

Post Title: 7.1 The Natural Environment

Response Number	230	Respondent Number:	1690	Comment Author:	Marine Management Organisation	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	I am pleased to note reference to the East Marine Plans and Marine Policy Statement within the context (2.0.1) and environmental (7.1.9 and 7.4.1) sections of the plan.		Officer Comment:	The support is noted and welcomed.	
Policy Number:		Map Number:					Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 7.1 The Natural Environment

Response Number	368	Respondent Number:	2386	Comment Author:	Natural England	Client		Web Link	
Paragraph Number:		Table/Figure:	6	Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		Table 6: Nature Conservation Sites within the plan area and within 15km of the Local Plan area boundary Natural England notes that this table indicates that there are no Ramsars, Special Areas of Conservation (SAC) or Special Protection Areas (SPA) within South East Lincolnshire Plan area which is not the case. The Wash falls within both South Holland District and Boston Borough and is designated as a Ramsar, SAC and SPA as well as a site of Special Scientific Interest (SSSI).	Accept Update Table 6: Ramsar 1 and 4 SAC 2 and 7 SAP 1 and 3 SSSI 3 and 50 NNR 1 and 5 LNR 3 and 15 RSPB Unchanged LWS/RIGS Unchanged		Minor modification - Further consideration of this matter will be necessary as part of the Examination.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input 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									

Post Title: 7.1 The Natural Environment

Response Number	369	Respondent Number:	2386	Comment Author:	Natural England	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	24	Map Number:		Natural England welcomes Policy 24: The Natural Environment, as it plans positively for the creation, protection and management of biodiversity. We acknowledge that this policy has been amended to incorporate the findings of the Habitat Regulations Assessment (December 2016) which accompanies the Local Plan. This policy now sets out the requirement for project level HRAs for all major housing proposals within 10km of The Wash and the North Norfolk Coast European Marine Site. We consider that the policy reflects both the guidance in the Habitat Regulations and the National Planning Policy Framework (NPPF) and can therefore be considered as sound.	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 <input checked="" type="checkbox"/> Sound <input checked="" type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input type="checkbox"/> Justified <input type="checkbox"/> Effective <input type="checkbox"/> Consistent with national policy <input type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 7.1 The Natural Environment

Response Number	401	Respondent Number:	1281	Comment Author:	Woodland Trust	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:	
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Policy Number:	24	Map Number:					
Site Allocation Number:				Whilst the South East Lincolnshire Local Plan does acknowledge the fact that there is little woodland in Boston and South Holland District, 2 of the Woodland Trust woodlands (Enos Wood and Westgate Wood) are identified with reasoned justification. Policy 24 should offer more explicit protection to irreplaceable habitats, such as ancient woodland and ancient/veteran trees.	The definition of Ancient Woodland says it was in existence in 1600. Looking at the history of the Internal Drainage Boards for the fens, most drainage did not take place until after that date. Owing to the landscape having little tree cover, and most larger areas being recent plantations it is not considered that "Ancient Woodland" is an appropriate change to the policy. There could be some veteran trees in parks and grounds of large dwellings. However it is considered that Policy 24 section 3a provides protection for veteran trees as does Policy 3 which refers to "trees" and "Natural Habitats".	No change to the Local Plan is required.	

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

Proposed changes to make compliant or sound:

We would like to see the plan give stronger protection to ancient woodland and ancient/veteran trees. As these habitats are irreplaceable we believe that they are worthy of the highest level of protection possible, equal to that you are providing for internationally important sites; a. development proposals that would cause harm to these assets will not be permitted, except in exceptional circumstances We also do not believe it is possible to create a site of equal or greater conservation importance to an irreplaceable habitat like ancient woodland. With only 2.4% of the land area in Great Britain covered by ancient woodland, it is essential that no more of this finite resource is lost. This means that ancient woodland must be protected from permanent clearance, but also that it must be protected from damaging effects of adjacent and nearby land-use that could threaten the integrity of the habitat and survival of its special characteristics. It is not possible to replace ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils. Hydrology, flora and fauna A new green infrastructure strategy is being identified as being necessary, therefore as this scheme is being taken forward, the wide range of benefits which can be provided by green infrastructure should be acknowledged, of

Post Title: 7.1 The Natural Environment

which trees and woodland are a key component. The Woodland Trust's Access to Woodland Standard is a means of calculating the amount of new woodland which may be required, therefore this could be acknowledged with you Local Plan and Policy 24. Please contact us if you would like to discuss the implications of the access standard in more detail or if you would like to work with us and/or private developers on delivery of the new woodland in South East Lincolnshire.

Participate in Examination:

Why wish to participate

Post Title: 7.2 The Historic Environment

Response Number: 366 Respondent Number: 2654 Comment Author: Historic England Client: Web Link:

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

Policy Number: 25 Map Number: The context paragraphs 7.2.1 and 7.2.2 are limited in terms of the information provided and in this respect the text and resulting policy are ineffective. Much more could be made of the uniqueness of the Fens area and its wider landscape through description of its notable features e.g. how it was formed, drains, former windmills, churches and market towns etc. The comments are accepted and discussions about amending the policy will be undertaken with Historic England. Further consideration of this matter will be necessary as part of the Examination.

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

Proposed changes to make compliant or sound:

Table 7 should refer to the latest Historic England figures for heritage at risk (currently the 2016 Register).
 Para.7.2.3 - it is recommended that sustain be replaced with conserve in line with NPPF terminology.
 It is recommended that the policy be revisited and rewritten. It is recommended that the Policy begins by setting out key features for the area e.g. Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced. Opportunities to identify a heritage assets contribution to the economy, tourism, education and the local community will be utilised including: The historic archaeological landscape of the Fens; The distinctive character of South East Lincolnshire market towns and villages; etc etc The list could go on to include the issues raised in 7.2.12, medieval features, the network of historic drainage systems and resulting field patterns, churches and so on. Particular information relating to heritage assets and enabling development could then follow. With regard to the Enabling Development section it is recommended that point vii be added to at the end to include and national policy for the avoidance of doubt. The policy could end with requirements for development proposals such as the following, or a similar alternative: Where a development proposal would affect the significance of a heritage asset (whether designated or non-

Table 6 does not indicate that there is any uniqueness to the area since it sets out figures relating to heritage assets only.

Policy 25 itself is not sound in its current form. It addresses Listed Buildings and Conservation Areas with no reference to Scheduled Monuments (all references to Scheduled Ancient Monuments should be amended to Scheduled Monuments in line with current terminology) or Parks and Gardens. In addition, the policy makes no provision for non-designated heritage including unknown archaeology which may have national significance (NPPF Para 139).

Post Title: 7.2 The Historic Environment

designated), including any contribution made to its setting, it should be informed by proportionate historic environment assessments and evaluations (such as heritage impact assessments, desk-based appraisals, field evaluation and historic building reports) that: a) identify all heritage assets likely to be affected by the proposal; b) explain the nature and degree of any effect on elements that contribute to their significance and demonstrating how, in order of preference, any harm will be avoided, minimised or mitigated; c) provide a clear explanation and justification for the proposal in order for the harm to be weighed against public benefits; and, d) demonstrate that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset. We would be happy to meet to discuss this further with you if you consider this would be of use.

Participate in Examination:

Why wish to participate

Post Title: 7.3 Pollution

Response Number	318	Respondent Number:	1689	Comment Author:	Environment Agency	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	26	Map Number:		The Environment Agency supports Policy 26, and in particular the requirement for applications to include an assessment of the extent of contamination where this is known to exist or is suspected, which accords with paragraphs 109 and 120-1 of the National Planning Policy Framework. Supporting paragraphs 7.3.2-3 provide further guidance for developers on the level of assessment required, and we welcome the inclusion of signposting to Environment Agency guidance on this issue.	The support is noted and welcomed.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input checked="" type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	N/A								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 7.3 Pollution

Response Number	326	Respondent Number:	2187	Comment Author:	Mr John Chapman	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Boston has an acknowledged road transport related air quality issue. The Local Plan is too aspirational and fails to deliver actual planning policies that seek to improve air quality either in the short term or even longer in accordance with the National Air Quality Strategy or National Planning Policy Framework. There are no plans for the delivery of the Boston Transport Strategy (Distributor Road) within its time frame 2016-2036 either through specific guidance or policies. (Appendix 5)		Officer Comment:	The objector has been involved in detailed discussions with regard to both the Local Plan and the emerging Boston Transport Strategy for a number of years and, most recently, this has included highlighting the measures to be taken forward in the Boston Transport Strategy many of which target more efficient use of the existing highway infrastructure and a recognised outcome would be to improve air quality. The Boston Distributor Road can only be a long term outcome unless significant changes occur with regard to funding major transport infrastructure.	
Policy Number:	26	Map Number:						Officer Recommendation:	No change to the Local Plan is required.
Site Allocation Number:									
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> Soun <input 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:	The Local Plan needs to include technical planning guidance specifically targeted towards ensuring improvements to air quality. This guidance and overarching policies should enhance the NPPF and be the cornerstone of a plan of action for delivery of the Boston distributor road and other improvements identified in the Boston Transport Strategy 2016 -2036 and the Local Transport Plan.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 7.3 Pollution

Response Number	402	Respondent Number:	1281	Comment Author:	Woodland Trust	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	The Woodland Trust welcome the statement that managing water quality can have beneficial impacts on the natural environment.		Officer Comment:	The support is noted and welcomed.	
Policy Number:	26	Map Number:					Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:									

Do you consider that this part of the Local Plan is

Legally Compliant

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:

However, we would like the Policy 26 to state more explicitly that improving ways in which aspects of the natural environment are managed can have a beneficial impact on water quality in South East Lincolnshire. In particular, tree planting and woodland creation in the right locations and on the right scale can help bring about significant improvements in water quality. -Trees trap and retain nutrients (such as phosphates and nitrates) and sediment in polluted run-off before it reaches rivers and streams. -They can also prevent spray drift of pesticides by providing a physical barrier between fields and watercourses. - Trees provide shade that is essential in helping prevent a rise in river temperatures and helping freshwater wildlife adapt to climate change. -Trees can also provide a source of woody debris in rivers and streams which is beneficial for many species of plants, invertebrates and fish. We would like to see some mention in the Policy 26 and the supporting text of the role which trees can play in helping to remove air pollutants and hence improve air quality, particularly in urban areas. Usually the most benefit can be gained from planting trees alongside roads and in particular at road junctions. The Woodland Trust has produced a report <http://www.woodlandtrust.org.uk/publications/2012/04/urban-air-quality> which discusses these issues in more detail. There is evidence that urban trees remove large amounts of air

Post Title: 7.3 Pollution

pollution and improve urban air quality (Nowak et al 2006). Columbia University researchers found asthma rates among children aged four and five fell by a quarter for every additional 343 trees per square kilometre (Lovasi et al 2008). The UK has one of the world's highest rates of childhood asthma, with about 15 per cent of children affected and a higher prevalence in lower socio economic groups in urban areas (Townshend 2007). Lovasi. G.. Quinn. J.. Neckerman. K.. Perzanowski. M. & Rundle. A (2008) Children living in areas with more street trees have lower prevalence of asthma. Journal of Epidemiology & Community Health. 62(7). pp. 647-649 Nowak. D., Crane. D. & Stevens. J. (2006) Air pollution removal by urban trees and shrubs in the United States. Urban Foresz Urban Greening. 4. pp. 115-23 Townshend. J.. Hails. S. & McKean. M. (2007) Diagnosis of asthma in children, British Medical Journal. 28; 335(7612), pp. 198-202

Participate in Examination:

Why wish to participate

Post Title: 7.3 Pollution

Response Number	479	Respondent Number:	2075	Comment Author:	Anglian Water	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Anglian Water is generally supportive of Policy 26, however it is suggested that applicants should also demonstrate that proposed developments would not be adversely affected by the normal operation of Anglian Water's existing assets e.g. Water recycling centres (formerly sewage treatment works). Nuisance may be caused by noise, lighting and traffic movements but its most prevalent source will be odours, unavoidably generated by the treatment of sewerage.		Officer Comment:	Policy 3 refers to "the relationship to existing development and land uses", which would cover this concern.	
Policy Number:	26	Map Number:						Officer Recommendation:	No change to the Local Plan is required.
Site Allocation Number:									
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> 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 type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	It is therefore recommended that Policy 26 should include the following wording: Proposals for development adjacent to, or in the vicinity of, existing uses will need to demonstrate that both the ongoing use of the neighbouring site is not compromised, and that the amenity of occupiers of the new development will be satisfactory with the ongoing normal use of the neighbouring site, taking account of the criteria above								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 7.3 Pollution

Response Number	525	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	26	Map Number:		<p>The first paragraph states that proposals will not be permitted where there is an adverse impact with regard to a range of types of pollution. Arguably, many types of new development could lead to some sort of adverse impact. This approach appears to make the policy unnecessarily onerous, and it should be rephrased to clarify that only unacceptable adverse impacts will lead to planning applications being refused. It should also clarify that adverse impacts will be considered in light of any proposed mitigation measures, and in the context of any other benefits which may weigh in favour of granting planning permission.</p> <p>The second sentence of the second paragraph refers to exceptions, which implies an assumption that major planning applications should be refused unless there is a particular justification which outweighs the type of air quality impacts which would normally be expected. This in itself is contrary to Policy 1. We believe that the policy should be reworded, again to clarify that applications will only be refused where there are unacceptable effects on air quality which cannot be mitigated, and which are not justified by other planning benefits.</p>	<p>Inserting "mitigation measures" and "unacceptable" is considered to be appropriate. The text could be amended to read ... "and as a consequence, taking account of any proposed mitigation, have unacceptable adverse impacts upon: 1....</p> <p>Planning decisions weigh all factors in the balance in formulating a decision and so it is not considered necessary to refer to other benefits.</p> <p>It is not considered that the second paragraph, second sentence leads to the conclusion that major applications should be refused unless a justification exists to approve it. This is because the first sentence asks for an air quality assessment and suitable mitigation, if required. If mitigation its not required it supports consent, although there may be other reasons for refusal.</p>		<p>Further consideration of this matter will be necessary as part of the Examination.</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 the issues raised in this representation would be best explained to the Inspector in the format of a round-table discussion.								

Post Title: 7.4 Climate Change and Renewable and Low Carbon Energy

Response Number	231	Respondent Number:	1690	Comment Author:	Marine Management Organisation	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	I am pleased to note reference to the East Marine Plans and Marine Policy Statement within the context (2.0.1) and environmental (7.1.9 and 7.4.1) sections of the plan.		Officer Comment:	The support is noted and welcomed.	
Policy Number:		Map Number:					Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:									

Do you consider that this part of the Local Plan is

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: 7.4 Climate Change and Renewable and Low Carbon Energy

Response Number	319	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:	27	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

We suggest further text is added to A 3. To read: ..and availability of water resources (new housing is required to comply with the Building Regulation water consumption standard to not exceed 110 litres per day per person. Paragraph 7.4.4 to be amended accordingly.

The Environment Agency generally supports Policy 27 and the points it is advocating. However, in respect of water resources, we believe this is a missed opportunity to aspire to a higher standard of water resource protection. Within the 2013 report 'Water stressed areas final classification' the area of England serviced by Anglian Water Services is identified as an area of serious water stress. This high level assessment is based upon individual assessments of waterbodies. Although, as noted in paragraph 7.4.4 of the Local Plan, the specific South East Lincolnshire area is not classified as water stressed, we believe that the plan should still require the lower water consumption standards - the impacts of climate change during the plan period, and over the lifetime of the housing being planned for, could result in more extreme weather patterns and frequent droughts could be experienced. This issue has been acknowledged within the Sustainability Appraisal but, in our opinion, it has not resulted in a sufficiently strong policy within the Local Plan. The importance of water management is recognised by the Greater Lincolnshire Local Enterprise Partnership (GLLEP). In addition to inclusion as a strategic priority within their Strategic Economic Plan (SEP) and European Structural Investment Funding Strategy (ESIF), the GLLEP's Water Management Plan identifies the GLLEP's aim is 'for water management across Greater Lincolnshire to act as an incentive to investment for the GLLEP's priority industries and for effective water management to be a positive contributor to economic growth. In addition, the GLLEP has identified the delivery of water efficiency measures through housing growth as a priority in order to address future water resource issues, and to support an increased need for both housing and employment growth. This is particularly prudent within sectors where water is a key and significant requirement e.g. Agri food and seasonal tourism.

A recent draft paper produced for the Water Resources East project led by Anglian Water supported the use of the 110 litre level. The draft report recommends: That Government should strengthen the commitment to water demand management measures through instigating changes to the Building Regulations within areas of water stress that would make higher standards in such areas automatic - rather than optional - for local authorities. The provision of increased water efficiency measures will support wider economic growth objectives both within South East Lincolnshire and

The 110l per person per day standard was not required because we do not think we have grounds to justify it. The "Water stressed areas - final classification July 2013" does show that the Anglian Water Area as Serious but the map in Figure 2 suggests most of the area is Low or moderate.

The reference to the Anglian Water report does not justify the Local Planning Authority changing the standard as it seeks Government to amend the Building Regulations.

We acknowledge the sense in requiring the standard and the suggested costs do not appear to be a barrier. Therefore, if the Inspector wishes to make this change, the Local Planning Authority would accept the change.

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

Post Title: 7.4 Climate Change and Renewable and Low Carbon Energy

across Greater Lincolnshire. Whilst we recognise that some developers may highlight these standards as a viability issue, we would draw their/your attention to the DCLG Housing Standards Review (Sept 14) and in particular Section 4.5 Water and Appendix B5 of the document which indicates the additional cost of upgrading from the national standard set out in the Building Regulations (of 125 litres/person/day) to meet the tighter Building Regulations optional requirement of 110 litres/person/day (equivalent to Code for Sustainable Homes level 3/4) is no more than £9 per dwelling. This amount will be offset by cost savings to the householder (excluding possible energy savings) in the order of £20 per annum (Assumes a saving of 15 litres/day/person 2.4 persons per dwelling, 365 days per annum and a cost of water at £1.5138 per cubic metre of water, AWS current price for metered water). A requirement to ensure all new housing development complies with the 110 litres/person/day standard will have benefits to the consumer, the environment and provide house builders with an attractive selling point. It is our opinion that the policy as currently written is missing this opportunity.

Response Number	367	Respondent Number:	2654	Comment Author:	Historic England	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content		Officer Comment:		Officer Recommendation:	
Policy Number:	27	Map Number:				Accept.		Further consideration of this matter will be necessary as part of the Examination.	
Site Allocation Number:						Change Part B point 6 to: heritage assets and their setting; and,			
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 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:	Part B Renewable Energy, Point 6 - it is recommended that this be amended to heritage assets and their setting; and,								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 7.4 Climate Change and Renewable and Low Carbon Energy

Response Number	480	Respondent Number:	2075	Comment Author:	Anglian Water	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	27	Map Number:		Reference is made to the South East Lincolnshire Local Plan area not being located in a water stressed area based upon the evidence provided by the Environment Agency's Water Stressed Areas - Final Classification (July 2013). However the Environment Agency has advised the Secretary of State that the areas classified as 'Serious' in the final classification table of the above document should be designated as 'Areas of serious water stress'. The Anglian Water company area is considered to be such an area and includes the whole of Boston Borough and South Holland District (the plan area). The Housing Standards Review Cost Impact report (2014) prepared for DCLG advises that the cost of introducing such a standard would be between £6-£9 per dwelling. The above report is available to view at the following address: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/353387/021c_Cost_Report_11th_Sept_2014_FINAL.pdf	The 110l per person per day standard was not required because we do not think we have grounds to justify it. The "Water stressed areas - final classification July 2013" does show that the Anglian Water Area as Serious but the map in Figure 2 suggests most of the area is Low or moderate. We acknowledge the sence in requiring the standard and the suggested costs do not appear to be a barrier. Therefore, if the Inspector wishes to make this change, the Local Planning Authority would accept the change.	Further consideration of this matter will be necessary as part of the Examination.
Site Allocation Number:						

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

Therefore for the above reasons Anglian Water consider that there is sufficient evidence to demonstrate that the optional higher water efficiency standard (110 litres per day) for residential development should be applied in the plan area. It is therefore proposed that Policy 27 should be amended to include the following wording: Residential developments comply with the Building Regulation water efficiency standard of 110 litres per occupier per day It is also therefore proposed that para 7.4.4 should be amended as follows: Water supply has been improved with new infrastructure to the Local Plan area, and However the Environment Agency indicates that South East Lincolnshire is not a Water Stressed Area⁶Therefore, it is not considered necessary to require a reduced standard of wholesome water use from the current Building Regulation standard of 125 litres/per person/per day to the optional water efficiency standard of 110 litres/per person/per day. However, should these circumstances change the relevant reduced standard will be required¹⁰. Water stress can be helped by employing rainwater and grey water conservation and recycling measures in new development to reduce the consumption of wholesome water.

Participate in Examination:

Why wish to participate

Post Title: 7.5 Community, Health and Well-being

Response Number	248	Respondent Number:	878	Comment Author:	Matrix Planning Ltd.	Client		Web Link	
Paragraph Number:	7.6	Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	28	Map Number:		The policy guards against the loss of, but does not positively promote new community facilities as encouraged by Policy 70 of the NPPF. Given the rarity of new facilities they need some help to get past 'go'. I suggest a presumption in favour of new community facilities.	The principle of a more positive and supportive approach is accepted, although a very slightly different wording is considered to be preferable. Thus, it is considered appropriate for the first line of the final paragraph to be reworded to read "The development of new community facilities will be supported, provided that they are located so as to be:"		Further consideration of this matter will be necessary as part of the Examination.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input 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:	Last paragraph of policy 28: "New community facilities will be treated favourably provided.." then continue with present items 1-4								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 7.5 Community, Health and Well-being

Response Number	297	Respondent Number:	1272	Comment Author:	theatrestrust2	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	<p>The Trust generally supports the aim of Policy 28, as it seeks to safeguard community and cultural facilities, reflecting the requirements of para 70 of the NPPF. However, it doesn't promote the provision of new facilities. We would therefore recommend adding the following clauses: - Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres. - Major developments are expected to incorporate, where practicable, opportunities for cultural activity to widen public access to art and culture, including through the interpretation of the heritage of the site and area.</p>		Officer Comment:	<p>The principle of a more positive and supportive approach is accepted, although a very slightly different wording is considered to be preferable. Thus, it is considered appropriate for the first line of the final paragraph to be reworded to read "The development of new community facilities will be supported, provided that they are located so as to be:"</p>	
Policy Number:	28	Map Number:		Officer Recommendation:	<p>Further consideration of this matter will be necessary as part of the Examination.</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 checked="" type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>			
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	<p>To fully reflect guidance in para. 70 of the NPPF, we would recommend adding the following clauses: - Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres. - Major developments are expected to incorporate, where practicable, opportunities for cultural activity to widen public access to art and culture, including through the interpretation of the heritage of the site and area.</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 7.5 Community, Health and Well-being

Response Number	522	Respondent Number:	1187	Comment Author:	Spalding and District Civic Society	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Neither legally compliant nor sound, for the reasons set out in our comment on Inset Map 2.		Officer Comment:	Officer Recommendation:	
Policy Number:	28	Map Number:		See also our introductory comments on Chapter 7 of the Draft Public Consultation version of the Plan.	Where a development will increase the need for sports facilities, recreational open space or other green infrastructure, policy 28 requires the development to support the provision of new facilities and/or the enhancement of existing facilities. However, it would not be reasonable for the Local Plan to seek to require a development to provide open space to meet an existing shortfall.		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 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:	Insert in either Policy 28 or as one of the subsequent paragraphs:- Where there is acknowledged deficit of existing green recreational space (principally Spalding, Holbeach and Sutton Bridge), the Local Authority will actively seek to secure suitable sites to make up or reduce the shortfall.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									