

Post Title: 8.0 Introduction

Response Number: 498 Respondent Number: 2811 Comment Author: Mr M Ferriday Client: Web Link:

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

Policy Number: Map Number: Site Allocation Number: **Comment Content:** **Officer Comment:** **Officer Recommendation:**

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

Para 8.0.4 (Page 90) makes the following statement about the bus network. The bus network is relatively good. It is not good, it is in fact very poor; admittedly it has become poorer due to Lincolnshire County Council's reductions in subsidies for un-remunerative routes, possibly since the document was prepared. An example of how bad it is, and there are many, is no Sunday services at all in Boston. There are sections of Boston which have no service (SE Boston, Marsh Lane, Wyberton Low Road etc), (NW Boston, Rosebery Avenue, Punchbowl Lane etc) There are no evening services, except one Skegness service. Spalding fares slightly better, with at least a good service to Kings Lynn, via Holbeach and Sutton bridge, and a Sunday service to Peterborough and Kings Lynn. I feel the Into Town Services have not worked well. They don't carry large numbers and they cannot be frequent enough to encourage people to use them. I have traveled on all the routes both in Boston and Spalding. Boston's best service is the inter connect to Lincoln, which says it all.

Bus services in Boston and Spalding are relatively good for towns of their size in a relatively rural location. It is acknowledged that bus services are commercial enterprises and run along routes that are most likely to generate income for the operators. The last sentence of para 8.0.4 acknowledges that services are limited in the evenings and at weekends and outside the Sub-Regional Centres. The second sentence of paragraph 8.1.9 adds that expansion of the IntoTown services and the InterConnect services or as extensions to these routes could help tackle congestion by taking cars off the roads. There is no evidence to suggest that developers are not interested in supporting bus services through new development.

No change to the Local Plan is required.

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

The bus services are very much limited by the operators profitability and the level of subsidy the County Council is willing to give. I think everyone understands this. If Brylaine or Stagecoach or Centre bus cannot make money, or the County Council wont support a route, why should they operate it? I do think the statement in 8.0.4 The bus network is relatively good is misleading and the comment that Bus services play an important role in tacking congestion and improving access across SE Lincs (Para 8.1.9 is simply not true. We have among the lowest percentage ridership in the UK. The comment about developers helping to provide future extensions (para 8.1.9) also should be deleted as they are not remotely interested in public transport

Participate in Examination:

Why wish to participate

Post Title: 8.1 Delivering a More Sustainable Transport Network

Response Number	254	Respondent Number:	1677	Comment Author:	Deeping St Nicholas PC	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	The village needs more help to improve transport links. There is a lack of support for Local Bus Services and any future housing activity must address this problem with money guaranteed to support these services. Direct links to Peterborough at a more affordable cost, are vital to this village.		Officer Comment:	Policy 29 supports the ongoing provision and appropriate extension of bus services. It is unlikely that the level of development identified for Deeping St Nicholas will be sufficient to justify a new bus service, however it should be possible through Policy 7 for contributions to be sought to aid delivery/enhance infrastructure such as bus stops, should the bus operators consider there is sufficient demand to do so.	
Policy Number:	29	Map Number:		Officer Recommendation:	No change to the Local Plan is required.				
Site Allocation Number:									
<p><i>Do you consider that this part of the Local Plan is</i></p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input type="checkbox"/></p> <p>Effective <input checked="" type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	We would like to see the reopening of Littleworth Station, as a long-term aim, added into the Local Plan. There has been a feasibility study done and with more housing projected locally, we feel there is case to include this project in the Local Plan.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 8.1 Delivering a More Sustainable Transport Network

Response Number	257	Respondent Number:	2263	Comment Author:	Mr R Aiken	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:	29	Map Number:		The proposed Northern and Southern sections built in isolation with no connecting road will not provide relief and will only increase congestion in Spalding Town Centre. Traffic coming from the west and following A151 signage does not have an easy route along Winsover Road, Pinchbeck Road, West Elloe Avenue and Holbeach Road. The A151 is the main road from the Colsterworth junction on the A1 to the A17 close to Holbeach. It then becomes lost in Spalding. If Northern Link was built the first section from the A16 roundabout closest to the Power Station to the Enterprise Park and to the proposed roundabout on Pinchbeck Road already exists. The second section could be the cul-de-sac Northern section of the proposed SWRR. If this then had a new section of road continuing to link up on Dozens Bank somewhere to the south of Glenside south this would effectively re-instate the A151 as a continuous route. This would give easy access from the west to Enterprise Park and the A16 for onward travel to the North, South and East. It would avoid through traffic in Spalding and also Pinchbeck. This road could also be the boundary between Spalding and Pinchbeck with the development being between the road and the Vernatts. A link road to the south with a bridge over the Vernatts drain would complete the network. This Northern link would mirror what has been done in Bourne where the A151 used to run through the town centre. It is now routed through an industrial area before the town centre and on to a new section of road - Raymond Mays Way - built in 2005, then connecting with the original A151 to the west of Bourne. There is housing development all along Raymond Mays Way. My main concern is the future (short and long term) of Monks House Lane, Wygate Park and Woolram Wygate. Originally an estate road built with developers funds it has build outs and mini roundabouts. It conveniently links Bourne Road at the Broadway crossroads to Pinchbeck Road. There seems to be no reference in the plan to this road - is this in effect the central section? As to the local plan being sound. If the completed road is not built prior to large scale development on the western side of Spalding and Pote Hole then No. Also No until confirmation of Monks House Lane and Wygate Park will not be part of the relief road. A project as important as this should not have to rely on the developers contribution to deliver only sections of the scheme when it suits them. Before my suggestion of the Northern Link is dismissed on cost	These comments essentially support the completion of the proposed Northern section of the Spalding Western Relief Road (SWRR) and the first phase of the Central Section (down to the A151 Bourne Road) as soon as possible, and this to be welcomed. Proposed Policy 12: Vernatts Sustainable Urban Extension (Vernatts SUE) requires the completion of this length of road before Phase 3 the Vernatts SUE (some 3,000 dwellings) can be completed. Furthermore, apart from the limited residential development on sites to the west of Spalding proposed in the Publication Version of the Local Plan, it is not intended to identify any further land for housing development in this area pending further work on agreeing a 'Delivery and Funding Strategy' for the entire length of the SWRR. The completion of this length of the SWRR would not include use of Monks House Lane and Wygate Lane but, instead, serve to attract traffic away from these residential roads.	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: 8.1 Delivering a More Sustainable Transport Network

I would suggest a Business Partnership be established between developer(s), Investors (of which there could be many), County Council and the Government. The Government has made available Local Roads Funding for Councils of £1.2 billion in the 2017-2018 Financial Years.

Response Number	323	Respondent Number:	1697	Comment Author:	Highways England	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:		Map Number:		Highways England welcomes the opportunity to provide comment on the Publication version of the South East Lincolnshire Local Plan that covers the period 2011-2036. It is acknowledged that this constitutes the last consultation stage before the Plan is submitted to the Secretary of State and relates primarily to whether the Plan is sound and complies with legal and procedural requirements. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is the role of Highways England to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the South East Lincolnshire Local Plan, Highways England's principal concern is safeguarding the operation of the A1 which routes some 15 miles to the west of the Plan area. It is acknowledged that within the Plan a total provision of 18,675 dwellings are allocated to come forward across the Local Plan period. Of this amount, 7,550 dwellings are allocated to the Borough of Boston and 11,125 dwellings to the District of South Holland. In addition to this, Highways England also notes that an allocation of approximately 165 hectares of employment land has been proposed in the Local Plan. Highways England previously commented on the South East Lincolnshire Local Plan in August 2016 and considered that, owing to the distance of the A1 from the Local Plan area, there would be no direct impacts on its operation as a result of the proposals in the Plan. Highways England retains this position in relation to the current consultation document. Highways England has no further comments to provide, and trusts the above is useful in the progression of the South East Lincolnshire Local Plan.	Comments noted and welcome.	No change to the Local Plan is required.
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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: 8.1 Delivering a More Sustainable Transport Network

Response Number	337	Respondent Number:	1238	Comment Author:	Pedals	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:
Policy Number:	29	Map Number:		We object to the omission of the proposed cycle route between West Elloe Avenue and Woolram Wygate from the list of routes in Policy 29C. This had been listed in Policy 31C of the 2016 version of the Local Plan. This proposal is an important component in the creation of a joined-up cycling network linking Spalding with Pinchbeck, in accordance with Strategic Priority 11. We do not know why it is not included in the latest version of the Local Plan. In our comments on Policy 31 of the 2016 version we stated our support for a cycle route alongside the Coronation Channel, on the east bank, and noted its omission from Inset 2. Subsequently we have seen Lincolnshire County Council's feasibility study for this route [copy provided by post] and support its contents	Comments noted. The contents of the Spalding Coronation Channel Cycleway Feasibility Report by Lincolnshire County Council, November 2016 have been noted. Change Policy 29 to add: C2vi. Between West Elloe Avenue and Enterprise Way; For consistency with the LCC Feasibility Study change Policy 29 C2 to: v. Alongside the Coronation Channel, Spalding;				Further consideration of this matter will be necessary as part of the Examination.
Site Allocation Number:									
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> Soun <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input 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:	Include "vi. between West Elloe Avenue and Enterprise Way." in the list of routes in Policy 29 C2. Omit the words "(east bank)" from item v. of the list of schemes in Policy 29 C2. Amend the position of the "Proposed Cycle Route" annotation to reflect Lincolnshire County Council's feasibility study for the route alongside the Coronation Channel.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 8.1 Delivering a More Sustainable Transport Network

Response Number	403	Respondent Number:	1843	Comment Author:	Neil Kempster	Client		Web Link			
Paragraph Number:		Table/Figure:		Comment Content	We support the objective of delivering a more sustainable transport network and in particular the proposals to bring forward the Boston Distributor Road as part of the identified growth sites in the Boston area. We are currently delivering the initial phase of the BDR at Q1 having worked in partnership with the relevant bodies to bring this complex project to fruition. The next leg of the BDR through Q2 is a logical extension to this project and quite rightly forms a priority in both the Boston Transport Strategy, as well as within this policy.		Officer Comment:	Support for BDR is welcome and noted.			
Policy Number:	29	Map Number:	1				Officer Recommendation:	No change to the Local Plan is required.			
Site Allocation Number:	Sou 006										
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	As promoter of the Site Sou 006 we believe we will play an important role in the delivery of the next phase of the Boston Distributor road which will follow on from the existing initial part of the road which is being delivered as part of the Q1 development.										

Post Title: 8.1 Delivering a More Sustainable Transport Network

Response Number	454	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:	29	Map Number:		Policy 29 "Delivering a More Sustainable Transport Network" is generally supported for setting aspirational transport objectives. Paragraph 8.1.3 of the Local Plan shows that the Spalding and Boston relief roads are specifically identified under this Policy. The final sentence of the Policy states,		Whilst it would be desirable to have a 'mechanism for the delivery of the entirety of the Spalding Western Relief Road' set out in the emerging Local Plan, it is not considered essential for this to be the case in order for the Local Plan to be deemed effective. This is because the Local Plan is limited in respect of proposing housing allocations that it expects to be delivered in the period up to 2036 that would require access via any part of the Spalding Western Relief Road (SWRR). Notwithstanding the above comments, there are presently ongoing detailed discussions between Lincolnshire County Council, as Highway Authority, South Holland District Council and Broadgate Homes regarding the funding arrangements for the Southern Section of the SWRR, which is being provided in association with the current development of the Holland Park urban extension. (NB: this matter forms one of a number of projects that have been the subject of a recently-successful Homes and Communities Agency funding bid.) Officers are keen to extend such discussions to include the Northern Section of the SWRR (which is required to access the first two phases of the proposed Vernatts Sustainable Urban Extension [see Policy 12: Vernatts Sustainable Urban Extension]) and, ideally, the final Central Section before commencement of the Local Plan examination. The representation incorrectly attributes the text referring to 'enabling the delivery of the Northern and Southern sections of the Spalding Western Relief Road...' to criterion 2 whereas it should be criterion 3. As amended, Broadgate Homes Ltd is seeking a consolidation of criteria 3 and 6 to include provision for, in effect, a type of Community Infrastructure Levy (CIL) arrangement for the purpose of securing funding for the SWRR and Boston Distributor Road (BDR) from as a wide a variety of future developments in their respective towns as possible. It should be noted that the final version of the South East Lincolnshire Whole Plan Viability Study (as approved by Peter Brett Associates on 24 March 2017) states in its Executive Summary (point 6): 'We have worked with the client team to consider the most appropriate developer funding mechanism to adopt. At the start of the Study, both the Community Infrastructure Levy (CIL), and the Section 106 (S106) developer funding mechanisms were considered. After taking account of how best to secure the delivery of planned growth, and the possible changes expected			
Site Allocation Number:				"All development should contribute to the delivery of necessary transport infrastructure either directly, where appropriate or indirectly such as through developer contributions or CIL. Payment"		Further consideration of this matter will be necessary as part of the Examination.			
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 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.								
				This objective is supported although the mechanism for the delivery of the entirety of the Spalding Western Relief Road must be put in place by the plan as a whole to pass the test of soundness of being effective. Paragraph 8.2.7 is Worded to allow financial Contributions arising from early housing development at Spalding to potentially be spent on town centre schemes, that will achieve only short-term capacity benefits, but are not in the longer-term interest of the town's road network. This paragraph states "future eligible housing and other developments in Spalding and Pinchbeck are required to fund separate elements of the SWRR or other mitigation solutions from a package of transport measures in the town....". This is an aspect of the Plan that must be revised before the Examination through consultation between Broadgate and key stakeholders as suggested below.					
				Criterion 2 of Policy 29 sets out an objective of "enabling the delivery of the Northern and Southern sections of the Spalding Western Relief Road associated junctions and Crossing points." Whilst criterion 6 states "Identifying safeguarding routes on the Policies Map within which the Central section of the Spalding Western Relief Road and Phase 3 of the Boston Distributor Road will be delivered (outside this plan period). Any development that would prejudice the design of this infrastructure will not be permitted."					
				Policy 29 is a policy that sets an objective but does not set a workable delivery mechanism and Broadgate request that criteria 2 and 6 should be consolidated in to a single policy objective which states,					
				"Enabling the delivery of the entirety of the Spalding and Boston Relief Road within the safeguarded routes					

Post Title: 8.1 Delivering a More Sustainable Transport Network

identified on the Proposals Map. Any development that Would prejudice the design or implementation of this infrastructure will not be permitted and any development (housing, employment or retail) coming forward with these settlements, within the lifetime of the plan will contribute through an equitable financial contribution to its funding accompanied by an agreed phasing programme."

The timescales for CIL are unclear and further policy guidance is necessary to expressly ensure that development coming forward at Spalding and Boston makes a proportional contribution to the funding of the wider relief road which serves to relieve congestion at the Settlement as a Whole.

This requirement to contribute to the cost of these strategic routes is addressed more specifically at Policy 30 "Delivering the Spalding Transport Strategy" which targets all allocations and any non-allocated site of more than 11 dwellings as "funding projects featured in the Spalding Transport Strategy but excluding the Northern and Southern Sections of the SWRR. This wording is not equitable given the considerable costs of the first phases of road infrastructure at Holland Park and in the north sector where expensive bridging is necessary.

For these reasons Broadgate strongly objects to Policies 29 and 30 as it is felt the policies, as drafted, will have the practical effect of frustrating the delivery of housing of the Spalding Western Relief Road and given the strategic function of this direction of growth for the settlement and the local plan strategy, this shortcoming Would make the plan unsound. This can be corrected by a rewording of the policy to ensure that a development agreement is in place which will commit landowners at an early stage to the delivery of the SWRR. However, the policy as currently Worded, will encourage piecemeal development and frustrate the delivery of the strategic link which will have the opposite effect of what the plan seeks to achieve. The current policy, as Worded, promotes two types of contribution regime for the Spalding Western Development; one that looks for contributions to the road, and another which seeks contributions to short-term town centre improvements. These town centre improvements do not appear to be identified at this stage, which is a serious short coming of the policy. The link expressed within the policy to the Bourne Road is not within Broadgate's control, and should not be referenced within the policy, as this will

following the national review of CIL, a decision was taken in November 2016 by the client team to use S106 as the preferred developer funding mechanism. This has informed further refinements to the approach adopted for this viability vstudy' (sic).
In view of the above, there is currently no intention for either Boston Borough Council or South Holland District Council, as the relevant potential CIL charging authorities, to commence the preparation of a CIL. Accordingly, and having regard to the consideration of the comments made by Broadgate Homes Ltd in respect of Policy 30: Delivering the Spalding Transport Strategy, it is intended to hold discussions with this company and other interested parties with the intention of exploring and agreeing funding arrangements for the BDR and SWRR before the Local Plan examination commences (see response to comments by Broadgate Homes Ltd on Policy 12).

Post Title: 8.1 Delivering a More Sustainable Transport Network

inhibit housing delivery.

Response Number	523	Respondent Number:	1187	Comment Author:	Spalding and District Civic Society	Client		Web Link					
Paragraph Number:	8.1	Table/Figure:		Comment Content	Officer Comment:				Officer Recommendation:				
Policy Number:	29	Map Number:		<p>Section 8.1 is unsound (being not effective). A proposal that is absurd must ipso facto be unsound. Our comments on the South West Relief Road are set out in our response to the Draft Public Consultation version of the Plan (introduction to Chapter 5 and 8.1.7). One aim of the road is the relief of traffic congestion in the town centre South Western Relief Road but the road will remain incomplete during the life of the Plan. Hence, no relief. Further, the increased housing needed to fund the two ends of the road will, on the contrary, exacerbate the congestion. And even after 2036 the completion is uncertain, being dependent on developers hypothetical readiness to undertake further huge housing developments. The ultimate responsibility for the absurdity lies in the government ideology that requires major infrastructure to be funded by developers. (Had the current ideology been the case some years ago, Spalding would still be without a bypass!) As the road cannot be considered effective in relieving the centre of congestion during the life of the Plan, it must be unsound.</p>	<p>The Spalding Transport Strategy - September 2014 (STS) makes clear that the proposed Spalding Western Relief Road (SWRR) 'has been identified as a vital piece of infrastructure if the desired housing and employment growth levels are to be attained in Spalding and appears in LTP4 as one of four major schemes in Lincolnshire. In addition to its key role as an enabler of economic growth, the SWRR would serve as a relief road for Spalding. Work undertaken as part of this study shows that the SWRR will be effective in reducing the number of trips which currently pass through town on the A151. It will provide faster access to areas to the north, west and south of the town; and by removing car journeys from the town centre, queues and delays at the level crossings will be minimised.'</p> <p>The STS also makes clear that 'Developer contributions through mechanisms such as Section 106 or the Community Infrastructure Levy (CIL) will be used to fund the majority of the SWRR.'</p> <p>As a consequence of the need to rely on developer contributions to fund its delivery, it is expected that the road is unlikely to be completed within the current Local Plan period.</p>								
Site Allocation Number:		<p>Do you consider that this part of the Local Plan is</p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							<p>Do you consider that the Local Plan is unsound because it is not:</p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input type="checkbox"/></p> <p>Effective <input checked="" type="checkbox"/></p> <p>Consistent with national policy <input type="checkbox"/></p>		<p>No change to the Local Plan is required.</p>		
Compliant, Sound, Duty to Cooperate explanation:													
Proposed changes to make compliant or sound:	<p>As the concept and ideology on which the scheme is based are in our view fundamentally flawed, it is not possible to suggest modification, other than key infrastructure should be funded by central government.</p>												
Participate in Examination:	<input type="checkbox"/>												
Why wish to participate													

Post Title: 8.1 Delivering a More Sustainable Transport Network

Response Number: 538 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: 29 Map Number: Site Allocation Number: Policy 29 outlines the Authorities commitment to work with partners to make best use of, and seek improvements to, existing transport infrastructure and services within, and connecting to South East Lincolnshire, having considered first solutions that are based on better promotion and management of the existing network and provision of sustainable forms of travel. For the road-based transport network, this will be by, inter alia enabling the delivery of Phase 2 of the Distributor Road, associated junctions and crossing points; and identifying safeguarding routes on the Policies Map, within which Phase 3 of the Boston Distributor Road will be delivered (outside this plan period). Any development that would prejudice the design of this infrastructure will not be permitted. It is reiterated that the BDR is deemed unnecessary. As per the findings of the SPRU report which assesses the South East Lincolnshire IDP (2016), the IDP fails to make it clear how the BDR will benefit Boston. The transport strategy recognises the need for the scheme, and it will, as stated at paragraph 4.8.1, provide traffic with an alternative route to travelling through and around the town centre and unlock delivery of the proposed housing land. However, there is little evidence to support this. In fact, the Baseline Study is contradictory to this, stating at paragraph 4.23.4: Whilst it was anticipated that the distributor road will have some relieving effect on existing traffic routes by providing an alternative, modelling of the proposals indicated that any benefit to traffic in Boston is marginal. There has been another modelling study completed within the Boston Transport Strategy (also November 2016) however these findings are not referred to in the IDP and it is not clear what the wider impacts or benefits will be. The BDR is also relying on the creation of a new bridge across the South Forty Foot Drain and adjacent railway, which has been a concept for years. However if this is not built, the development of the BDR, combined with the housing developments, will add to the congestion which already occurs at the mini roundabout where Boardsides meets the Sleaford Road and the A52 (paragraph 4.8.14 of the IDP). However there is no bridge crossing planned for as of yet, and it does not form part of the Local Transport Plan funding and it is not clear when it will be delivered. This suggests that the BDR may cause more harm than good. The IDP also states that the River Witham needs a bridge and the B1183/Railway/Maud Foster and Willoughby Road

The Boston Transport Strategy sets out the benefits of the Boston Distributor Road. The Local Plan has been drawn up to show how a significant part of the route will be delivered over the plan period.

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

Reference to the Boston Distributor Road should be removed from the Policy as there is no evidence as to what the wider impacts or benefits of the road will be.

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: 8.1 Delivering a More Sustainable Transport Network

needs significant transport structures to cross, estimated at a cost of £80 to £100m. The Baseline Study states at paragraph 4.23.4: there are sections requiring major structures over rail, road and water that cannot be funded at present and, without which, the route will not function as a distributor road. Clearly, they still cannot be funded at present. The modelling scenario in the Boston Transport Strategy (2016) is also based on this infrastructure being provided, and does not model a scenario based on the chance that this infrastructure cannot be funded, which is entirely possible. It is unclear what the impact of the scheme would have on existing transport networks if only partially completed. Either way, the entirety of the infrastructure cannot be provided until after the plan period (this is made clear in the Transport Strategy) and one of the arguments against the BDR (Transport Strategy 2016, page 153) is that funding should be going towards more sustainable schemes which are less intrusive and encourage people to use their car less, and future schemes should be aiming at mitigating climate change, not increasing it. Parts of the BDR will be brought forward through sustainable urban extensions, and the argument is that these developments will utilise it. However, the BDR is heavily reliant on these various developments coming forward, and if they fail to this could jeopardise large sections of the scheme. The alternative would be to secure any remaining funding from central government, which is a very competitive process whereby a compelling case to un-lock development from significant amounts of funding is required. The Council has not identified any potential sources of funding. Given the required cost it would seem overly ambitious to consider that the necessary funding to complete the scheme would ever be made available, particularly if the County Council are of a position where they consider the distributor road would have little impact. Nevertheless, these developments are not funding the large major structures mentioned above; which the scheme cannot function successfully without. Referencing the BDR in Policy 29 is therefore unjustified and is not required to meet the infrastructure needs of the Borough given the evidence in the IDP and should be removed.

Post Title: 8.2 Delivering the Spalding Transport Strategy

Response Number	456	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:	30	Map Number:		Paragraph 8.2.3 relating to Policy 30 aims to provide a mechanism for securing developer contributions towards the delivery of the SWRR and other complementary solutions to current transport management issues in Spalding. The policy itself seeks to disaggregate the northern and Southern Sections of the SWRR. The wording of this Policy 30 should be revised and re-titled to read "Delivering the Spalding Western Relief Road." Revised wording for this policy to make it sound could have the objective of ensuring housing allocations and all development including housing, employment and retail at the settlement of Spalding and Pinchbeck are subject to proportional financial contributions toward the delivery of the SWRR and shall come forward in line with an agreed phasing plan programme. In respect of Policy 30 Broadgate will commit, between now and the Examination of the Plan, to seek to negotiate further with the authorities to produce a transport policy that places both certainty of provision to, and equity in terms of developer Contributions towards, the Spalding Western Relief Road, thereby ensuring that development in Spalding is sustainable and that the Plan is both Effective and consistent with National Policy as required by paragraph 182 of the National Planning Policy Framework. For these reasons Broadgate strongly objects to Policies 29 and 30 as it is felt the policies, as drafted, will have the practical effect of frustrating the delivery of housing of the Spalding Western Relief Road and given the strategic function of this direction of growth for the settlement and the local plan strategy, this shortcoming Would make the plan unsound. This can be corrected by a rewording of the policy to ensure that a development agreement is in place which will commit landowners at an early stage to the delivery of the SWRR. However, the policy as currently Worded, will encourage piecemeal development and frustrate the delivery of the strategic link which will have the opposite effect of what the plan seeks to achieve. The current policy, as Worded, promotes two types of contribution regime for the Spalding Western Development; one that looks for contributions to the road, and another which seeks contributions to short-term town centre improvements. These town centre improvements do not appear to be		The Spalding Transport Strategy (STS) makes clear (in section 1.1) that it seeks to provide: ‘an approach to the improvement and provision of transport and access for the town and surrounding area. The Strategy addresses existing issues and supports proposals for significant growth in the town in the short, medium and long term. The Strategy covers provision of improved and sustainable transport policy, services and infrastructure. It is designed to support economic development aiding the long term prosperity of Spalding and the surrounding area.’ The delivery of the SWRR represents the largest and most expensive project in the STS, and there is a desire to see the completion of the full length of its route as soon as possible, as only then can its full benefits be realised. However, the emerging Local Plan recognises that, in practical terms, its delivery will have to be delivered in phases over a length of time probably extending beyond the period of the Local Plan. In the meantime, additional housing and other developments across the Spalding and Pinchbeck areas will serve to exacerbate various existing transport-related issues. For example, recent traffic modelling has confirmed that the proposed 1,000 or so dwellings to be accessed off the Northern section of the SWRR (ref. Policy 12: Vernatts Sustainable Urban Extension [Phases 1 and 2]) will create significant traffic problems along the Pinchbeck Road. Accordingly, Policy 30: Delivering the Spalding Transport Strategy (Policy 30) adopts a complementary ‘two-pronged’ approach to securing transport improvements across the town: the first seeks contributions to the delivery of the Northern section of the SWRR from those proposed housing allocations which will be served by it; and the second seeks contributions to the delivery of other STS projects relating to traffic-management improvements from all other proposed housing allocations (in Spalding and Pinchbeck), plus any ‘windfall sites’ granted planning permission for development. The latter approach will be informed by work on the prioritisation and costing of projects which will be undertaken by Lincolnshire County Council, as Highway Authority. This work is expected to be well under way come the Local Plan examination and, therefore, it will be possible for Lincolnshire County Council to demonstrate commitment in this regard. Regardless of whether contributions are made to the		Further consideration of this matter will be necessary as part of the Examination.	
Site Allocation Number:									
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> Soun <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input type="checkbox"/> Justified <input 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:									
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.								

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identified at this stage, which is a serious short coming of the policy. The link expressed within the policy to the Bourne Road is not within Broadgate's control, and should not be referenced within the policy, as this will inhibit housing delivery.

delivery of the SWRR or other STS projects, the intention of Policy 30 is for all developments to make proportional contributions, and consequently, it is not accepted that the policy is intrinsically inequitable. Moreover, it should be recognised that in respect of the delivery of the Southern section of the SWRR via the Holland Park urban extension the full cost of it is being subsidised by Lincolnshire County Council. It is not considered that Policy 30 will encourage piecemeal development since it relates directly to a number of proposed housing allocations aimed at providing a wide choice of high-quality homes through, inter alia, a variety of development opportunities. The reference to a 'link' to the Bourne Road is not contained in either Policy 29 or Policy 30, but, instead, Policy 12: Vernatts Sustainable Urban Extension (Policy 12). The purpose of this link is to allay fears relating to the creation of a large cul-de-sac residential development (in excess of the proposed 1,000 or so dwellings forming Phases 1 and 2 in Policy 12). Notwithstanding the above comments, it is intended to hold discussions with Broadgate Homes Ltd and other interested parties with the intention of exploring and agreeing funding arrangements for the SWRR before the Local Plan examination commences (see response to comments by Broadgate Homes Ltd on Policy 12).

Post Title: 8.3 Vehicle and Cycle Parking

Response Number	264	Respondent Number:	2138	Comment Author:	Andrew Burling	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	31	Map Number:		The policy as drafted will have a negative and restrictive effect on layout, density and viability. For instance it will be impossible to design schemes that have terrace blocks with two and three parking spaces (in curtilage) without making the street scene car dominated.	Policy 31 requires that the Parking Standards and criteria within the policy are met, unless a high quality design can demonstrate that a lower standard of provision delivers the requirements of the policy. It is considered that this provides developers with the scope to design schemes that do not create a car dominated streetscene.		No change to the Local Plan is required.		
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>						
		Consistent with national policy	<input checked="" type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Include a more flexible approach to agreeing parking spaces and standards. Proposals for car parking arrangements should be agreed on a site by site basis taking consideration of location, housing mix and tenure.								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	Discuss why the propose policy does not allow flexibility to allow for different development conditions and use.								

Post Title: 8.3 Vehicle and Cycle Parking

Response Number	521	Respondent Number:	1187	Comment Author:	Spalding and District Civic Society	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		<p>The Plan is unsound here because not justified, as no alternative to the ill-thought-out proposal seems to have been considered.</p> <p>The vague suggestion of a new carpark somewhere to the west of the railway line would be further from the town centre than many (most?) motorists would be prepared to walk, and in any case makes no difference to delays caused by the level-crossing downtimes. May as well be stuck in a car as on foot.</p> <p>Had the Plan proposed to ramp the Steppingstone Footbridge (and thus make it friendly for cycles, wheelchairs and prams), it would have provided a convenient route from the west side of the town to the centre that would have encouraged more people to get out of their cars, as urged by the NPPF and local plans. It might also have deterred SHDC from their recent short-sighted decision to give themselves permission to build houses on the empty land that could have provided space for the ramping of the bridge. An opportunity missed all round.</p>	<p>The Spalding Transport Strategy sets out a high level approach to car parking in the town centre. At present, it considers the provision to be about right although it acknowledges in the longer term demand may outstrip supply. However the potential impacts are not known at this stage because any impacts are closely linked to population growth, car ownership and new sustainable transport measures. The option proposed by the Spalding Transport Strategy is additional parking to the west of the Joint Line, however the Local Plan is clear that this needs to be investigated through a review of the Spalding Transport Strategy, to ensure that the option proposed is appropriate.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p>Do you consider that this part of the Local Plan is</p> <p>Legally Compliant <input 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:	For an alternative solution to more public parking space in Spalding town centre, see our comments on the Draft Public Consultation version at Policy 32.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									