the considerations for this site have been made without full consideration for the full criteria.

There is local concern that the site is contrary to the assessment statement being in close proximity to three other residential properties sited with more suitable positions and bordered by arable farmland.

Whaplode being the closest settlement is 3 kilometres

from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

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away, is a small village with one primary school two petrol /food shops and restricted medical services. The site is situated on a narrow country road subject to fast moving traffic, there are no pedestrian footpaths or street lighting making the road unsuitable for walking or cycling. There is no public transport servicing the location with the more available necessary services and shops some 5 kilometres away in Holbeach. This site is therefore unsustainable based on the indentified criteria for residential development. There is a need to work to the existing policy which when applied to this matter would preclude this site from further consideration to find it as suitable for the proposed purpose and identifies this as not being the best option of those noted within the Plan

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Response Number	394	Respondent Number:	2822	Comment Author:	Alice Piper	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:		<p>Not legally compliant: Although we reside in Millgate, we were unaware of the proposal relating to the provision for gypsies, travellers and travelling showpeople at Bleu Raye farm until notified by another local resident. There was no public notification of the proposals.</p> <p>Unsoun: To be justified a Plan must be the most appropriate based on considering reasonable alternatives. The plan states that the provision for travellers should offer access to education, health care and recreational facilities as well as shops and employment, ideally by walking or using public transport. The only leisure facilities nearby are a playground in Whaplode. There is no public transport near the proposed site and just a small shop (at the petrol station) in Whaplode.</p> <p>It is worth noting at this point that a recent planning application relating to the same location (Bleu Rays Farm) was Refused in October 2016 and the Appeal declined in March 2017 (H23-0880-16) on the grounds that residents would have high dependence on the motor car as there is no public transport. The Refusal went in to mention the lack of nearby facilities and harm caused by carbon emissions from the additional motor car usage. One would assume that a planning application for a travellers site in the same location would have to be refused on the same grounds.</p> <p>In terms of access to education. There is a primary school in Whaplode (not served by a foot path) which I understand to be fully subscribed. The nearest medical facility is the doctors' surgery at Moulton, which is operating at full capacity and, again, there is no footpath or cycle path.</p> <p>Finally, the wording of the plan mentions no neighbouring dwellings. I believe there are two in addition to the farm. It would appear that the plan may have been prepared based on out of date information without a full site visit.</p> <p>The development of the site will require the construction of a fairly substantial access road in order to allow access for cars and caravans as well as refuse collection lorries. Millgate is quite narrow and this could present difficulties.</p>	<p>The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the</p>	No change to the Local Plan is required.			
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Soun <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" 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:	<p>The plan considers and rejects land at drain bank north as an alternative. The land under consideration is adjacent to an existing travellers site for which planning permission has already been granted. The reason given for rejecting this site is the (relatively low) flood risk. Given that there already is an established site with the relevant amenities, it would seem logical and sensible to pursue this option further.</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

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Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).

It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior

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access to facilities.

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Response Number	395	Respondent Number:	2823	Comment Author:	Jeremy Piper	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	72	The proposed traveller site at Bleu Raye Farm, Whaplode Fen is unsuitable because. 1) The proposal states that only one dwelling directly adjoins the site, this is factually untrue as there is another dwelling that adjoins the western boundary of the proposed site	It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.	No change to the Local Plan is required.
Site Allocation Number:						

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

Compliant, Sound, Duty to Cooperate explanation:	
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Proposed changes to make compliant or sound:	There is a purpose built travellers site in our area, located at North Bank in Spalding which has vacancies.
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Participate in Examination:	<input type="checkbox"/>
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Why wish to participate	
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2) Millgate is a very narrow road, effectively single carriage way that is also untreated in the winter. This would not be suitable for large number of vehicles to safely enter and exit the proposed site.

3) The site is greenfield and thus not suitable for mixed residential and business use

4) Numerous planning applications have been refused in the area due to the impact on traffic and local amenities.

5) Previous planning applications at the proposed site have been rejected on the grounds of being outside the development boundary of any settlement, not on a regular public transport use and hence a high dependence on motor vehicles contrary to planning principles of paragraph 17 of the National Planning Policy Framework. The proposed four dwellings would have a greater dependency on motor vehicles than the single rejected dwelling, so how can four additional dwellings be deemed an appropriate development for this site.

The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.

The site is intended to be developed primarily for residential use. Any business use would be ancillary only.

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.



**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	445	Respondent Number:	2826	Comment Author:	Mrs S Rout	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>The site is not suitable for development. Planning Applications have been refused on the same piece of land.</p> <p>They have been refused due to reasons such as lack of amenities including shops, doctors, schools, etc, the rural location - the planning inspectorate said the site didn't have any public transport routes</p> <p>No pathways, no street lights and the road was deemed unsafe due to this.</p> <p>The site is completely rural and a single dwelling was refused as it would affect the character of the countryside, so therefore multiple dwellings would also affect the local countryside.</p> <p>The local plan states there are no immediate neighbours, This is incorrect as there are 2 properties that adjoin the site and there are adjoining land users also.</p> <p>The local plan states the site has its own boundary hedging which is incorrect as at least one boundary is owned by one of the adjoining properties.</p>	<p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.</p> <p>It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that</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 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>Drain Bank North - Spalding already has a traveller site close to amenities such as shops, schools, doctors and a minor injury unit. There is public transport available. There are main roads with adequate pathways, lighting and routes to amenities.</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

The ownership of the trees or hedges which currently screen the site is not considered to be material.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	448	Respondent Number:	2827	Comment Author:	Mr W Beeken	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>A traveller site based at Blue Raye farm would not be sufficient for the family. There is no play area, no shops for local groceries.</p> <p>This area is quiet environment and travellers are not sufficient on this site type of land.</p> <p>Furthermore a dwelling was refused planning permission so how can this planning go ahead.</p>			Officer Comment:	<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The site is screened from view from the south, west and east by trees and hedging. From the north, only partial and distant views are available. It is considered that the site is capable of being successfully assimilated into its immediate environs and the wider landscape.</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>
Policy Number:	17	Map Number:	72	<p>Do you consider that this part of the Local Plan is</p> <p><b>Do you consider that the Local Plan is unsound because it is not:</b></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> <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>			<p>Officer Recommendation:</p> <p>No change to the Local Plan is required.</p>		
Site Allocation Number:		Compliant, Sound, Duty to Cooperate explanation:							
Proposed changes to make compliant or sound:		Offer the travellers an alternative site such as Drain Bank Spalding.							
Participate in Examination:		<input type="checkbox"/>							
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	455	Respondent Number:		Comment Author:	Miss A Gale	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	Road is unsafe at 60mph. No pathways and no lighting. Planning refused already for 1 dwelling so not sufficient for additional dwellings. Insufficient schools and spaces for traveller children. Insufficient Dr spaces. Lack of shops will be walking approx 2 hours or 3 miles away.	The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.  It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.  The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).  Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.  It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood		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 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 checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	Offer the traveller family an alternative site. Drain Bank North Spalding. Bretton Peterborough.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

The South East Lincolnshire Local Plan is unable to make land allocations at Bretton, Peterborough.

<b>Response Number</b>	468	<b>Respondent Number:</b>		<b>Comment Author:</b>	Mrs H Henderson	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>		<b>Officer Comment:</b>		<b>Officer Recommendation:</b>	
<b>Policy Number:</b>	17	<b>Map Number:</b>	72	<p>I do not think there is enough amenities around ie shops, doctors, schools. The proposed allocation doesn't represent sustainable development as required by the NPPF section 17.</p> <p>Planning permission has already been refused for dwellings APP/A2525/W/16/3162106. The Planning Inspectorate said it was unsuitable for 1 home so how can it be suitable for 4 homes.</p>	<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>	<p>No change to the Local Plan is required.</p>			
<b>Site Allocation Number:</b>									
<p><b>Do you consider that this part of the Local Plan is</b></p> <p><b>Legally Compliant</b> <input type="checkbox"/></p> <p><b>Sound</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p><b>Positively Prepared</b> <input checked="" type="checkbox"/></p> <p><b>Justified</b> <input checked="" type="checkbox"/></p> <p><b>Effective</b> <input type="checkbox"/></p> <p><b>Consistent with national policy</b> <input checked="" type="checkbox"/></p>							
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>	<p>They could go on the site in Drain Bank Spalding, which is near to shops, schools and doctors, and is already on an established community there.</p>								
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	472	Respondent Number:		Comment Author:	Mr K Haynes	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	72	Wasn't included in the local plan. Blue Raye Farm was an extremely late addition to the local plan.	The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).	No change to the Local Plan is required.
Site Allocation Number:				There are non conformity's within the plan, including incorrect description of the site put forward, including the description of the area surrounding the site.	It is accepted that the Topic Paper – Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017) is incorrect in its assertion that "the only existing dwelling that directly adjoins the site is the home of the site owner". A dwelling to the south-west of the allocated site has a curtilage that extends approximately 340m northwards from Hurdletree Bank, and adjoins the allocated site. From public vantage points, the majority of this curtilage (including those parts which adjoin the allocated site) have the appearance of a woodland, rather than domestic curtilage. Although it is accepted that the allocated site does in fact adjoin the curtilage of a dwelling other than that of the site owner, it is still not considered that the site's development will have a significant adverse effect on the amenities of that dwelling's occupants. The allocated site is located more than 60m from the dwelling, and approximately 25m from those parts of the curtilage which appear to be used as a 'traditional garden'. The dense planting within the curtilage will screen the dwelling and 'garden' area from views of the allocated site, and will also mitigate noise or light issues. The allocated site does not adjoin the curtilage to the dwelling known as Home Farm (to the east of the allocated site), although the proposed vehicular access will come within approximately 15m and the main body of the site within approximately 50m. It is considered that existing boundary planting between Home Farm and Bleu Raye Farm will screen Home Farm and its garden from views of the allocated site and will also mitigate any noise or other impacts. At the time of a planning application the layout and design of a scheme for the development of the allocated site would be carefully scrutinised to minimise impacts	

<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>	
Legally Compliant	<input 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 type="checkbox"/>
		Consistent with national policy	<input checked="" type="checkbox"/>

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

The plan should have been resubmitted including this site after investigations have been completed. There are existing sites in Holbeach and Spalding that have room for expansion one of these should be considered instead of applying for an additional site to be created in a countryside location.

Participate in Examination:

Why wish to participate

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

and, whilst the nearby dwellings' occupants will no doubt be aware that the use of adjoining land had changed, this would not amount to significant adverse effects.

It is assumed that the existing sites referred to by the objector are Rose View Drive, Holbeach and Drain Bank North, Spalding. It is not accepted that these sites are more suitable than the allocated site, because:

- there is no evidence that landowners would make land available for such development;
- these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and
- it is not agreed that these sites would offer materially superior access to facilities.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	476	Respondent Number:		Comment Author:	Mrs P Haynes	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				
Policy Number:	17	Map Number:	72	The local plan offers Bleu Raye Farm as a proposed traveller site. The proposed site is situated in the middle of the countryside. There are no amenities within walking distance of the site.		Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:			
Site Allocation Number:				The doctors in Moulton is fully subscribed. There are no NHS dentists available within at least a 10 mile radius. The school in Whaplode and the school in Moulton are full with waiting lists.		- existing residential Gypsy and Traveller sites in South Holland; and			
<p><i>Do you consider that this part of the Local Plan is</i></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>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>		The road the site is situated on has no streetlights and no footways.		- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.			
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	I expected the local plan to look into the sites put forward before they were submitted. Drain Bank North - Spalding has room for expansion.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
						<p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>			
						Officer Recommendation:			
						No change to the Local Plan is required.			



**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	481	Respondent Number:		Comment Author:	Mr A Brooks	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	There is a local programme to reintroduce English Partridge to the fens for development, it would damage this.	Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation.  Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.	No change to the Local Plan is required.			
Site Allocation Number:									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
Legally Compliant	<input 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 type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Planned site should provide potential for transport link of affordable transport near to town.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	482	Respondent Number:		Comment Author:	Mrs R Brooks	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Late entry of the site, it was not in any of the 2016 consultations which in turn has meant a large amount of local people have not been able to comment and have their say.			Officer Comment:	The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).  It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities	
Policy Number:	17	Map Number:	72	Officer Recommendation:	No change to the Local Plan is required.					
Site Allocation Number:				<p><i>Do you consider that this part of the Local Plan is</i></p> <p>Legally Compliant <input 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 checked="" 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:	Drain Bank Spalding - planned site needs to provide potential choice of schools, doctors and shops.									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

<b>Response Number</b>	484	<b>Respondent Number:</b>		<b>Comment Author:</b>	Mrs P Freeman	<b>Client</b>		<b>Web Link</b>		
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>			
<b>Policy Number:</b>	17	<b>Map Number:</b>	72	I would like to object because I feel the local schools could not cope, they are full already.	The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. [The potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach.]		No change to the Local Plan is required.			
<b>Site Allocation Number:</b>				There is no doctors in Whaplode, the nearest is 3 miles away. This being rural so there is no bus service.	The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.					
<b>Do you consider that this part of the Local Plan is</b> Legally Compliant <input type="checkbox"/> Soun <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		<b>Do you consider that the Local Plan is unsound because it is not:</b> Positively Prepared <input checked="" type="checkbox"/> Justified <input checked="" type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input checked="" type="checkbox"/>		The site is on a single carriageway with very deep dyke opposite, there are no footpaths and no street lighting		Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.				
<b>Compliant, Sound, Duty to Cooperate explanation:</b>										
<b>Proposed changes to make compliant or sound:</b>										
<b>Participate in Examination:</b>	<input type="checkbox"/>									
<b>Why wish to participate</b>										

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	492	Respondent Number:	2805	Comment Author:	Mr P Freeman	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	17	Map Number:	72	<p>I would like to object because: The local amenities are not sufficient, ie schools are at bursting point, the road is very narrow, there is no pavement, no street lights, several miles away from village or town.</p> <p>Also, I have diversified my business and invested in a property (Southernwood, Hurdletree Bank) only a few hundred meters away from the proposed site. The property is rented out. The current tenant tells me he will not want to live there anymore if travelers move nearby. Any future tenants will be hard to find. Rental income would be greatly reduced, as would property value.</p>	<p>Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>Potential loss of property value is not a material planning consideration.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

<b>Response Number</b>	493	<b>Respondent Number:</b>	2806	<b>Comment Author:</b>	Mrs A Johnson	<b>Client</b>		<b>Web Link</b>		
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>			
<b>Policy Number:</b>	17	<b>Map Number:</b>	72	<p>There is a distinct lack of amenities locally - the nearest village being 3 miles away. There is not a local bus stop. There is no bus route There is no street lighting The are no footpaths.</p> <p>The local doctors are full to capacity, as are the local schools.</p> <p>The area surrounding the proposed site is made up of wooded areas which I believe has a bat population together with turtle doves and other wildlife. Development here would seriously damage their population.</p>		<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>		No change to the Local Plan is required.		
<p><b>Do you consider that this part of the Local Plan is</b></p> <p><b>Legally Compliant</b> <input type="checkbox"/></p> <p><b>Sound</b> <input type="checkbox"/></p> <p><b>Prepared in accordance with Duty to Cooperate</b> <input checked="" type="checkbox"/></p>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p><b>Positively Prepared</b> <input checked="" type="checkbox"/></p> <p><b>Justified</b> <input checked="" type="checkbox"/></p> <p><b>Effective</b> <input type="checkbox"/></p> <p><b>Consistent with national policy</b> <input checked="" type="checkbox"/></p>								
<b>Compliant, Sound, Duty to Cooperate explanation:</b>										
<b>Proposed changes to make compliant or sound:</b>	I believe a planned traveler site needs to be near a public transport link and have a choice of shops, schools and doctors nearby. An alternative site already up and running is situated at Drain Bank North in Spalding which provides easy access into town together with all the necessary amenities.									
<b>Participate in Examination:</b>	<input type="checkbox"/>									
<b>Why wish to participate</b>										

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	494	Respondent Number:	2807	Comment Author:	Mr P Henderson	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	The plan states any travelers sites should be within walking distance to local amenities and schools, however this is not the case here.			Officer Comment:	Officer Recommendation:	
Policy Number:	17	Map Number:	72	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that: - existing residential Gypsy and Traveller sites in South Holland; and - the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.			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 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 checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	I believe there is already an established site at Drain Bank so could they not be housed here?									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	495	Respondent Number:	2808	Comment Author:	Mr N White	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:	17	Map Number:	72	Planning already refused in the past for reasons: Single track road No footpath or lighting	The Highway Authority does not consider that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.		No change to the Local Plan is required.			
Site Allocation Number:				Lack of amenities ie schools, shop, etc within walking distance Use of car as no public transport	Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:					
<p><b>Do you consider that this part of the Local Plan is</b></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>				<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>				<p>Other existing gypsy/travellers site can be expanded in the area.</p>		
Compliant, Sound, Duty to Cooperate explanation:										
Proposed changes to make compliant or sound:	Use of car as no public transport									
Participate in Examination:	<input type="checkbox"/>									
Why wish to participate										
			<p>The objector does not identify the 'existing sites' to which he refers, but it is assumed that that he may mean Rose View Drive, Holbeach or Drain Bank North, Spalding. It is not agreed that these locations are more suitable than the allocated site, because:</p> <ul style="list-style-type: none"> <li>- there is no evidence that landowners would make land available for such development;</li> <li>- these sites are located within Flood Zone 3 and do not therefore comply with the requirements of Policy 17 of the Local Plan; and</li> <li>- it is not agreed that these sites would offer materially superior access to facilities.</li> </ul>							

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	496	Respondent Number:	2809	Comment Author:	Mrs A Jefcoate	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:			Officer Recommendation:	
Policy Number:	17	Map Number:	72	<p>There are a lack of amenities within walking distance (nearest amenities are approx 3 miles away). A rural location residents would have to rely on transport to get to amenities but there is no bus route, no pathways and no lighting.</p> <p>Local schools and GP surgeries are full to capacity.</p> <p>A previous planning application for a single dwelling was refused so cannot see how permission for multiple dwellings can be justified.</p>	<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.</p>	<p>No change to the Local Plan is required.</p>			
Site Allocation Number:									
<p><b>Do you consider that this part of the Local Plan is</b></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>		<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	I suggest an alternative site such as Drain Bank North Spalding.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									



**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	505	Respondent Number:	2828	Comment Author:	Mr J Hitcham	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:
Policy Number:	17	Map Number:	72	<p>Brandon Lewis MP stated that Traveler sites shouldn't be sited in unsuitable locations that were greenfield sites away from facilities when other more appropriate sites were available. This site doesn't offer relevant amenities that are safe to et to and are within reasonable walking distance. Most are over 3 miles away. There are no pathways so persons residing will be walking along a dangerous narrow (for a 60mph) road that isn't lit. There are no bus stops within sensible safe walking distance.</p> <p>Public vehicles often are moving at the speed limit or faster and these can often be large agricultural tractors with implements attached on the back that exceed the normal width of one carriage way. At certain times of the year (grain harvest, sugar beet lifting and potato harvesting times) agricultural 15t and commercial 38t lorries are making many daily movements along this road and take up a substantial amount of this narrow main road.</p> <p>Local schools are generally full throughout year groups and cannot exceed their pan and nearest bus stop for pickup/dropoff is not within safe walking distance ( over 3 Km without paths or lighting) Local Doctors (Moulton) is full and again cannot be accessed without own transport.</p> <p>What consideration has been given to stop the proposed site from spreading and becoming unruly site like Dale Farm in Essex. From what I have seen it looks very likely this could happen.</p> <p>Residential planning has already been refused for one dwelling at this site so really an increased number of dwellings is surely not sustainable. Again Brandon Lewis MP said that travelers should be afforded the same levels of planning law as the public.</p>		<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>A planning application for the development of a greater area of land than that allocated would be judged against the provisions of the Local Plan and national guidance and, only if the proposal was well-evidenced and complied with local and national policy, would permission be granted. Enforcement action could be taken against any unauthorised development.</p> <p>It is not agreed that refusals of planning permission for</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 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 checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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>I would try to use a local site already established to try and get best value for the tax payer. Drain Bank North Spalding could be such a location and would comply with Duty to Cooperate.</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development. The site is located within Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan. It is not agreed that this site would offer materially superior access to facilities.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	514	Respondent Number:	2829	Comment Author:	Mrs A Hitcham	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				
Policy Number:	17	Map Number:	72	<p>I have a number of concerns as to the suitability of this site and why it does not comply with the Duty to Cooperate: 1 The site is in a rural location with no bus route, no pavement or pathway and no lighting on the road which the site is proposed to be sited. 2 There are no shops, garages, or local amenities in the vicinity, or within walking distance. The closest facilities are either Moulton Chapel or whaplode - both of which are at least 2 miles away. As there is not public transport to either of these villages from the site, combining points 1 &amp; 2, I would question its viability in terms of convenience and safe access to amenities.</p> <p>3 The site is on a road which has a 60 mph speed limit. For access to and from the site I would further question safety.</p> <p>4 Local Doctors and Schools are already at capacity (Moulton and Whaplode). I would therefore suggest that also on these grounds, the proposal fails to comply with the duty to cooperate.</p> <p>5 I understand that an application for planning for 1 dwelling was refused recently. This being the case, how can it now be suitable for multiple dwellings?</p>	<p>Many facilities (e.g. primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:</p> <ul style="list-style-type: none"> <li>- existing residential Gypsy and Traveller sites in South Holland; and</li> <li>- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.</li> </ul> <p>The Highway Authority does not agree that the development of the site as a Proposed Residential Gypsy/Traveller Site will have adverse impacts upon highway safety.</p> <p>The County Education Department comments that there is sufficient primary school capacity available for developments proposed locally. Improvements will, however, be required to local secondary and sixth-form provision. The CCGs comment that there is some capacity at the local GP surgery(ies) to accommodate additional patients, however county-wide there is an increasing shortage of GPs, nurses and other healthcare staff which could affect future capacity should demand increase. The capacity of these facilities will need to be improved to accommodate the scale of development proposed locally (but the potential impact of this particular proposal on local education and health facilities pales into insignificance when considered in the context of the Plan's wider housing proposals, e.g the Local Plan allocates land to accommodate 27 dwellings in Moulton, 99 dwellings in Whaplode, and 1,054 dwellings in Holbeach).</p> <p>It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.</p> <p>It is not agreed that an alternative allocation should be made at Drain Bank North, Spalding. There is no evidence that a landowner would make land available for such development, and the site is located within</p>				
Site Allocation Number:		<p><b>Do you consider that this part of the Local Plan is</b></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>							<p><b>Do you consider that the Local Plan is unsound because it is not:</b></p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input checked="" type="checkbox"/></p> <p>Effective <input 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:	My suggestion would be to look at an alternative site in the locality. I believe that Drain Bank North, Spalding complies with the Duty to Cooperate.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									
No change to the Local Plan is required.									

**Post Title:** 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople

Flood Zone 3 and does not therefore comply with the requirements of Policy 17 of the Local Plan.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

Response Number	548	Respondent Number:	2826	Comment Author:	Mr C Rout	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	17	Map Number:	72	The very late entry of the plan, without being in previous consultations has meant that many of the residents of the area will not have had the opportunity to be consulted in this matter. This meant at the very start of the consultation, no one was aware and the available information from the Parish Council was limited because they had little time to prepare Please see attached opening correspondence emails There have been no presentations at the village hall or for those who do not have internet access, there has not been a pro-active approach from the local plan to inform people of the changes that are being looked at in their community. It is a rural area with very limited internet access and speed. We have a fantastic wealth of farmers, land workers, engineers and those lucky enough to be retired, who do not have the internet and do not use it. Those who attended the Parish Council meeting on the 26th April 2017 were very appreciative of Christopher Holliday attending to offer his knowledge of the plan. One thing that became apparent was that most of the 106 people who attended did not have the ability to use the internet, and those that did had issues with the correct way to make a comment on the consultation. With earlier proposals being submitted in the plan in January 2016 and again July 2016, Bleu Raye was never included in the plans. This has not given fair opportunity to people to be consulted because of the timescales involved, it I believe is the minimal amount of time allowed and will just meet legal compliance. However I do not believe it has been completed as best practice would be suggested and in the timescales that would be best for a community such as ours to have access to participate as they may wish.	The evidence that underpins the allocation (the Boston and South Holland Gypsy and Traveller Accommodation Assessment) was not available until November 2016. Thus, the proposal could not have been included in either the Draft for Public Consultation (January 2016) or the Public Consultation on Preferred Sites for Development (July 2016). However, it is considered that the publicity given to the Publication Version (March 2017) and the opportunities for interested parties to give their views comply with statutory requirements and the provisions of the South East Lincolnshire Statement of Community Involvement (April 2012).	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:

I believe it is essential that the law is followed and upheld and we do not compromise because it meets a requirement. The planning policy outlines that the to ensure fair and equal treatment for travellers', to be equal the site cannot be considered. The requirement to source a brownfield or already established site outside a town should be considered and fully investigated rather than looking to use a greenfield site, change it use, make it business and residential, when South Holland District Council, an inspector for the Secretary of state and a local resident who is Member of the Houses of Parliament have all stated that the site is unsuitable, does not 1 meet government guidelines, should be upheld on this consultation to once again seek planning on the site A site that meets the needs of the dwellings, meeting the needs of amenities, travel and sustainability, not compromising on the safety of the highways affecting the rural landscape of our environment must be met.

Participate in Examination:

Why wish to participate

Sustainability of the site development, because of its location, are not met. The site is in a rural location, the road is not an A road or even a B road, it is just a rural road. There are no footpaths, there is no street lighting, the road is not gritted during winter months and is on a national speed limit to any nearby facilities It is narrow in places, most narrow at the proposed entrance to site. It has been subject to numerous accidents, especially at the junction with Hurdletree bank, which is where Millgate joins, and around 128m from that point on an unsighted point on the road is the suggested entrance to the site I have raised my concerns with Lincolnshire Highways, Jon Sharpe, unfortunately as you can see from the attached emails, his initial overview would

The Highway Authority comments that the impediments to visibility at the access are of a non-permanent nature i.e. they are trees, bushes and shrubs that are overgrowing the highway verge on the west side of Mill Gate. The respective land owners could, and in fact should, be required to trim them back so that they do not overhang the verges. The visibility at the access to Bleu Raye Farm would then be acceptable.

It is not agreed that refusals of planning permission for other uses in other nearby locations mean that this site is unsuitable for allocation as a Proposed Residential Gypsy/Traveller Site.

The site selection process examined only areas of land that had been specifically promoted for development as Gypsy/Traveller or Travelling Showpersons' sites. The assessment of other sites was considered to be inappropriate because their availability for development could not be relied upon.

Many facilities (e.g. Primary school, retail, employment) are available in Whaplode, just over 3 kms from the site. A fuller range of facilities is available in Holbeach, approximately 5 kms from the site. It is accepted that the majority of journeys between the site and these facilities are likely to be made by the private car but it is considered that:

- existing residential Gypsy and Traveller sites in South Holland; and
- the sites considered as other options in the 'Topic Paper Provisions for Gypsies, Travellers and Travelling Showpeople in the South East Lincolnshire Local Plan 2011-2036: Publication Version (March 2017)' do not offer materially superior access to facilities.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

suggest that the carriageway is capable of accepting the additional traffic movements of both business and residential traffic to the four new dwellings and the road is suitable. With the timescales available it would appear that no exact detail has been discussed in detail as it is not at the planning stage, I would have thought it essential to look at these points in detail. After being unable to have a site meeting or any correspondence with Lincolnshire highways over the matter as per Jon's email 13 April 2017, as a consultee he is only a member of the public in this matter, I was surprised and as such had no choice but to employ a specialist to review the road. Please see attached emails Jon Sharp. Please see attached report from Sanderson consulting engineers, confirming with reference to guidelines where they believe the site fails to meet guidelines. Please see attached report Sanderson - R I Greenwood Eng FIHE

The proposed development of the site for planning policy outlines to ensure fair and equal treatment for travellers. But the site has been reviewed by the planning department in South Holland numerous times since 2010 and has been revisited following appeals and committee decisions until in March 2017 when the current landowner was given notice, and the appeal was dismissed, that they were unable to continue living on the site in a single dwelling with retrospective planning. On 28 March 2017 Claire Searson MSc PGDip BSc (Hons) MRTPI IHBC An inspector appointed by the secretary of state for communities and local government. Following a site visit on 21 February 2017 Decision 1. The appeal is dismissed. Please see attached report The Planning Inspectorate Appeal Decision Claire Searson MSc PGDip BSO (Hons) MRTPI IHBC An inspector appointed by the secretary of state for communities and local government. In essence to ensure fair and equal treatment for travellers if the secretary of state has completed a report outlining the shortfalls of the site for 1 dwelling, it should not be considered for use for 4 dwellings. At the meeting with Christopher Holliday on 26 April the need to meet Government policy for future development was highlighted and understood by many who attended. However, to suggest a site that has recently been rejected by an inspector, appointed by the secretary of state, would suggest that potentially the site has not been fully assessed at the time it was proposed for consultation. With written correspondence from the Houses of Parliament, RT Hon John Hayes MBE, to myself and also the South East Lincolnshire local plan on the 20 April, concludes, with the information provided, I do not consider the site

Neither the allocated site itself, nor any nearby areas of land are identified as being of importance to nature conservation.

**Post Title: 5.8 Accommodation for Gypsies, Travellers and Travelling Showpeople**

suitable as a proposed gypsy/traveller site in the South East Lincolnshire Local Plan. Please see attached correspondance - Houses of Parliament Please see attached correspondance - RT Hon John Hays MBE /South East Lincolnshire Local Plan

Looking at all plans considered by South East Lincolnshire Local Plan no Council owned or brownfield sites have been considered, all proposals I believe are privately owned, by landowners. To look to develop the sites without alternative proposals looks to have limited the selection potential and the site does not fulfil the national planning and government guidelines for a sustainable site

Recent private planning applications have been refused on this site and others on Millgate Appeal Ref: APP/A2525/A/10/2142847 Millgate, Whaplode, PE12 6RT Refused Not convinced that the proposal would help promote sustainable patterns of development or reduce the need to travel, especially by car, as sought by the local plan and planning policy guidance note 13 transport. This, I believe is a brownfield site, looking to be used for business and temporary residential use. It has also been refused on the same grounds that due to the rural location it is unsustainable, however it is over 1km closer to amenities than Bleu Raye Farm.

We are a very rural agricultural community, with large amounts of wildlife and wildlife development in the area. The speed at which the plan has been submitted and the number of assumptions made on the site would suggest that there is the potential that there has not been the available time and resource to fully complete investigations prior to the submission of Bleu Raye Farm to consultation

I have included a chartered surveyor report I have had completed with historical investigation to provide information to my dependents who will feel the financial loss of the value of the property. I am unsure if this adds any potential discussion for the consultation but of course for my family it is of concern. Chartered Survey Report Home farm Valuation Historical investigation and report Relevant Inheritance loss over 40%

**Post Title:** 5.11 The Reuse of Buildings in the Countryside for Residential Use

<b>Response Number</b>	226	<b>Respondent Number:</b>	1158	<b>Comment Author:</b>	Mr Paul Tame	<b>Client</b>		<b>Web Link</b>	
<b>Paragraph Number:</b>		<b>Table/Figure:</b>		<b>Comment Content</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
<b>Policy Number:</b>	20	<b>Map Number:</b>		We support Policy 20 as being totally in line with government policy to give a sensible framework for the reuse of buildings in the countryside.		The support is noted and welcomed.		No change to the Local Plan is required.	
<b>Site Allocation Number:</b>									
<b>Do you consider that this part of the Local Plan is</b>		<b>Do you consider that the Local Plan is unsound because it is not:</b>							
<b>Legally Compliant</b>	<input checked="" type="checkbox"/>	<b>Positively Prepared</b>	<input type="checkbox"/>						
<b>Sound</b>	<input checked="" type="checkbox"/>	<b>Justified</b>	<input type="checkbox"/>						
<b>Prepared in accordance with Duty to Cooperate</b>	<input checked="" type="checkbox"/>	<b>Effective</b>	<input type="checkbox"/>						
		<b>Consistent with national policy</b>	<input type="checkbox"/>						
<b>Compliant, Sound, Duty to Cooperate explanation:</b>									
<b>Proposed changes to make compliant or sound:</b>									
<b>Participate in Examination:</b>	<input type="checkbox"/>								
<b>Why wish to participate</b>									



**Post Title: 5.11 The Reuse of Buildings in the Countryside for Residential Use**

Response Number	518	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:			
Policy Number:	20	Map Number:		We support Policy 20 in principle, as it can both help to protect attractive buildings which are worthy of retention, by giving them a viable use, and also help to meet the need for housing in rural areas. This policy is also consistent with the Government's approach to boosting housing in rural areas, by making efficient use of existing buildings. It is an environmentally sustainable approach to development, due to the potential to re-use existing buildings, with their embodied carbon and energy. It is also socially sustainable, as it can help people to stay within rural communities, rather than having to move away from family and friends to find suitable housing. We do not believe that it is necessary for Policy 20 to be limited to buildings which are of architectural or historic merit, or make a positive contribution to the character of the landscape. This limitation means that many other buildings, which may be suitable for conversion, would not be covered by the policy. This would mean that opportunities would be missed for sustainable forms of development, and to provide housing to meet local needs.		The purpose of the policy is to protect and retain rural buildings with traditional character that are of architectural merit and benefit the rural landscape. Altering the policy in such a way would result in proposals for the conversion of poor quality buildings that make no contribution to the character of the landscape.		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 type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:										
Proposed changes to make compliant or sound:	We suggest that the policy should be made broader, with the inclusion of additional criteria in this regard. We therefore propose that point 2 should be deleted from the policy.									
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.									