

Post Title: 03: Crowland

Response Number	270	Respondent Number:	909	Comment Author:	Gregory Gray Associates	Client	Wyevale Garden Centres Ltd	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:	3	Gregory Gray Associates are instructed to raise STRONG OBJECTION in respect of the above consultation on behalf of our client, Wyevale Garden Centres Ltd, who have a leasehold interest in Crowland Garden Centre, Postland Road, Crowland. Our client's site is a highly developed brownfield site located on the north-east side of Crowland. The access to the site and the main garden centre buildings lie within the settlement boundary as identified on the South Holland Local Plan 2006 Proposals Map and as shown highlighted on the attached extract (Appendix 1). Within the Publication Version of the South East Lincolnshire Local Plan, the entire site is shown as excluded from the settlement boundary within the countryside. This change has not been anticipated or justified at any point within the Local Plan process as is demonstrated below. My client strongly objects to this revised designation for their site which is unjustified, contrary to national policy and the fundamental tenets of the emerging Plan, thereby rendering the South East Lincolnshire Local Plan unsound. Local Plan Process The site was originally submitted in response to the Council's Call for Sites in 2014 as a suitable development site for inclusion within the South East Lincolnshire Local Plan for residential, employment or other purposes. In support of this proposed allocation was the fact that it comprises a highly developed site accommodating 6,600sq.m of buildings and extensive areas of hardstanding including parking for 100 cars, and its location partially within and immediately adjacent to the settlement boundary providing easy access to the local amenities and transport links offered by Crowland. Whilst it was recognised that the site lies within Flood Zone 3, this designation applies to much of the surrounding land and it was considered that, given the highly developed nature of the site at present, its redevelopment offered the opportunity to achieve a reduced level of built development and impermeable surfacing on the site and secure a scheme that incorporates appropriate flood prevention measures such that it would reduce the risk of flooding on the site and within the immediate locality. This would be demonstrated by a site specific FRA. Further to this submission, the site was indicated as a potential housing site within the draft version of the Local Plan published for consultation purposes in January 2016. At this stage, the Inset Map for Crowland showed the settlement boundary extended to include the entire garden centre site and the site marked as	It is accepted that between the Preferred Sites consultation in July 2016 and the Publication of the Local Plan in April 2017 the settlement boundary for Crowland has been modified. The Housing Papers respond to comments made previously; no comments were made relating to the settlement boundary changing as no comments had been raised in July 2016 requesting such a change. The boundary was modified to provide consistency with other settlement boundaries across the Plan Area where similar types of development have been excluded. The approach taken to settlement boundaries is set out in the Settlement Boundaries Background Paper, January 2016. The purpose of settlement boundaries is to define where particular Local Plan policies apply. In effect, they are defining where the Countryside policy (which covers the majority of the Local Plan area) ends and where other policies relating to Sub-Regional Centres, Main Service Centres, Minor Service Centres and Other Service Centres and Settlements start. Consequently, a settlement boundary is not intended to include all the buildings within the immediate vicinity of the settlement. This means that a settlement boundary does not necessarily include all the dwellings and other developments that may be locally regarded as part of a given settlement. It is appropriate for LPAs to introduce changes at Publication stage and then consult upon them at that time. Although the NPPF does encourage the use of brownfield land, it does not require that such land falls within a settlement boundary. Furthermore other policies, such as Policy 8 in the Local Plan provide for the effective use of brownfield land outside the settlement boundary. The site would fall under 'Other Employment Sites' and proposals for new development or extension of a business would be supported where the proposal involves previously developed land or the conversion/re-use of redundant buildings. It adds that where this is not possible redevelopment may be appropriate subject to several criteria being met. It is considered that this approach supports the future operation of the business and provides opportunities for it to respond to changing market conditions. The settlement boundary is not arbitrary and clearly follows the line of the residential area. It is clear therefore where the sustainable locations are considered to be. This approach is reinforced by the findings of the SA. One strand of Policy 8 is to promote employment allocations for B Class development in the higher tier		No change to the Local Plan is required.		
Site Allocation Number:		Do you consider that this part of the Local Plan is							
Legally Compliant	<input type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input type="checkbox"/>						
		Consistent with national policy	<input checked="" type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate									

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Cro38, a potential housing site. Our letter dated 8th February 2106 confirmed our client's strong support for this allocation. Subsequently, in July 2016, the Preferred Sites for Development Consultation Draft was published. This did not take Crowland Garden Centre forward as a preferred housing site however the entirety of the site was still shown within the settlement boundary (Appendix 2). The Housing Paper published as part of this consultation detailed the comments received in respect of each potential housing site, and referred to the fact that the site lies partially within the existing settlement boundary and would be included within the proposed Crowland settlement boundary. Our letter dated 27th July 2016, requested a re-appraisal of the site within the Sustainability Appraisal however also made specific mention of the fact that the settlement boundary had been extended to include the entirety of our client's site, stating: The revised boundary now includes the full extent of existing development on both the garden centre site and the neighbouring land within the settlement and replaces the previous anomalous boundary which bisected our client's site. The new boundary is logical and defensible and is supported. The SE Lincolnshire Joint Strategic Planning Committee published an officer's response to each comment made in relation to the Preferred Sites Public Consultation including a recommendation as to whether any change should be made to the Local Plan. The Officer's comment set out an evaluation of the garden centre site relative to others within Crowland and recommended Cro038 is not one of the more suitable housing sites in Crowland and it should not be taken forward as a Preferred Option Housing Allocation. The only comment in respect of the settlement boundary was Support for the revised settlement boundary is noted. The Joint Strategic Planning Committee have now published their Publication Version of the emerging Local Plan for consultation purposes. As stated, this indicates the entire garden centre site removed from the settlement boundary and included within the designated countryside. The Housing Paper published in January 2017 and identified as providing the evidence base to support the Local Plan's housing proposals again refers to our previous comments and notes support for the revised settlement boundary. No justification is provided for any change in approach from that adopted previously within the Local Plan process namely, the extension of the settlement boundary to include all of the garden centre site. Comments in relation to Soundness of Publication Version of Local Plan In accordance with para. 182 of the NPPF, Local Planning

settlements including Crowland. However the consented use of the site is not B Class development as it is a garden centre. Another strand of Policy 8 is to support businesses outside the settlement boundaries (i.e. Within the countryside) as the Local Plan recognises them as being an important part of the local economy whether they are some distance from a settlement or nearby. It should be noted that this site is within Flood Zone 3a, flood hazard in 2115 'danger for all', and flood depth in 2115 '1-2m' one of the least sequentially preferable sites in terms of flood risk in Crowland. By not selecting this site for development the Local Plan is fully compliant with the NPPF and paragraph 99 which requires Local Plans to 'take account of climate change over the longer term, including factors such as flood risk... New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change'. The purpose of the Local Plan is to ensure that new development does not increase the risk of flooding elsewhere, it is not to decrease the vulnerability of existing sites from flooding by promoting development that is not as sustainable as reasonable alternatives.

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Authorities are required to submit plans for examination which are sound by virtue of their being positively prepared, justified, effective and consistent with national policy. In this instance, our clients consider that the proposed revision to the settlement boundary of Crowland, to exclude the entirety of our client's site renders the Plan unsound on the grounds that it is not justified or consistent with national policy. In order to be justified, the plan must provide the most appropriate strategy when considered against reasonable alternatives and based on proportionate evidence. As detailed above, the Joint Strategic Planning Committee has gone through an extensive process of public consultation in connection with the emerging Local Plan and yet this final change in settlement boundary did not form part of any of this consultation process and is not justified at any point within the recently published documents. Furthermore, the inclusion of this previously developed site within the countryside is contrary to the principles set out in the National Planning Policy Framework (NPPF). It is one of the core planning principles set out in para. 17 of the NPPF and reiterated in para. 111 that planning policies should encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value. In the Joint Planning Committee's published Housing Papers dated July 2016 and January 2017, the brownfield nature of my client's site is recognised, together with the positive opportunity that it offers to provide new development with limited environmental impact. No justification is provided as to the sudden change to the settlement boundary included in the Publication Version of the Local Plan to exclude the entirety of our client's site. It is anomalous for the Council to revise the settlement boundary to include a highly developed brownfield site within the designated countryside wherein a strict policy of restraint applies. The garden centre site is of an urban character, completely at odds with that of the open land to the east and north. The inclusion of the site within the countryside means that a more restrictive policy regime than current applies, would be applicable to the garden centre site, which is not consistent with the NPPF's requirement that effective use of such land should be encouraged. It also conflicts with both the spatial strategy and proposed policies within the emerging Local Plan. Specifically, the spatial strategy of the plan recognises that the ability of a location to sustain local businesses is an important factor to ensure that housing and employment growth are closely linked and indeed

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the potential loss of a local employer was viewed as a negative factor within the Sustainability Appraisal of the garden centre as a potential housing site. The removal of all of the site from the settlement boundary such that countryside policies of restraint would apply, jeopardises the viability of the existing business and its ability to respond to changing market conditions. Furthermore, the definition of settlement boundaries is intended to provide a degree of certainty as to where the most sustainable locations for new development are. This arbitrary realignment of the boundary without any reference to the site's existing designation or character undermines this intention. Finally, the economic policies of the emerging Local Plan aim to focus economic growth in the higher-tier settlements including the Main Service Centres such as Crowland. Policy 8 indicates that the South East Lincolnshire authorities will, in principle, support proposals which assist in the delivery of economic prosperity and job growth in the area. In relation to existing businesses outside the allocated employment sites, extensions will be supported provided that the proposal involves the re-use of previously-developed land or the conversion/re-use of redundant buildings. Further development of Crowland GC would be entirely consistent with these objectives since it comprises an established local business, providing local employment, on a well located and previously developed site. Furthermore, our client's site currently offers opportunities to provide new sustainable development without increasing the vulnerability of the surrounding development to flooding, given that the high level of existing built form and impermeable hardstanding offers opportunities for net gains as part of any approved scheme. Failure to take such opportunities conflicts with the intentions of para. 99 of the Framework. The proposed amendment to the settlement boundary has not been justified at any stage of the Local Plan process and is contrary to national policy since it fails to encourage the effective use of a brownfield site or to plan for development which can assist in decreasing the vulnerability of adjacent sites to the impacts of flooding. As such it renders the Publication Version of the South East Lincolnshire Local Plan unsound. The existing settlement boundary as shown on the South Holland Local Plan 2006, does not reflect existing development on the site since a retail canopy on the northern side of the building, a covered walkway and the plant display area are all located beyond the settlement boundary. There is no change in character between this area and the land to the south which is currently included within the

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settlement. Accordingly, it is requested that the settlement boundary be revised to include all of the garden centre site within the settlement of Crowland. This proposed amendment was incorporated within all public consultation versions of the emerging Local Plan and has not be subject to any objections. However, as a minimum, the existing settlement boundary as shown in the South Holland Local Plan should be carried forward. Failure to do so, without any public consultation on the matter, renders the existing plan unjustified, contrary to national policy, inconsistent with the tenets of the emerging Local Plan and fundamentally unsound. I would be grateful if you could ensure that the Inspector receives a copy of this representation and, subject to the Joint Planning Committee's response in this matter, we reserve the right to appear at the Examination to make representations on this ground.

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Response Number: 386 Respondent Number: 859 Comment Author: Woods Hardwick Planning Ltd Client: Wheatley Homes Web Link:

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

Policy Number: 11 Map Number: 3 Site Allocation Number: No change to the Local Plan is required.

Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:	
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input 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 submitted that the site should be considered as being suitable for development and subsequently allocated within the development plan for residential development.

Participate in Examination:

Why wish to participate: We wish to participate to add to the important debate surrounding the allocation of new sites for development.

Policy 11 sets out the housing growth to be directed to each settlement, according to its place in the settlement hierarchy. A minimum of 500 dwellings is to be directed to Crowland, reflecting its position as a sustainable location for significant growth. Table 3 sets out the new sites proposed for allocation to assist in meeting the requirements of the development plan. For Crowland, a total of 6 sites are identified which will deliver a total of 205 dwellings. The Housing Paper for Crowland, which supports the Plan states that a total of 74 have been built and there is outstanding consent for a further 119. This gives a total of 398 dwellings committed, leaving a residual requirement of 102 dwellings to be found. There is no firm commitment or evidence published to show how the plan will deliver the 500 dwellings identified. This does not constitute positive planning to achieve the required delivery of housing. It is therefore submitted that further land should be allocated within the Plan for it to be determined as a sound and effective plan. It is submitted that Site Cro 014 Land to the West of Harvester Way should be included as a site allocation in Table 3 and shown on the Proposals Map for Crowland. The site can deliver up to 100 new dwellings. The site has not been proposed for allocation, with the reasoning set out within the Strategic Housing Land Availability Assessment (SHLAA) and the Crowland Housing Paper. There are two main issues raised as to why the site is not suitable as an allocation, namely noise and flood risk. The site has been subject to a planning application for up to 100 dwellings, demonstrating the commitment of the landowner to bring the site forward for development. The application was accompanied by a comprehensive set of supporting documents and the application was recommended for approval by officers. The application was refused by the committee and this decision is being appealed to the Secretary of State as it is submitted that the decision to incorrect and the proposal accords with the relevant planning considerations. The recommendation of officers to approve the application (on two separate occasions, following a deferment of the application for further consideration of noise) followed full consultation with the Council's Environmental Health Officer, who raised no objection to the Noise Assessment submitted. Further, the Environment Agency raised no objections to the Flood Risk Assessment submitted which was also supported by subsequent modelling work that was undertaken. The application was considered acceptable

The Crowland Housing Paper, January 2017 identifies the six housing allocations and identifies the capacity of each site, at 20 dwellings to the hectare. However in practice some sites are likely to accommodate a higher density. This shows that the allocations, completions and commitments could provide for at least 398 dwellings. This means that there is a difference of 102 dwellings. Since January 2017 a further 52 dwellings have been approved leaving a gap of 50 dwellings. But, the housing target is not expected to be delivered through allocations only, there are a number of smaller sites in Crowland that the SHLAA identifies as developable and within the settlement boundary that have not been allocated because they are too small (sites of 10 and less) which would contribute to the housing target. However, Crowland is a settlement at high flood risk: Cro014 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all' and flood depth in 2115 is classified as 1-2m, one of the least sequentially preferable sites in terms of flood risk in Crowland. The Environment Agency identifies that 'the National Planning Policy Framework (para 101) says that the aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding but because large areas of South east Lincolnshire are at the same probability of flooding (i.e. Land having a 1 in 100 annual probability of river flooding or a 1 in 20 annual probability of sea (tidal) flooding more refined information has been used for the Sequential Test from the SFRA maps (i.e. The hazard maps) which show not only the probability of flooding but also the consequences of flooding to decide which sites are sequentially preferable. Although the submission of a Flood Risk Assessment may help satisfy the Exception Test, the Exception Test cannot be applied until the Sequential test is passed - and the SFRA 2017 identifies that for Cro014 the Sequential Test has not been passed.' The SFRA identifies that there are other sites that are more sequentially preferable and developable. Cro014 lies in close proximity to employment land. In terms of Local Plan site selection the intention is to identify the most sustainable sites following consideration of a range of issues. SHDC Environmental Health considers that there is no certainty that the amenity of future residents would not be adversely affected should Cro014 be developed. This is an issue which does not affect the other allocations and so it has not been identified. The planning

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in this regard and this not form any part of the reason for refusal formulated by the Planning Committee. The professional officers at the Council and external bodies deemed that the application was acceptable and accorded with all relevant planning considerations.

application and appeal processes are separate to the Local Plan; no decision has been reached on the appeal so it is not possible to determine whether the applicants views are sound.

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Response Number	426	Respondent Number:	2028	Comment Author:	Barton Willmore	Client	Abbey Developments Limited	Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:		Map Number:	3	Abbey own and control Land West of Clout Drove and North of Foreman Way, Crowland (identified by the South East Lincolnshire Joint Strategic Planning Committee (JSPC) as Cro045). The site is promoted for residential development including the provision of affordable housing. Abbey has sought pre-application advice from South Holland District Council (SHDC) with regard to the preparation and submission of a full planning application. Abbey has commissioned a range of technical assessments and surveys to support a planning application for the site and a detailed layout has been produced. This work was undertaken in the context of a preferred allocation for housing which was included at earlier stages of the Local Plan process. Further to the previously submitted representations made by Barton Willmore LLP on behalf of Abbey, we object to the revised development strategy for Crowland in South Holland District. Abbey note that previously proposed allocation of Land West of Clout Drove, Crowland (site ref: Cro045) has been deleted from the Local Plan. This is despite a significant increase in the overall housing allocation to Crowland as a Main Service Centre. Our objections focus upon this significant change in the strategy including the newly proposed allocation of Land to the East of Normanton Road and Jubilee Way (Cro050). The strategy as proposed to be submitted is fundamentally flawed as it is not legally compliant or Sound, as set out below. We object to the Local Plan strategy for development at Crowland and the proposed allocation of Land to the East of Normanton Road and Jubilee Way (Cro050). The Cro050 site option has not previously been identified by the JSPC at earlier Regulation 18 stages of consultation as a preferred site. It was not previously considered through the preferred options consultations held in January-February 2016 and July-August 2016. This site's introduction comes at the advanced Regulation 19 stage of the Local Plan's preparation. Such an approach is potentially legally flawed and is a procedural flaw which represents a significant risk to the process. Furthermore, the JSPC's assessment of the Cro050 site is not robust and there are significant inconsistencies when compared to the scoring of our client's site West of Clout Drove. In particular, the conclusions set out within the sustainability appraisal relating to accessibility, landscape and visual impact, the application of the flood risk sequential approach and the contribution to be made to housing delivery. By	Cro050 (as part of Cro031) was previously identified as a Potential Housing Site in the January 2016 consultation. Cro031 was discounted at that stage. Following receipt of the SFRA, 2017 the Preferred Sites were re-assessed for their suitability for housing. The SHLAA and Housing Papers have been clear that site selection could be changed once the results of the SFRA were known. The SFRA identifies that Cro045 and Cro031 are both within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all' and flood depth in 2115 is classified as '1-2m'. However, Cro050 is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most' and flood depth in 2115 is classified as '0.5-1m' so is more sequentially preferable in flood risk terms. National policy requires that the sequential approach to site selection is used which is considered important in Crowland, a settlement at high risk of flooding. It is common for additional sites to be introduced at Publication stage, particularly when the evidence base justifies the approach. The SA does provide a clear basis to compare sites, but is one part of the evidence base Officers use when selecting sites for development. Cro050 has one more positive impact for landscape character than Cro045 (because Cro045 protrudes into an area with countryside character generating a visual impact), but does have 2 more negatives relating to distance from facilities and shops although this is partly due to the existing built form of Crowland and the site's relationship to the built area. Through a well-designed scheme these impacts could be mitigated. The SA scores Cro045 as negative for flood risk and Cro050 as depending on design and implementation which as discussed above means that Cro050 is at a lower flood risk, and is not considered to be at a broadly comparable level of risk with Cro045. This is supported by the Sequential Test for Allocations Report which accompanies the Local Plan and is based upon the SFRA 2017. The Crowland Housing Papers provide a comprehensive analysis of the site selection process including justification for the strategy taken for Crowland. It is the role of the SHLAA to provide information on the range of sites which are available to meet need, but it is for the Local Plan to determine which of those sites are most suitable to meet those needs. The Local Plan is currently in year 7 therefore years 1-5 are in the past so no housing figures will be identified. The Crowland Housing Paper 2017 shows that 274 dwellings are likely to be delivered in years 6-
Site Allocation Number:	Cro045				

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

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

For the reasons set out above, we seek modifications to the published Regulation 19 Publication Version of the South East Lincolnshire Local Plan. These modifications are limited to: 1. The deletion of site Cro050. The inclusion of this site is both legally flawed and unsound for the reasons set out above. 2. The reinstatement of site Cro045 as a proposed allocation for new housing development. The site has been previously supported by the JSPC and the evidence base published alongside the Local Plan does not support its deletion.

Participate in Examination:

Why wish to participate:

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contrast, Land West of Clout Drove, Crowland (Cro045) was consistently supported by the JSPC at earlier stages of the process. In particular, we note that the site was included as a preferred allocation in the July/August 2016 preferred sites consultation. The supporting evidence base clearly supported its inclusion. The sustainability appraisal (SA) does not present a clear comparative assessment of the sites proposed for allocation against the reasonable alternatives. The JSPC appears to rely upon other sites being sequentially preferable in flood risk terms to Cro045. This approach is not supported by the JSPC's own evidence base and the inclusion of sites proposed for allocation which are subject to broadly equal level of flood risk. The SA does not provide any clarity to justify the significant change in the strategy for Crowland, namely the replacement of site Cro045 (previously supported) with Cro050 (not previously considered and rejected as part of site Cro031). There is no clear paper trail provided to evidence the revised strategy. In our view, this critical shift in approach undermines the Local Plan's ability to successfully pass the Examination-in-Public. The SHLAA Published alongside the Regulation 19 Publication Version of the Local Plan confirms that the site is considered by the JSPC to be suitable, available and achievable. We broadly agree with this assessment. However, the SHLAA states that the delivery of housing may be delayed, with commencement assumed" in year 9. On behalf of Abbey, we confirm its commitment to progress a planning application seeking full planning permission for the development for housing) of Cro045 should the site's allocation be reinstated. A planning application is close to being completed and could be submitted within the next few months. Subject to securing planning permission, Abbey anticipates that the site could contribute towards the supply of housing in the next five years. Having regard to the serious shortfall in SHDC's current five year supply as discussed below, this is an important consideration which should be afforded significant weight supporting the allocation of Cro045. SHDC's latest assessment of the five year housing land supply states that it can only demonstrate a 3.25 years supply. This equates to a shortfall of 1,121 homes over this period. Having regard to the significant and persistent under-delivery of housing and, in our view, highly optimistic assumptions made by SHDC regarding the delivery of housing from the strategic allocations at Vernatts and Holbeach, it will be important for deliverable sites to address the urgent need for housing in the area. Furthermore, it is noted that the SHLAA concludes that the proposed allocations

10 (the next five years of the plan) which will contribute towards the Council's five year housing land supply. However, the five year supply is assessed by Local Authority area and the Local Plan identifies that South Holland has a five year supply.

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at Crowland are not deliverable within the first five years of the plan period. As such, it is understood that these sites will make no contribution to resolving the serious shortfall by contrast to our client's site.

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Response Number: 442 Respondent Number: 936 Comment Author: IBA Planning Ltd Client: Mrs T Hunter-Shaw Web Link:

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

Policy Number: Map Number: 3 Site Allocation Number: Cro012

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

Sufficient housing sites should be allocated (and listed in the appropriate table and shown on inset map No. 3) to meet the identified minimum residual housing requirements for Crowland over the Plan period. My client remains of the view that there are better housing sites, including hers, available in Crowland than those identified in the latest Consultation Draft and that site reference Cro012 (as a logical extension of the built-up area - and site reference Cro043 in particular) Should be included as a housing site instead of, or in addition to, those already identified to address the current shortfall in housing allocations and to meet the identified minimum residual housing requirements for Crowland.

The Inspector may find it helpful to ask questions/clarification regarding this site (and on those matters which have be used by the Council to discount it at the outset) and how it, and others, can be delivered together to achieve the identified residual housing requirements (and acknowledged highway improvements) for Crowland and address the current under-provision.

Cro012: The Housing Paper Confirms a residual housing requirement for the Plan period of 307 dwellings (para. 3.3) having first deducted existing commitments from the minimum target of 500 dwellings set by Policy 11. However, the six housing allocations for Crowland identified in the table on page 42 of the draft Plan (under explanatory paragraph 5.2.9) cumulatively equate to only 205 dwellings. The above amounts to under-provision of approximately one third of the minimum housing requirement for Crowland and this is considered to be unsatisfactory (given the Council's longstanding difficulties with housing delivery to date) and wholly unnecessary (when there are additional, perfectly suitable, sites being promoted by others which would make up that shortfall- and which have been the subject of good early interest from local housebuilders.) To under-provide at the outset is hardly tantamount to being positively prepared and the draft Plan, in terms of its objectives for Crowland, is doomed to fall short from the outset. To remedy the above, sufficient housing sites should be allocated (and listed in the appropriate table and shown on Inset map No. 3) to meet the identified minimum residual housing requirements for Crowland over the Plan period. If any of the allocated sites yield more housing numbers than first anticipated, then there is clearly scope and flexibility within the Plan to accommodate this (see footnote 2). Second, the Authority's response to my client's previous objections (set out in the Housing Paper for Crowland) is helpful, but provides little comfort that the correct approach has been adopted. My client remains of the view that there are better housing sites, including hers, available in Crowland than those identified in the latest Consultation Draft and that site reference Cro012 (as a logical extension of the built-up area - and site reference Cro043 in particular) should be included as a housing site instead of, or in addition to, those already identified to address the current shortfall in housing allocations and to meet the identified minimum residual housing requirements for Crowland. The reasons why site reference Cro012 has thus far not been selected are not accepted. The Housing Paper points to a recent refusal of planning permission on the site as justification for not identifying the site as a housing allocation. However, the refusal notice confirms the absence of any objection in principle (to the development of housing on the site) and focuses on just 3 technical reasons - heritage, flooding and highways. The heritage and flooding

The Crowland Housing Paper 2017 shows that there is a difference of 102 dwellings once completions, commitments and the allocations have been taken into account. However, the capacity of the allocations assumes a density of 20 dwellings to the hectare. In practice, some sites are likely to accomodate a higher density. Additionally 52 dwellings have since been granted planning permission reducing the requirement to 50. The housing target is not expected to be delivered through allocations only, there are a number of smaller sites in Crowland that the SHLAA identifies as developable and within the settlement boundary that have not been allocated because they are too small (sites of 10 and less) which would contribute to the housing target. Cro012 was discounted partly because the SHLAA identified the site as being undevelopable. Furthermore, a planning application for residential use has been refused because of significant highways and environmental health concerns relating to proximity to an employment allocation. These are issues that do not apply to the allocations. A refusal of a planning application also indicates the site is not suitable or deliverable as evidenced by the SHLAA.

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reasons cited were owing to the need for more information rather than comprising matters that could not be addressed. Indeed, the same proposal has since been resubmitted for further consideration and is supported by additional information to resolve those 3 outstanding technical matters. To address the heritage reason, the resubmission is now supported by a Heritage impact Assessment which concludes the proposed development is unlikely to have any harmful impact on any below-ground archaeology and it will not harm the setting or overall significance of any of the listed buildings within the vicinity of the site and will preserve the character and appearance of the Crowland Conservation Area. Any further investigatory archaeological work, if necessary, could be secured by (precommencement) condition or, as with the other proposed housing allocations, as a postallocation policy requirement. Additional Breach Analysis work has also been provided as part of an updated FRA to address the previous concerns of the Environment Agency. Recent discussions with the Environment Agency indicate that, subject to further clarification, it now looks likely that a satisfactory Solution can be reached. In terms of the highways reason for refusal, the resubmission acknowledges, as before, the inadequacy of the existing highway, but included provisions for its upgrade (all achievable within the control of my client's land/highway authority land). A separate application by others has also since been submitted for consideration at the same time (as our client's). This application promotes the same highway improvements to Crease Drove (which the local Highway Authority acknowledges will provide highway benefits beyond the developments themselves - i.e. To the existing free flow of traffic already using Crease Drove) - and both applicants have committed, as part of their respective proposals, to funding and sharing the costs of the highway improvement works proportionately to ensure delivery. The two sites combined would deliver approximately 140 dwellings - and clearly address/resolve the current housing shortfall identified above. Noise issues (arising from the original SHLAA conclusions) are alleged, but as with matters of principle and visual amenity, are tellingly absent from the reasons set out on the previous refusal notice. Indeed, the Noise Impact Assessment submitted alongside the aforementioned original application/resubmission (relating to Cro012) reports no such concerns to justify withholding planning permission on this matter. The above reaffirms the site's suitability as a housing site and should therefore have been included within the current Publication Version

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(and indeed previous versions) to allow further consultation. My client notes the Authority's explanation (throughout the Housing Papers) that the Local Plan process is iterative and that it is not unusual for updated information to be introduced at each Stage. In the above circumstances, it is hoped that the additional information offered above will warrant the Authority reconsidering (and re-consulting) on the merits of my client's land, and neighbouring land as a way of meeting the current shortcomings of the draft/housing allocations, before finalising their documents for submission to the Secretary of State. In summary, my client wishes to maintain her objection to the draft South East Local Plan as presently worded and remains of the view that it has not been positively prepared, nor will be effective.

Response Number	485	Respondent Number:	2685	Comment Author:	Savills (UK) Ltd	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content		Officer Comment:		Officer Recommendation:	
Policy Number:		Map Number:	3	Our client, is the freehold owner of site Cro050. We can confirm that the site is available for development, with access being achievable from Normanton Road. We therefore support the proposed allocation of the site.	Confirmation of the availability of Cro050 is welcomed.		No change to the Local Plan is required.		
Site Allocation Number:	Cro050								
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: 04: Donington

Response Number: 385 **Respondent Number:** 2821 **Comment Author:** Amec Foster Wheeler **Client:** Duchy of Lancaster **Web Link:**

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

Policy Number: **Map Number:** 4 **Site Allocation Number:** re: Park Farm (2006 employment land allocation) Inset Map 4 shows the Park Farm site as being outside of the settlement boundary. As indicated above, planning permission has been granted on part of the site. As such, it is considered that the previous allocation should be included within the settlement boundary, or as a very minimum, the approved application site should be included. Amec Foster Wheeler objects to the exclusion of the site from within the settlement boundary

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

It is entirely appropriate for the boundary to be amended to include the site due to its previous allocation and recent consent for employment development.

re: Park Farm (2006 employment land allocation) Inset Map 4 shows the Park Farm site as being outside of the settlement boundary. As indicated above, planning permission has been granted on part of the site. As such, it is considered that the previous allocation should be included within the settlement boundary, or as a very minimum, the approved application site should be included. Amec Foster Wheeler objects to the exclusion of the site from within the settlement boundary

The Employment Land Technical Paper Update 2017 (which updates the Employment Land Review) identifies that 'the NPPF states that local authorities should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The ELTP informed by the SELAA identifies several allocations with significant barriers that would constrain future delivery of viable economic development and/or would not meet the needs of the Plan Area's growth sectors.' The Main Employment Area designation in Policy 8 promotes those sites that are best able to meet the needs of the Plan Area's growth sectors and the general employment market. Consequently the Park Farm site was de-allocated because the SELAA identifies that 'the site has proved unattractive to the general employment market (the planning permission is outline and is for the re-location of an existing business rather than being attractive to new business) so it is not considered that demand exists for a strategic employment allocation in this location. The outline permission is only for part of the site rather than its entirety indicating that demand may not exist for employment use on the scale of that currently allocated'. However, the site and any future development would be covered by Policy 8 'Other Employment Sites' which supports the re-use of previously developed land and the conversion of other buildings to employment use, including the agricultural related buildings on site. Additionally it supports the development of employment use subject to several criteria being met which should help fulfill the future aspirations for the site. The Settlement Boundaries Background Paper 2016 identifies that the purpose of settlement boundaries is to define where particular Local Plan policies apply. In effect, they are defining where the Countryside policy (which covers most of the Local Plan area) ends and where other policies relating to the Sub Regional Centres, Main Service Centres and Minor Service Centres start. Consequently a settlement boundary is not intended to include all buildings within the vicinity of a settlement. In many cases the boundary is defined by a strong physical feature on the ground, in this case the A52. Therefore it is appropriate that the site remains outside the settlement boundary.

No change to the Local Plan is required.

Post Title: 05: Holbeach

Response Number: 390 Respondent Number: 2060 Comment Author: Robert Doughty Consultancy Ltd Client: Lincolnshire County Council Web Link:

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

Policy Number: Map Number: 5 Site Allocation Number: We support the way that HOB048 is represented on inset Map 5. This site forms a sustainable development to Holbeach confined by the A17, A151 and Spalding Road. The site will have a limited impact on the wider setting of Holbeach, and, although capable of being delivered in isolation, will tie in well with the Holbeach Food Enterprise Zone and the ongoing Peppermint Junction improvement scheme. The Inset Map presents a sensible pattern of growth for Holbeach. The designated sites will deliver the planned growth for the settlement and are, collectively and individually, the most appropriate sites within or adjacent to the town. Support for Hob048 noted and welcomed. 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

To support any debate regarding the delivery of site Hob048 and the wider development of Holbeach as part of the wider Growth Strategy.

Post Title: 05: Holbeach

Response Number: 396 **Respondent Number:** 2060 **Comment Author:** Robert Doughty Consultancy Ltd **Client:** Mr R H Goodley and Mr A M Goodley **Web Link:**

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

Policy Number: **Map Number:** We support the way that HOB048 is represented on inset Map 5. This site forms a sustainable development to Holbeach confined by the A17, A151 and Spalding Road. The site will have a limited impact on the wider setting of Holbeach, and, although capable of being delivered in isolation, will tie in well with the Holbeach Food Enterprise Zone and the ongoing Peppermint Junction improvement scheme. The Inset Map presents a sensible pattern of growth for Holbeach. The designated sites will deliver the planned growth for the settlement and are, collectively and individually, the most appropriate sites within or adjacent to the town. **Support for Hob048 noted and welcomed.** **No change to the Local Plan is required.**

Do you consider that this part of the Local Plan is

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

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

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

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

To support any debate regarding the delivery of site Hob048 and the wider development of Holbeach as part of the wider Growth Strategy.

Post Title: 05: Holbeach

Response Number: 409 Respondent Number: 2060 Comment Author: Robert Doughty Consultancy Ltd Client: Bovis Homes Limited Web Link:

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

Policy Number: Map Number: 5 We support the way that HOB048 is represented on inset Map 5. This site forms a sustainable development to Holbeach confined by the A17, A151 and Spalding Road. The site will have a limited impact on the wider setting of Holbeach, and, although capable of being delivered in isolation, will tie in well with the Holbeach Food Enterprise Zone and the ongoing Peppermint Junction improvement scheme. The Inset Map presents a sensible pattern of growth for Holbeach. The designated sites will deliver the planned growth for the settlement and are, collectively and individually, the most appropriate sites within or adjacent to the town. Support for Hob048 noted and welcomed. No change to the Local Plan is required.

Site Allocation Number:

Do you consider that this part of the Local Plan is

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

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

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

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

To support any debate regarding the delivery of site Hob048 and the wider development of Holbeach as part of the wider Growth Strategy.

Post Title: 05: Holbeach

Response Number: 509 Respondent Number: 2342 Comment Author: Ashley King Developments Client: Web Link:

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

Policy Number: Map Number: 5 Support for Hob004 and Hob009 is noted. No change to the Local Plan is required.

Site Allocation Number:

Do you consider that this part of the Local Plan is

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

Legally Compliant

Positively Prepared

Sound

Justified

Prepared in accordance with Duty to Cooperate

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

Because we represent the land owner and developer, and would wish to take part in any discussion of the site at the Examination.

Hob004 and Hob009:
 We support the proposed allocation of this land. The site identified as Hob004 on the draft Proposals Map is in fact several different sites on the Council's Strategic housing Land Availability Assessment 2017 (SHLAA), and Hob004 appears to have been adopted as a shorthand. The part of the site relating to Hob004, as identified by the SHLAA, is subject to a planning application (H09-0288-15), which South Holland Council have resolved to approve, subject to the completion of a s106 agreement. It has therefore already been judged as being a suitable location for development, and the Council have concluded that there are no unacceptable adverse impacts arising from the proposed development of 36 dwellings. We expect this planning permission to be issued prior to the adoption of the Local Plan.
 We note that the SHLAA concludes that the site as a whole is available, achievable and suitable for development, and we agree with this assessment. We would add the following observations:
 A suitable highway access can be constructed from Balmoral Way, whilst construction traffic would reach the site through Foxes Low Lane.
 Surface water would be accommodated within the site using SuDS techniques.
 The site can accommodate the 109 dwellings indicate in Table 3 of the draft Local Plan, and a higher density of development may be deliverable, whilst complying with all of the Council's policies, such as providing suitable areas of public open space, generous private garden areas, and a high quality public realm.
 The site is entirely developable and deliverable, and it is backed by Ashwood Homes, a local house builder. In addition, we note that the SHLAA 2017 concluded that the site is a suitable location for development, and that:
 It will not have adverse impacts on natural, built or heritage assets.
 It will not lead to the loss of, or place unacceptable burdens on, existing infrastructure.
 It is accessible to the town's existing services and facilities.
 Services and facilities are also accessible by foot, bicycle and public transport.
 The site lies partly within Flood Zone 3a, but this is also true of several of the potential housing sites identified around Holbeach. The Council have already concluded

Post Title: 05: Holbeach

that the wider applicability of this flood zone to potential housing sites in the area, and the need for residential development, mean that this site passes the flood risk sequential test, and so is suitable for development.

Post Title: 05: Holbeach

Response Number	510	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:		Map Number:	5			
Site Allocation Number:						

Do you consider that this part of the Local Plan is

Legally Compliant

Sound

Prepared in accordance with Duty to Cooperate

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

Positively Prepared

Justified

Effective

Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

We believe that Sites Hob045 and Hob052 should be identified by the Local Plan as a housing allocation.

Participate in Examination:

Why wish to participate

Because we represent the land owner and developer, and would wish to take part in any discussion of the site at the Examination.

Hob045 and Hob052: This site has not been identified in the draft Local Plan as a Potential Housing Site, but we believe that it is an entirely suitable location for new residential development of around 175 dwellings, and that it should be identified as a housing allocation. The Councils have concluded, in their SHLAA 2017, that these sites are both 'available' and 'achievable', but that they are not 'suitable' for development. The sole reason given in the SHLAA is that Hob045 contains some tall mature trees, which are protected by Tree Preservation Orders, and Officers have anticipated that the site's development would require these to be removed in order for a residential development to be accommodated. This is simply not the case, as a residential development can be designed in a way which would allow for the retention of these trees, with appropriate buffers of open space and the retention of other landscape features. The SHLAA concludes that Hob052 could not be developed in isolation of Hob045. A planning application (H09-0332-16) has been submitted for a residential development of 188 dwellings on Hob045. This is recommended for approval by Officers, and is due to be considered by the Council's Planning Committee shortly. The proposed layout has been discussed extensively with development management Officers over the course of a year, and it has now been agreed that there are no material considerations which would restrict the grant of planning permission. This application is made in light of the current shortfall in the supply of housing land within South Holland District, which renders policies for the supply of housing out of date, by virtue of NPPF, paragraph 49. The SHLAA 2017 estimates that these sites would together accommodate around 263 dwellings if it were to be developed at a density of 20 dwellings per hectare. Studio 11 Architecture, working on behalf of Ashley King Developments, have prepared a layout for a residential development on this site which would provide 188 dwellings, implying that it would be of a far lower density, of around 14 dwellings per hectare. This low density development would allow for the retention of the protected trees, and also large open spaces within the site. It would maintain important elements of the site's current character, and create a new residential development of distinction. The character of the proposed development on this site would be different to many other housing sites, due to

The SHLAA classifies site Hob045 as being undevelopable because it is 'well treed to the boundaries and there are also groups of trees within the site, subject to a tree preservation order ... the site has a parkland character and its development would potentially involve the loss of some mature trees. This is because they are tall and dwellings would have to be located well away from the trees to be beyond their falling distance. Their removal would change the appearance of the site especially those which are on the boundaries of the site.' Additionally, the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for most', and flood depth in 2115 is classified as '0.5-1.0m' one of the least sequentially preferable in Holbeach. Consequently, the site was not put forward as a Preferred Housing Site in the July 2016 consultation. As planning permission has not been granted for the site the above objection does not raise any issues that suggest that the previous approach taken to this site was inappropriate. It is therefore considered that site Hob045 should not be taken forward as a 'Housing Allocation'

The SHLAA classifies site Hob052 as being undevelopable because it adjoins another site to the west which has been discounted owing to the preserved trees on site. The development of the site on its own would add to the existing group of dwellings to the east and alter the rural character of the location.' The SHLAA adds 'Branches Lane would require widening, strengthening, surface water drainage, footways and street lighting to make it suitable to serve the site.' These issues do not affect other sites to the same extent. It is therefore considered that site Hob052 should not be taken forward as a 'Housing Allocation'

No change to the Local Plan is required.

its low density and mature landscape. It would therefore be a suitable location for the provision of a range of housing, including family housing with generous gardens, and executive housing. This latter form of housing is something which is generally in short supply within the area, but which is required, and would be complementary to wider aspirations to diversify the local economy and bring in more highly skilled and professional jobs. This is to be facilitated by the provision of Prestige Employment Sites, such as Lincs Gateway at Spalding, as well as a broadening of the knowledge-based employment cluster, with the development of the food Enterprise Zone in Holbeach. However, it is necessary to improve the range of housing available to people who may work on these sites, and this a typical housing site is an opportunity which should be embraced.

With regard to the site's delivery, we note the following:

A suitable highway access can be constructed from Dam Gate.

Surface water would be accommodated within the site using SuDS techniques.

The site can accommodate around 188 dwellings, whilst complying with all of the Council's policies, such as providing suitable areas of public open space, generous private garden areas, a very high quality public realm, and the retention of protected trees and other important landscape features.

The site is entirely developable and deliverable.

In addition, we note that the SHLAA 2017 concluded the following with regard to residential development on these sites:

It will not have adverse impacts on built or historic assets.

It will not lead to the loss of, or place unacceptable burdens on, existing infrastructure.

It is accessible to the town's existing services and facilities.

Services and facilities are also accessible by foot, bicycle and public transport.

The site lies within Flood Zone 3a, but this is also true of several of the potential housing sites identified around Holbeach. The Council have already concluded that the wider applicability of this flood zone to potential housing sites in the area, and the need for residential development, mean that this site passes the flood risk sequential test, and so is suitable for development.

Post Title: 06: Kirton

Response Number	464	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:		Map Number:	6	<p>Kirton is a settlement with a wide range of facilities and with the inclusion of parts of Frampton Parish, the plan, under Policy 11, directs 500 dwellings to the settlement because of its "Main Service Centre" status. This scale of growth is supported by Broadgate and this scale of growth recognises the sustainable credentials and existing level of service and employment provision at the settlement.</p> <p>The site which Broadgate control adjoins urban land uses and sits in a well foliated setting, particularly to the north and east. The site would be capable of providing 130 dwellings in a range of dwelling types as well as contributing to affordable housing.</p> <p>The site is not constrained and can be suitably accessed to connect with the A16 and is therefore readily deliverable. The site is surrounded on two sides by other allocations and Broadgate request that the site is also allocated for housing led development to accelerate delivery at this sustainable location which will provide choice to the market and with Broadgate's track record of delivery, will ensure this allocation is converted to firm housing completions. With the larger allocated sites at Boston and Spalding requiring major infrastructure and access to Government pump funding (should it be available) the site offers certainty of ongoing development in a sustainable location. [plan provided by email]</p>	<p>The support for Policy 11's provisions for Kirton is welcomed.</p> <p>The South East Lincolnshire Strategic Housing Land Availability Assessment (April 2017) (SHLAA) gives this site the reference Kir012. The SHLAA classifies site Kir012 as being undevelopable, because because: it is adjacent to existing and allocated industrial uses which may impact upon the amenities that would be enjoyed by new dwellings on the site; and the site has a countryside character and a poor relationship to the village's built form, and its development would have adverse impacts upon the character and appearance of the area. Consequently it was not put forward as a 'Potential Housing Site' in the January 2016 consultation, nor as a 'Preferred Housing Site' in the July 2016 consultation. Notwithstanding that the site is promoted by a housebuilder, this objection does not raise any issues that suggest that the previous approach taken to this site was inappropriate.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:		<p><i>Do you consider that this part of the Local Plan is</i></p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Soun <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input 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.								

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation March 2017

Post Title: 07: Long Sutton

Response Number	235	Respondent Number:	2081	Comment Author:	Mr S Walton	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	I can confirm our support for inclusion of the area identified in Purple below LO007 for employment use, in Long Sutton. [Map provided by email]		Officer Comment:	The support is noted and welcomed.	
Policy Number:		Map Number:	7				Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:	LO007								

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: 07: Long Sutton

Response Number: 247 **Respondent Number:** 2440 **Comment Author:** Martin Dickinson **Client:** **Web Link:**

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

Policy Number: **Map Number:**
Site Allocation Number: Los015

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

1. The agricultural barn adjacent to Seagate Road should not be destroyed. 2 The proposed plan between Wisbech Road and Seagate Road Long Sutton should be rejected for exactly the same reasons as the Long Sutton / Gedney proposed plan.

Two reasons:
 1 The proposal document states that natural habitats have been audited and are compliant. I wish to ask if this applies to the agricultural barn adjacent to Seagate Road, see attached photographs, which although covered in ivy is in fact complete and I believe contains a colony of bats and family of Barn Owls and therefore should not be destroyed. Please confirm the Natural Habitat Audit of this barn did indeed take place as it is quite obvious there has been no entry into the barn for a number of years. I do not believe any such audit has taken place.
 2. I reference the report in the Spalding Voice dated Thursday September 8th 2016 pertaining to the proposed development between Long Sutton and Gedney. "A proposed development of 86 homes was recommended to be built 1.5 metre above existing ground level to counter the risk of flooding," The proposal was rejected. "Coun Peter Coupland (Fleet) said, " Eighty-six homes on the edge of a small town five feet in the air. I think you've got to put that in your mind and think exactly what that's going to look like. "This is one of the highest to come before us." He queried whether the EA recommendation had to be followed. Officers replied that whilst approval by the council at a lower height was possible, it would be a risk to go against the statutory body's advice. Surely the proposed development between Wisbech Road and Seagate Road falls into the same category indeed more so, with a minimum of 200 homes being built, I assume 1.5 metres high to avoid flood risk. The precedent has been set. This proposed development should also be rejected for the same reasons as the Long Sutton / Gedney development was. See attached cutting from the Spalding Voice.

The Long Sutton Housing Paper (April 2016) states that 'the SHLAA identifies that the site 'will not have adverse impacts on natural, built or historic assets' however an Extended Phase 1 Habitat Survey may be required to identify the presence/absence of biodiversity interests on the site and to identify whether further surveys will be required, such as for protected species'. This would include bats and owls. These surveys would take place as part of the planning application process. The site is within Flood Zone 3a, and the majority of the site is within flood hazard in 2115 'danger for most', and flood depth in 2115 '0.25-0.5m', one of the most sequentially preferable sites in terms of flood risk in Long Sutton. The Environment Agency advise that mitigation is likely to be Finished Floor Levels to be set 500mm above ground level, flood resilient construction shall be used to a height 300mm above the predicted flood level. In contrast the site referred to (Ged001) is within Flood Zone 3a, flood hazard in 2115 'danger for most', and flood depth in 2115 '1-2m' which would require a different standard of mitigation with finished floor levels designed to be higher therefore the dwellings would be raised to be further out of the ground. At planning application stage each site is considered on its own merits and Ged001 was considered to be inappropriate in that local context.

No change to the Local Plan is required.

Post Title: 07: Long Sutton

Response Number: 419 **Respondent Number:** 2824 **Comment Author:** Jackie Kemball **Client:** **Web Link:**

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

Policy Number: **Map Number:** 7 **Site Allocation Number:** LOS015

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

As per the previous comment, the old windmill on the B1359 is also suspected to house bats, meaning the surrounding area is part of their natural area and would destroy the breeding and living area for this protected species. It is my belief that no audit has been carried out on these areas relating to other protected species. In addition it is expected with significant increase in population, that increases in primary school placement, extension to doctors surgeries and fire stations should be adequate to support any rise in population, this has not been considered and therefore it is suggest that local amenities and facilities would suffer an increase strain and put lives at risk.

The Long Sutton Housing Paper 2016 states that 'the SHLAA identifies that 'the site will not have any adverse impacts on natural, built or historic assets'. However an Extended Phase 1 Habitat Survey may be required to identify the presence/absence of biodiversity interests on the site and to identify whether further surveys will be required such as for protected species.' These surveys take place as part of the planning application process. The Infrastructure Delivery Plan assesses the potential impacts the level of new development proposed by the Local Plan will have upon local facilities and services. Strategic improvements have been identified in the Local Plan. Policy 7 sets out the approach to securing developer contributions from new development which will help mitigate any impacts new development will have on local infrastructure, such as schools and doctors. This will be negotiated at planning application stage. A Transport Assessment will be required as part of the planning application for Los015 to show how traffic movements will be safely addressed.

No change to the Local Plan is required.

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

This proposed site should not be approved without the satisfactory auditing and a sound and substantial increase in local amenities and facilities. Care should also be taken to ensure that any increase in traffic does not impact on the already congested A17 or that London Road/High Street has sufficient traffic calming to ease the pressures of travellers attempting to bypass the A17, often at excess speeds.

Participate in Examination:

Why wish to participate

Post Title: 07: Long Sutton

Response Number	434	Respondent Number:	907	Comment Author:	Geoffrey Collings & Co	Client	Ms S Anderson	Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:		Map Number:	7	The Response to comments received under Long Sutton's Place in The Spatial Strategy (July 2016 Public Consultation) states at paragraph 2.3.19 that "there is planning permission for 160 dwellings in Long Sutton. It is accepted that it is preferable to develop these sites first, but such sites are not coming forward at the rate required to meet Long Sutton's housing needs so additional sites will need to be identified". The response at paragraph 2.3.20 states "it is accepted that the former Butterfly Park has planning permission for housing development. During the public consultation there was some concern expressed about this planning permission. Recent discussions with Members also revealed concerns about this proposal indicating that there was no desire to ensure development in this location if the planning permission for the present proposal were to lapse. The site has, therefore, been designated as lying outside the emerging settlement boundary for Long Sutton". The planning consent on the Butterfly Park for 87 dwellings has been 'saved' by implementing the appropriate conditions to include minimum physical work on site undertaken on behalf of the owners of the site. The current attitude of the Local Planning Authority IS NOT to consider any alternatives to the 'saved' consent. We consider the 'saved' consent is incapable of delivery. We further consider delivery of a second site for 39 dwellings also included in the 160 dwellings with planning consent is also problematic in terms of delivery. The planning consent will lapse in October of this year. We proposed as part of 2016 Consultation a new Housing Site located off Station Road comprising part of Los020 and Los019, to include the dwelling 57 Station Road. In the event it is decided an ADDITIONAL allocation of residential development land is required for the reasons outlined above, we consider the site now proposed will meet the Site Allocations Flood Risk Sequential Test when compared to other parcels of land which might be considered. Additionally will be appropriate in terms of accessibility to the town's range of services, will have an acceptable relationship to the town's built-up area, and the visual impacts of its development would be relatively modest.	The planning permission for the Butterfly Park has been implemented, therefore it is considered to be deliverable. Site clearance has begun on the second commitment. It should be noted that the capacity of the allocations assumes a density of 20 dwellings to the hectare. In practice, some sites are likely to accommodate a higher density. But, the housing target is not expected to be delivered through allocations only, there are a number of smaller sites in Long Sutton that the SHLAA identifies as developable and within the settlement boundary that have not been allocated because they are too small (sites of 10 and less) which would contribute to the housing target. At this stage it is not considered necessary to allocate further sites for housing development.	No change to the Local Plan is required.
Site Allocation Number:						

Do you consider that this part of the Local Plan is

Legally Compliant

Sound

Prepared in accordance with Duty to Cooperate

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

Positively Prepared

Justified

Effective

Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

I consider it necessary to participate in the oral part of the Examination in Public in order to provide additional information as to why I consider the 2 major sites included in the outstanding planning permissions are incapable of delivery.

Participate in Examination:

Why wish to participate

Post Title: 08: Sutterton

Response Number: 432 **Respondent Number:** 2065 **Comment Author:** Brown & Co. **Client:** Mssrs D, R, A and M Craven **Web Link:**

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

Policy Number: **Map Number:** I do not consider the local plan is sound or legally compliant as the published map (map insert 8) does not show my client's land as a proposed area for commercial activity. The site (Spalding Road, Sutterton) has been granted planning permission under references B/05/0298 and B/07/0403 and we have had confirmation from Boston Borough Council that development has commenced thus implementing the planning permission. This confirmation was received from Rachael Vamplew via email on 19th May 2010. In this email it was stated that the works carried out 'constitute a material commencement of the development'. Therefore the planning permission has been activated and crystallised. For your information we attach confirmatory evidence. [evidence provided by email] Although the site may have been implemented, there has been no substantial development on site, indicating demand from the market for a site of this scale for general employment use is not high. So it is not considered that demand exists for a strategic employment allocation in this location. However, the site and any future development would be covered by Policy 8 'Other Employment Sites' which supports the re-use of previously developed land and the conversion of other buildings to employment use, including the agricultural related buildings on site. Additionally it supports the development of employment use subject to several criteria being met which should help fulfill the future aspirations for the site. **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:

I believe that it is necessary to show the relevant area, subject to the planning permission, on the map as a proposed employment site to reflect the fact that there is a commercial planning consent in place. The site should be recognised as having an extant permission in the new plan.

Participate in Examination:

Why wish to participate

Post Title: 09: Sutton Bridge

Response Number	239	Respondent Number:	2523	Comment Author:	J Maxey	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:	9	The Map for Sutton Bridge does not propose land North of Withington Street and Chestnut Terrace part of which is within the current development boundary as retained within that boundary and extended northwards as per our consultation responses at earlier stages of the plan. To have all proposed allocation in one ownership potential is a threat to delivery.		The site is not identified as an Allocation because it is less sequentially preferable in flood risk terms than the Allocation. The SHLAA does not identify any deliverability concerns with the Allocation – with completions and commitments the allocation is expected to deliver the housing target for Sutton Bridge therefore there is no need to allocate a second site.		No change to the Local Plan is required.	
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>						
Consistent with national policy	<input type="checkbox"/>								
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Allocation Land north of Chestnut Terrace and Withington Street within the development area for residential use								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	To ensure the alternative sites and their merits and the threats to delivery are fully considered and debated								

Post Title: 10: Swineshead

Response Number	345	Respondent Number:	2509	Comment Author:	Rollinson Planning Consultancy	Client	Woods Nurseries	Web Link	
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Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:	Officer Recommendation:
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Policy Number:		Map Number:	10	You will be aware of our comments about Swineshead and the Woods Nurseries site that were submitted at the Preferred Sites Consultation stage and we note that all comments made previously will also be submitted to the Secretary of State. This being the case, we do not need to repeat the comments made in August, 2016. Nonetheless, for completeness they are appended to this letter. We have reviewed the Publication Local Plan and its supporting document, especially the Swineshead Housing Paper from January, 2017 and the Site Allocations Flood Risk Sequential Test report dated February, 2017. Despite the comments made in the Swineshead Housing Paper in response to our previous representations we are of the view that the Local Plan is not sound; we believe that it is not positively prepared, not justified and that the Authority cannot be confident that it will be effective in delivering sustainable development in accordance with the NPPF. We note in the Swineshead Housing Paper that no comments were received concerning Swineshead's place in the Spatial Strategy; this is incorrect as our previous comments will testify.	The support for Policy 2's identification of Swineshead as a Main Service Centre is welcomed.	No change to the Local Plan is required.
Site Allocation Number:						

Do you consider that this part of the Local Plan is

Legally Compliant

Sound

Prepared in accordance with Duty to Cooperate

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

Positively Prepared

Justified

Effective

Consistent with national policy

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

Nonetheless, the identification of Swineshead as a Main Service Centre is welcomed and support offered to the Spatial Strategy set out within proposed Policy 2.

Given the importance of the settlement and its sustainability credentials, coupled with the explicitly acknowledgement that it is the only sizeable settlement in Boston Borough where significant areas of land at low risk or no risk from flooding are available, we remain of the view that the housing numbers for Swineshead (as set out within proposed Policy 11) should be increased and the Woods Nurseries site allocated for housing development. It is simply not considered that the assumption made in the Swineshead Housing Paper that it is likely that the Plan's provision for Swineshead will deliver more than 400 dwellings can be relied upon. Furthermore, whilst specific reference to Crowland was made previously (explicitly as an example) it is a matter of fact that very many of the proposed allocations across the whole of the plan area are constrained by flooding issues. A review of the tables in the Site Allocations Flood Risk Sequential Test report shows that many of the sites proposed to be allocated for new housing development are within Flood Zone 3 (with a danger for most hazard) and will require the Exception

It is not agreed that Policy 11 should be amended to increase Swineshead's housing requirement. Four hundred dwellings is considered to be the appropriate number, taking account of: the findings of the South East Lincolnshire Assessment of Settlements and their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. It is not agreed that flood risk issues will prevent the delivery of residential allocations in settlements within Boston Borough where flood hazard is more severe than Swineshead – the Whole Plan Viability Assessment demonstrates that flood mitigation costs will not threaten viability, and the SHLAA demonstrates that land-owners intend to release their sites in a timely manner. It is not agreed that allocations should be made over those required to meet the requirement - the Plan's assumptions on site capacities are conservative (assuming 20/hectare) and, in practice, it is likely that the Plan's provisions for Swineshead will deliver more than 400 dwellings, given that densities are likely to exceed this assumption.

It is not agreed that the site promoted by the objector (site Swi012) should be identified as a Housing Allocation. The site would have a poor relationship to the village's existing built form – although it abuts the existing village to the west, on all other boundaries it meets the countryside only. As a consequence, it is considered that the site's development would appear incongruous, and poorly-related to the existing, largely linear village. Furthermore, the Borough Council's Consultant Architect indicated that there should be caution about extending development too close to the Manwarings Ings Scheduled Ancient Monument (SAM). She commented that it is important for both wide and focussed views of the SAM to be maintained from within parts of the historic village. The development of site Swi012 would (thanks to its odd shape) potentially obscure views from both the south and east. If the site is developed, an open corridor which allowed a view of the SAM would need to be maintained.

Post Title: 10: Swineshead

Test to be passed (this includes all the proposed allocations in the Sub Regional Centres of Boston and Spalding). All that the Flood Risk report does is to determine whether the proposed allocations would need to be subject to the Exception Test. It is not considered reasonable to assume that in each case both elements of the Exception Test will be passed nor that development will be viable and delivered. For the Plan to be effective in ensuring delivery of sufficient new housing, it remains our view it is essential to fully utilise the sustainability and flood risk free attributes of Swineshead. After all, the NPPF is clear that new development should be steered to areas with the lowest probability of flooding.

The allocation of the Woods Nurseries site, much of which is already occupied by substantial buildings and hard surfacing, will help to ensure the delivery of sufficient new market and affordable housing. It will help to ensure that the plan is effective in boosting significantly the supply of new housing and providing choice and competition in the market for land. It is an available site which is appropriate for housing development in an area with a low probability of flooding. Its development would accord with proposed Policy 5 which states that major development shall be located in areas at the lowest hazard or probability of flooding. It would also be consistent with the Vision of the South East Lincolnshire in 2036 set out within the Publication Plan.

Post Title: 10: Swineshead

Response Number	513	Respondent Number:	2342	Comment Author:	Ashley King Developments	Client		Web Link																	
Paragraph Number:		Table/Figure:		Comment Content	<p>Swi038 and Swi044: Swineshead As we have commented in our representation on the Spatial Strategy (Policy 2), we support the draft Local Plan's identification of Swineshead as a Main Service Centre. We note that Swineshead, in particular amongst the settlements within Boston Borough, is less constrained by flood risk than many other similarly sized and larger settlements, and that it has also been shown to be a sustainable location for new development. Swineshead has scored well in terms of its sustainability as a location, due to its good range of facilities. It serves an important role as a service centre to its population and that of the surrounding rural area. This role can only be maintained in future through the provision of new housing, which will create continued demand for the services and facilities within the town.</p> <p>In this context, we support the draft Local Plan's provision of at least 400 new dwellings in Swineshead.</p> <p>Site Swi038 We support the identification of site Swi038 as a proposed housing allocation. Within Swineshead, site Swi038 is one of the most suitable locations for new development. It is located entirely within Flood Zone 1, whereas all of the other potential housing sites identified around the edges of the settlement are at least partly within Flood Zone 2. In terms of the application of the flood risk sequential test, this site is therefore naturally the first location to which new development should be directed. Planning permission (B/16/0052) has recently been granted for the construction of 63 dwellings on the southern and central parts of this site. Ashley King Developments also now control the central part of the site, and they intend to submit a further planning application for residential development on this land in the near future. The SHLAA 2017 has concluded that the site is suitable, achievable and deliverable, a conclusion which we share. However, we understand that the northern part of the site is not available for residential development, and the land owner intends to construct new agricultural buildings on this land.</p> <p>Site Swi044 Site Swi044 is land adjacent to Swi038. The SHLAA 2017 considers it available and achievable, but not suitable for development. The grounds for this conclusion are discussed below; we do not believe that there are any matters which would prevent a suitable</p>			Officer Comment:	<p>The support for Policy 2's provisions for Swineshead is welcomed.</p> <p>The support for Policy 11's provisions for Swineshead is welcomed.</p> <p>The support for the identification of site Swi038 as a Housing Allocation is welcomed. In November 2014, the owner of the northern part of site Swi038 indicated that they wished to pursue the residential development of their land.</p> <p>Site Swi044 was not included as a Housing Allocation for three reasons: the lack of a suitable vehicular access; potential impacts upon a nearby Local Wildlife Site; and because it was not regarded as being as sequentially preferable in flood risk terms as alternative sites in Swineshead. The objector has sought to address these three issues:</p> <ul style="list-style-type: none"> - the Highway Authority indicates that the junction/ access visibility is fine and Station Road has sufficient width and has a footway on the west side. There would be no fundamental problems with an increase from the existing proposal for 48 dwellings to 124. A 'looped' layout would be preferred (in the manner of the current layout) and a pedestrian link through to Coles Lane might be useful to promote pedestrian permeability. - the Lincolnshire Wildlife Trust (LWT) comments that omissions from the Ecological Survey suggest that it does not meet the industry standard guidelines set by the Chartered Institute of Ecology and Environmental Management for Ecological Appraisals, e.g. there is no evidence of a data search from LERC for records of protected and notable species or designated sites in the area. Perhaps for this reason there is no mention of the adjacent Cole's Lane Ponds Local Wildlife Site (LWS). Thus, the recommendations do not take into account the presence of the LWS and any potential impacts upon it from development of the site. The LWT indicates that the development of site Swi044 is not precluded, but it should be clear that mitigation to protect the LWS from potential adverse impacts like light, noise and visitor pressure will be required - the report does not address any of these issues. The LWT indicates that, if development goes ahead, a sensitively designed masterplan could ensure there would be no, or only minor, impacts on the adjacent LWS. However, the LWT identifies that the Ecological Survey does not really 																
Policy Number:		Map Number:	10	Officer Recommendation:	No change to the Local Plan is required.																				
Site Allocation Number:		<p>Do you consider that this part of the Local Plan is</p> <table border="0"> <tr> <td>Legally Compliant</td> <td><input checked="" type="checkbox"/></td> <td>Positively Prepared</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Sound</td> <td><input type="checkbox"/></td> <td>Justified</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td>Prepared in accordance with Duty to Cooperate</td> <td><input checked="" type="checkbox"/></td> <td>Effective</td> <td><input checked="" type="checkbox"/></td> </tr> <tr> <td></td> <td></td> <td>Consistent with national policy</td> <td><input checked="" type="checkbox"/></td> </tr> </table> <p>Do you consider that the Local Plan is unsound because it is not:</p>								Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>	Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>	Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>			Consistent with national policy	<input checked="" type="checkbox"/>
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input checked="" type="checkbox"/>																						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>																						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>																						
		Consistent with national policy	<input checked="" type="checkbox"/>																						
Compliant, Sound, Duty to Cooperate explanation:																									
Proposed changes to make compliant or sound:	<p>We believe that site Swi044 would therefore form a suitable housing allocation in the Local Plan, and it should be identified as such. In light of the non-availability of northern part of site Swi038, Swi044 could provide a suitable replacement location for residential development.</p>																								
Participate in Examination:	<input checked="" type="checkbox"/>																								
Why wish to participate	<p>Because the issues raised in this representation would be best explained to the Inspector in the format of a round-table discussion.</p>																								

Post Title: 10: Swineshead

development from being delivered on the site. The SHLAA firstly suggests that development could not be accommodated on the site because it is adjacent to a Local Wildlife Site, which lies to the east. We understand that there is scope to accommodate residential development within the site. An Ecological Scoping Survey has been prepared by Hillier Ecology to assess potential for development on this site. This concludes that the site itself is of low ecological value. It proposes the incorporation of a buffer zone to the adjacent dyke, to avoid any impact on water voles, and on-site improvements such as the incorporation of bird and bat boxes. However, no constraints are identified to a residential development within the site. We believe that a sensitively designed masterplan would allow for suitable buffers and new planting and ecological enhancements, which would ensure that there would be no unacceptable impacts on the nearby wildlife site. A copy of the Ecological Scoping Survey is included at Appendix 1 to this representation. The SHLAA also suggests that the development of site Swi044 could put the local wildlife site under pressure for development. We note that it would be protected from any such development, should it be likely to involve unacceptable impacts on local wildlife. As such, the land's development is unlikely, as the Local Wildlife Site designation would protect any wildlife interest. The SHLAA also notes that the site does not have a direct highway access. As the site sits adjacent to site Swi038, access can be provided through the development of that land. Ashley King Developments are in the process of acquiring this site, and would have full control of the access. The layout approved under the current planning permission would be altered, and an access accommodated through that site. This site is also one of the better performing sites in Swineshead with regard to flood risk. The SHLAA 2017 notes that whilst it is nominally within Flood Zone 3a, flood water poses 'no hazard', and flood water is anticipated to be at 'no depth'.

provide any indication of what this might look like or what measures may be required. Given the LWT's concerns with the Ecological Survey, it remains the view of the local planning authority that it would be inappropriate to allocate the site without concrete evidence that any possible harmful impacts on the nearby LWS can be successfully mitigated.

- site Swi044 is predominantly located within Flood Zone 3a (85% FZ3a, 11% FZ2, and 4% FZ1). Thus, in flood risk terms, site Swi044 is not sequentially preferable to those allocated in Swineshead (all of which are within Flood Zone 1).

Thus, it is considered that site Swi044 should not be identified as a Housing Allocation.