

Post Title: 01: Boston

Response Number:	321	Respondent Number:	2686	Comment Author:	Mr P Carter	Client:		Web Link:	
Paragraph Number:		Table/Figure:		Comment Content:	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:	1	I oppose the Planned Building Application, reference B/16/0436 in the vicinity of Lindis Road, Eastwood Road and Blackthorn Lane in Boston, on the basis that it is not sound. The planned application is not justified, as it was considered using recent past population figures, where there had been a large influx of migrant labour from predominantly Eastern European countries. However, the plan does not consider the likelihood of the population decrease in the Boston area, when such migrant labour moves out of the UK, due to the UK exit from the European Union. Proportionate evidence of migrant labour moving from the local area, and not renewing itself, means that there is no requirement for the housing development B/16/0436 between Lindis Road, Eastwood Road and Blackthorn Lane.		The most recent assessment of the need for new housing in Boston Borough was produced in March 2017, and took account of the most up-to-date information available on all relevant issues (including migration). The Peterborough Housing Market Area & Boston Borough Council Strategic Housing Market Assessment (March 2017) identified that 295 new dwellings would be required in Boston Borough per year between 2011 and 2036. Site Fis001 is one of the Housing Allocations put forward in Boston Borough to meet this need.		No change to the Local Plan is required.	
Site Allocation Number:	Fis001								
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input type="checkbox"/> Justified <input checked="" type="checkbox"/> Effective <input 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: 01: Boston

Response Number	383	Respondent Number:	2820	Comment Author:	Mr & Mrs N Fitton	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		<p>We realise that the comments you are requesting at the moment are to do with the legal process, and our comments are more personal ones relating to our property. However, we would like to have our views put on record anyway, as we missed last year's consultation, through not being aware of the plans until very recently, as we do not always buy the local paper.</p> <p>We live at number [deleted for privacy reasons], next to the field where the development will take place. The house has been there since 1955. Our garden borders the field for quite a long way. The side of the house is very near to the boundary with the field. We have a large bedroom window and a smaller upstairs window looking directly on to the field, along with four downstairs windows. The light and privacy of the house and garden would be adversely affected if new buildings were placed close to the boundary. The proposals for building houses on a raised level to avoid flooding would make the buildings necessarily higher, which would mean placing them further back from the boundaries of no. 41 and the other houses, in order not to obtrude.</p> <p>The trees, hedges and grass verge on the boundary between our property and the field provide a valuable wildlife corridor, which, in line with environmental sensitivity, should be allowed to continue. The wildlife species which live in our garden include bats, hedgehogs and newts. The existing boundary hedges and trees would also provide a pleasant backdrop for new residents moving to the site when building is complete.</p> <p>In 1996 we had the house underpinned because of some subsidence at the front of the house and the side closest to the field. Exploratory bore holes in the front lawn revealed a layer of loose running sand at depths between 1.5 metres and 7.5 metres. There was also evidence of a former pond, dating back some centuries, beneath the front of the house, extending out into the field. It would be worth investigating the structure of the soil in the proposed building sites before the foundations are dug, to avoid future problems.</p>	<p>It is inevitable that the development of this site would change the outlook of existing nearby dwellings, but this would be equally true of all alternative sites. At the time of a planning application, the layout and design of a scheme would be carefully scrutinised to minimise overlooking and privacy loss. It is considered that, notwithstanding the flood mitigation measures that are likely to be required, an acceptable development scheme will be achievable for the site.</p> <p>Trees, hedges, etc. located within the curtilage to the objector's home would be unaffected by development. Whether such features located within the development site would be retained would be determined at planning application stage. The site has not been identified as being of any special wildlife value (i.e. it is not a Local Wildlife Site, Site of Special Scientific Interest, etc.).</p> <p>The Borough Council's contaminated land data does not identify the site as filled land. The appropriate approach to foundations would be examined in detail at the time of applications for planning permission and building regulations approval.</p>		<p>No change to the Local Plan is required.</p>		
Site Allocation Number:	Fis038								
<p><i>Do you consider that this part of the Local Plan is</i></p> <p>Legally Compliant <input type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>		<p><i>Do you consider that the Local Plan is unsound because it is not:</i></p> <p>Positively Prepared <input type="checkbox"/></p> <p>Justified <input type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 01: Boston

Response Number	405	Respondent Number:	2260	Comment Author:	Ms D Dainty	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:		Re: Fis001 I oppose the planning application on the basis that it is not sound. Ref- sub paragraph 1.0.2. The local plan must be based on adequate up to date and relevant evidence. There has not been sufficient up to date reports re the above local plan. The ecological report has been accepted despite the fact that the said report is out of date. Due to the nature of the problems that there may be in the area there should be a stringent report on the land which contains what was Tommy Shooter's yard that may be contaminated. We have had little notification of the latest condition of this area. On this basis I do not consider the local plan sound. The report on the traffic contained a number of mistakes. Mistakes on names of roads and the number of pedestrian crossings, there being only one on Eastwood Road. With mistakes like these in a very important area i.e. The safety and welfare of our children on their way to and from school, we need a more detailed report. Despite being told our concern over lack of school places has no bearing on the decision it is no longer the norm for all primary school children to be accepted by their nearest school. This means that children will be walking further or being transported by car or other means increasing road traffic. On this basis I do not consider the plan sound.	Housing Allocation Fis001 is the subject of an undetermined (as at 26th May 2017) outline planning application for the construction of up to 180 dwellings (reference B/16/0436). The concerns that the objector raises about ecological, contamination and traffic reports relate to documents submitted with this planning application. Considering these issues and looking at the site as a Local Plan Housing Allocation, rather than the subject of a planning application: - it has not been identified as being of any special wildlife value (i.e. it is not a Local Wildlife Site, etc.); - it is likely that part of the site has been contaminated by previous use, and that remediation works would need to be carried out. However, it is considered unlikely that such costs would impact upon development viability; and - the Highway Authority comments that it is supportive of this allocation. The objector also raises concerns about impacts upon primary school capacity, and the County Education Authority has identified that Boston's primary schools are effectively at capacity. The Local Plan's proposals for housing growth will require the provision of an additional 3.5 Forms of Entry over the Plan period. The County Education Authority intends that this additional capacity will be provided by the provision of a new primary school to the west of the town, and the expansion of two existing primary schools - one to the west of the town, and one (Boston St Nicholas CE Primary) which is located within 750m of Fis001.		No change to the Local Plan is required.		
Site Allocation Number:	Fis001	Do you consider that this part of the Local Plan is Legally Compliant <input type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>							
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: 01: Boston

Response Number: 459 **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:** 1 **Site Allocation Number:** Wes002 **Comment Content:** This allocation is Supported. **Officer Comment:** The support is noted and welcomed. **Officer Recommendation:** No change to the Local Plan is required.

Do you consider that this part of the Local Plan is

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

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

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

Compliant, Sound, Duty to Cooperate explanation:

Proposed changes to make compliant or sound:

Participate in Examination:

Why wish to participate

This site has been the subject of pre-application engagement with the LPA (LPA's response dated 6 April 2017) and an EIA Screening Opinion has also been submitted on the 12 May 2017. Broadgate as a housebuilder is keen to accelerate delivery to meet the local plans objectives. The proposal for this allocation includes education provision, which will assist with the wider expansion objectives of the settlement. Broadgate support allocation Wes002. The site will come forward as part of a master planned expansion and safeguards the road Corridor for the Boston Western Distributor Road which the DP estimates to Cost £51 million.

As is evidenced by the early pre-application engagement to the LPA, Broadgate has an ongoing development programme for this site and to this end can ensure that it will make an early contribution to the council's five-year supply of deliverable housing land and that provision is made to safeguard the route of the Western Distributor Road when considering a master plan for the site as a whole.

Broadgate controls land at Roseberry North. This site is well related to the services and facilities of Boston, close to Endeavour Park and Boston West Primary School and the Grammar School and could bring forward some 106 dwellings to meet the overall requirements for the settlement. This site is currently under construction, with 25 of the 106 properties already sold.

The need for a comprehensive masterplan for this strategic growth area and the phasing of the allocations to align with this overarching spatial framework and be informed by the project level HRA, surface water management strategy distribution of land uses and road alignment and open Space etc. Is Supported.

Officer Comment: The support is noted and welcomed.

Officer Recommendation: No change to the Local Plan is required.

Post Title: 01: Boston

Response Number	460	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:	1	Wyberton Orchard Site: While the allocation at Boston is welcomed, Broadgate consider that the Plan does not go far enough to secure the required level of housing given the step change in housing provision that is required. For this reason, additional housing is proposed to allow greater flexibility and choice should historically low rates of implementation not pick up. The site at Wyberton, in which Broadgate has an interest and shown on the attached plan, can support 150 dwellings. The site has a direct boundary with the urban area and lies within flood zone 3a.		The South East Lincolnshire Strategic Housing Land Availability Assessment (April 2017) (SHLAA) gives this site the reference Wyb010. The SHLAA classifies site Wyb010 as being undevelopable, and 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. This objection does not raise any issues that suggest that the previous approach taken to this site was inappropriate.		No change to the Local Plan is required.	
Site Allocation Number:		Do you consider that this part of the Local Plan is							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>	The site has independent access and is fully serviced. This site also offers early delivery to address the five-year housing requirement and Broadgate is of the opinion that it should also be allocated to contribute to Boston's overall housing requirement. With the larger allocated sites at Boston 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 submitted by email]		It is not agreed that the Local Plan's housing allocations in Boston are inadequate to meet needs. Because it is promoted by a housebuilder it is likely that, were it to be allocated, site Wyb010 could potentially be delivered relatively quickly. However, there is no shortage of sites expected to deliver dwellings in years 6-10 and 11-15 of the Plan period.			
Sound	<input type="checkbox"/>	Justified	<input type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:									
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	Because of Broadgate's experience of housing delivery and the importance of the provision of strategic infrastructure to bring forward the time-scales for housing development.								

Post Title: 01: Boston

Response Number: 491 Respondent Number: 2534 Comment Author: Ms T Cooper Client: Web Link:

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

Policy Number: Map Number: 1 Site Allocation Number: FIS001

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

Further to my comments a couple of months back I stand by all particulars. I can categorically state that no building on flood plains is a sound idea. Of course it isn't and never can be. All Boston and surrounding areas are on a flood plain. With sea levels rising all the time we are hastening our own destruction building in this way. Covering our green fields with concrete, complete madness. Boston is surrounded by water, helped out with the main River Witham, large dykes and drains, even rain water coming up through drainage holes in the road with a downpour. Any more surges like a couple of years ago and more pieces of concrete to make sure well be covered with flood water.

Your pond idea next to Blackthorn Lane House Development Scheme will be an attraction for children as a play water area. The Rats will love it, creating an environment hazard. We are over run with rats from the big field. Blackthorn Lane, Eastwood Road we've all got them. I've known this the 20 years I've been here. I have pest exterminators yearly, coming to get rid. I've seen them (2) in the day recently April/May running round the garden bolting into the corner where they go. They all come from the field. Advertise your buildings of the new properties but with a rat infestation surrounding it - on the very land where it sits and see how many people would hurry to move in.

Traffic and Privacy for the existing family homes around the development. It will take away any privacy and will overlook properties.

A noise hazard with cars coming in and out. Constant but worse at various times. School children (school Run) not at all conducive to anything. Parking all round Blackthorn Lane (itself) and in neighbouring roads. Access Roads Lindis road will be impossible with residents trying to get out of their drives and back in, and plus your access traffic to and from school and into town. Eastwood Road will be heavily affected, its bad enough now. The coop and shop with the post office are often a no parking zone - All parked up. At least 200 cars will be added to the mix. Its just ridiculous. The roads are full of potholes now, constantly needing repair. From Eastwood Road leading to the Main A52 road to Skegness, the other way to Pilgrim Hospital (A16) and going to Boston town centre (two main roads there affected) Then you've got Eastwood Road and Freiston

Flood mitigation measures and the incorporation of sustainable drainage systems will be required, but it is considered that an acceptable development scheme will be achievable for the site.

It is considered likely that the rat problem described by the objector would be solved rather than worsened by the development of site Fis001.

It is inevitable that the development of this site would change the outlook of existing nearby dwellings, but this would be equally true of any alternative site. At the time of a detailed planning application, the layout and design of a scheme would be carefully scrutinised to minimise overlooking and privacy loss.

The Highway Authority comments that it is supportive of this allocation.

The site has not been identified as being of any special wildlife value (i.e. It is not a Local Wildlife Site, Site of Special Scientific Interest, etc.).

No change to the Local Plan is required.

Post Title: 01: Boston

Roads leading to John Adams Way in or out of Boston town centre. All main roads getting clogged with traffic lights often over ruled with stationery traffic. We all expect to be late for appointments with John Adams Way. Roads all leading to it with your access roads - not built for the volume of traffic you are forcing on us.

As well as desecrating any wildlife which there is, to traffic, privacy, rats (over crowding houses) land covered in concrete I would say No way, Not Sound. As a member of Lincolnshire Wildlife Trust it does concentrate the mind on Wildlife especially when the site is a green field and there is wildlife on it. Butterflies and bees are attracted to the thistles and Buddleia growing on a patch of land near the site. Both species are needing help as the loss of habitat is lessening their numbers. In the end they will all be extinct. The site is behind my property as well on the left side of it but I have a visual of it as the main field behind me is quite large. Weve all seen bats flying about, but where mine come from I don't know. I know they are protected. They've seen them down Blackthorne Lane and surrounding area. Trees help us as well as some wildlife does but we are all chopping trees down as quik as we can. They help with Oxygen I'm told as well as nesting sites for all sorts of small animals and birds. We would be overrun with more harmful bugs were it not for the little creatures living amongst us quietly working. It seems to be Destroy the Wildlife, Build the House. That is the maxim for 2017. How sad and ignorant, especially as they help us with our quality of life.

Post Title: 01: Boston

Response Number: 536 Respondent Number: 932 Comment Author: DLP (Planning) Ltd Client: Mr R Hardy and Richard Hardy (Fishtoft) Web Link:

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

Policy Number: Map Number: 1 [Appendices A, F, G, H, I, J, K, L, M were submitted by email but have not been uploaded due to their size] Sustainable Urban Extensions: Sou006 & Wes002 Notwithstanding the fundamental concerns regarding the SA Report, the Council has proposed to allocate two sustainable urban extensions on the west side of the town; Sou006 Land south of Chain Bridge Road; and Wes002 Land south of North Forty Foot Bank. The Council has previously discounted site Fis017 Land south of Wainfleet Road which is located on the east side of the town. Although Wes002 scores similarly to Fis017 in the SA, both the Council's SA and SPRUs reassessment of the SA of Sou006 indicates that it has a relatively poor SA score. In particular the site is assessed by the Council and SPRU as likely to have a major negative effect in terms of heritage. In this regard, there is likely to be significant adverse effects on the setting of the Scheduled Ancient Monument located on Wyberton West Road (a medieval moated site). It is noted that Historic England has previously raised concerns about the development of Sou006 in terms of the impact on the Scheduled Monument. In the consultation response to the January 2016 Draft for Public Consultation Historic England state: Sou006 will surround Scheduled Monument 1019528 "Moated site north east of Wyberton Hospital" to the south and west. Strong concerns were raised at pre-application stage and these are again re-iterated. There is concern that the Sustainability Appraisal site appraisal assesses the site on page 28 of the Boston South section as follows:- 'Development may have an adverse impact on the neighbouring Scheduled Ancient Monument, a mooted site 480m north east of Wyberton West Hospital. However, development on this scale offers opportunities to mitigate such impacts effectively and could be avoided by careful layout and design'. The assessment of the sustainability is inadequate as it fails to address the impact, as required within the NPPF. It is not considered that the impact of near complete enclosure could be mitigated, given the existing open views which form an intrinsic part of the scheduled monuments setting. The Joint Planning Un's response simply states: The Borough Council's Consultant Architect comments that this site borders onto a scheduled ancient monument located on Wyberton West Road (a medieval moated site) which is located in an urban area which has developed close to the south side of the South Forty Foot Drain. Although there are Potential impacts of site Sou006 upon historic assets - It is not accepted that inadequate consideration has been given to the potential impacts of the development of site Sou006 upon the neighbouring Scheduled Ancient Monument (SAM). Nor is it accepted that the development of site Sou006 will cause substantial harm to the SAM (provided that the development takes proper account of the points raised by the Borough Council's Consultant Architect). Further consideration of this matter will be necessary as part of the Examination.

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

Sou006 should not be allocated for development unless the Council can demonstrate compliance with paragraph 14 of the National Planning Policy Framework. All sites should be reassessed in a consistent manner. Fis017 should be allocated having due regard to the provisions of the Framework and the Council's evidence when considered against the reasonable alternatives.

On behalf of Mr R Hardy and Richard Hardy (Fishtoft) DLP (Planning) Ltd has submitted comprehensive representations to the R.19 consultation which set out in detail that the Plan is both unsound and not legally compliant. We consider that it is appropriate for DLP (Planning) and the Strategic Planning Research Unit (SPRU) to represent Mr R Hardy and Richard Hardy (Fishtoft) at hearing sessions during the examination of the plan to re-state and expand on these written representations and participate in the discussion.

[Appendices A, F, G, H, I, J, K, L, M were submitted by email but have not been uploaded due to their size] Sustainable Urban Extensions: Sou006 & Wes002 Notwithstanding the fundamental concerns regarding the SA Report, the Council has proposed to allocate two sustainable urban extensions on the west side of the town; Sou006 Land south of Chain Bridge Road; and Wes002 Land south of North Forty Foot Bank. The Council has previously discounted site Fis017 Land south of Wainfleet Road which is located on the east side of the town. Although Wes002 scores similarly to Fis017 in the SA, both the Council's SA and SPRUs reassessment of the SA of Sou006 indicates that it has a relatively poor SA score. In particular the site is assessed by the Council and SPRU as likely to have a major negative effect in terms of heritage. In this regard, there is likely to be significant adverse effects on the setting of the Scheduled Ancient Monument located on Wyberton West Road (a medieval moated site). It is noted that Historic England has previously raised concerns about the development of Sou006 in terms of the impact on the Scheduled Monument. In the consultation response to the January 2016 Draft for Public Consultation Historic England state: Sou006 will surround Scheduled Monument 1019528 "Moated site north east of Wyberton Hospital" to the south and west. Strong concerns were raised at pre-application stage and these are again re-iterated. There is concern that the Sustainability Appraisal site appraisal assesses the site on page 28 of the Boston South section as follows:- 'Development may have an adverse impact on the neighbouring Scheduled Ancient Monument, a mooted site 480m north east of Wyberton West Hospital. However, development on this scale offers opportunities to mitigate such impacts effectively and could be avoided by careful layout and design'. The assessment of the sustainability is inadequate as it fails to address the impact, as required within the NPPF. It is not considered that the impact of near complete enclosure could be mitigated, given the existing open views which form an intrinsic part of the scheduled monuments setting. The Joint Planning Un's response simply states: The Borough Council's Consultant Architect comments that this site borders onto a scheduled ancient monument located on Wyberton West Road (a medieval moated site) which is located in an urban area which has developed close to the south side of the South Forty Foot Drain. Although there are

Potential impacts of site Sou006 upon historic assets - It is not accepted that inadequate consideration has been given to the potential impacts of the development of site Sou006 upon the neighbouring Scheduled Ancient Monument (SAM). Nor is it accepted that the development of site Sou006 will cause substantial harm to the SAM (provided that the development takes proper account of the points raised by the Borough Council's Consultant Architect).

The Boston Distributor Road (BDR) - The benefits of the BDR are modelled by the Boston Transport Strategy and the potential provision of the Road is lead by the Lincolnshire Transport Plan 4 (LTP4). The Local Plan has been prepared accordingly. The actual route (apart from modelling to show a western route to be the most beneficial and feasible) and what infrastructure may be required are yet to be modelled and designed.

Site Fis017 - The positive attributes of this site are acknowledged, but it is considered to be an inferior site to Wes002 and Sou006 because it: lacks housebuilder support (i.e. its delivery is uncertain); and cannot contribute directly to the provision of a distributor road.

Site Wes002 - It is not agreed that the development of this site will have an adverse impact upon the character and appearance of the area.

Lack of policies to support allocations and subsequent delivery - The issues affecting the Vernatts and Holbeach West Sustainable Urban Extensions are considerably more complex than those affecting sites Sou006 and Wes002. Consequently, there is considered to be no need for specific policies to guide the development of these sites - instead, it is intended that a masterplanning approach will be used.

Site Fis017a - the South East Lincolnshire Strategic Housing Land Availability Assessment identifies that this site is developable. Given that it is exposed to less severe flood risk than other similar sites which are identified as Housing Allocations in the Local Plan Publication Version, there is an arguable case for it to be allocated.

Post Title: 01: Boston

houses to each side of and opposite the Monument, the land to its south is largely free from development apart from some low level bungalows which form a U shaped block. The open area behind the bungalows is a sports ground. The rest of the area to the south and west of the Monument is currently agricultural/grassed land and it is this area which is the proposed local plan site. Scheduled ancient monuments are of national importance and the setting of this Monument will be affected by urban development on its west side. In order to retain the rural character of this ancient monument site it will be important to ensure that the development of site Sou006 is screened by the trees which are already present and that these are added to. Tall buildings (three storey or over) should not be located close to the southern and western boundaries of the Monument. White bargeboards also need to be avoided as these can be very jarring and intrusive. Whilst failing to acknowledge or address Historic England's comments, particularly that the impact of near complete enclosure could not be mitigated against, the Joint Committee conclude that Sou006 should be taken forward as a preferred housing site. The Framework provides clear guidance in section 12 with regard to conserving and enhancing the historic environment. Paragraph 126 requires Local Planning Authorities to recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. Paragraph 132 is unequivocal that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional (DLP emphasis). Paragraph 133 goes on to state that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, Local Planning Authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits

that outweigh that harm or loss, or all of the following apply: the nature of the heritage asset prevents all reasonable uses of the site; and no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use. In order to ensure that the Local Plan meets the presumption in favour of sustainable development the requirements of paragraph 14 must be met. The second part of paragraph 14 requires Local Planning Authorities to meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or Specific policies in the Framework indicate that development should be restricted. Paragraphs 132 and 133 are clearly specific policies that restrict development that would lead to substantial harm to or loss of designated heritage assets of the highest significance including scheduled monuments. Historic England has stated that the existing open views form an intrinsic part of the scheduled monuments setting and the impact of developing Sou006 would result in near complete enclosure of the Scheduled Monument and could not be mitigated. The Council has failed to address the Local Plans conflict with paragraph 14 in this respect. The Council acknowledge in the SA that the allocation of Sou006 is likely to have a major negative effect in terms of heritage but appear not to have taken this into consideration through the site selection process when allocating the site.

In contrast, Fis017 which is an alternative site of comparable size, scores well in the SA. The SA identifies no major negative effects associated with the development of this site. DLP has previously submitted representations to the South East Lincolnshire Local Plan promoting Fis017 for residential development and contending that the Council's desire to deliver the BDR has largely driven the allocation of sites to the west of the town, including Wes002 and Sou006. In the Council's response to our previous representation, they state that the positive attributes of Fis017 are not disputed however when considered against Wes002 and Sou006 it is considered to be inferior on the basis that no housebuilder is promoting the site, and it cannot contribute directly to the provision of a distributor road.

Post Title: 01: Boston

With regard to provision of a distributor road, as per the findings of the SPRU report, the South East Lincolnshire IDP (2016) fails to make it clear how the BDR will benefit Boston. The transport strategy recognises the need for the scheme, and it will, as stated at paragraph 4.8.1, provide traffic with an alternative route to travelling through and around the town centre and unlock delivery of the proposed housing land. However, there is little evidence to support this. In fact, the Baseline Study is contradictory to this, stating at paragraph 4.23.4: Whilst it was anticipated that the distributor road will have some relieving effect on existing traffic routes by providing an alternative, modelling of the proposals indicated that any benefit to traffic in Boston is marginal. There has been another modelling study completed within the Boston Transport Strategy (also November 2016) however these findings are not referred to in the IDP and it is not clear what the wider impacts or benefits will be. The BDR is also relying on the creation of a new bridge across the South Forty Foot Drain and adjacent railway, which has been a concept for years. However if this is not built, the development of the BDR, combined with the housing developments, will add to the congestion which already occurs at the mini roundabout where Boardsides meets the Sleaford Road and the A52 (paragraph 4.8.14 of the IDP). However there is no bridge crossing planned for as of yet, and it does not form part of the Local Transport Plan funding and it is not clear when it will be delivered. This suggests that the BDR may cause more harm than good. The IDP also states that the River Witham needs a bridge and the B1183/Railway/Maud Foster and Willoughby Road needs significant transport structures to cross, estimated at a cost of £80 to £100m. The Baseline Study states at paragraph 4.23.4: there are sections requiring major structures over rail, road and water that cannot be funded at present and, without which, the route will not function as a distributor road. Clearly, they still cannot be funded at present. The modelling scenario in the Boston Transport Strategy (2016) is also based on this infrastructure being provided, and does not model a scenario based on the chance that this infrastructure cannot be funded, which is entirely possible. It is unclear what the impact of the scheme would have on existing transport networks if only partially completed. Either way, the entirety of the infrastructure cannot be provided until after the plan period (this is made clear in the Transport Strategy) and one of the arguments against the BDR (Transport Strategy 2016, page 153) is that funding should be going towards more sustainable schemes which are less

intrusive and encourage people to use their car less, and future schemes should be aiming at mitigating climate change, not increasing it. Overall the Boston Distributor Road is deemed unnecessary, and yet the Council place significant weight on the potential for sites Sou006 and Wes002 to contribute directly to its provision as a reason for allocating the site.

Whilst it is acknowledged that Fis017 is not being directly promoted by a housebuilder currently, it is in single ownership. There is developer interest in the site and the owner is engaged in active discussions with a number of local and regional housebuilders. Fis017 is located in the Fishtoft area, which in general, is not a deprived Ward. As noted above, ONS statistics indicate that compared with the Lincolnshire average, its long term unemployment rate was below average (19.6% compared to 25.6%) as was its crime rate per 1000 at 28.5 compared to 49.7. Furthermore, the percentage of residents without access to a car is below the County average (15.1% compared to 18%). As such, it is likely to be an attractive market area for housebuilders. It is therefore considered that the achievability of delivering site Fis017 is also high. In any case, the fact that site Sou006 is being promoted by an active housebuilder, is not considered so significant as to outweigh the potential significant impact on the schedule monument should development of the site progress. The Council's drive to allocate Sou006 appears to have disregard to the evidence base and is driven by the desire to bring forward an infrastructure item at great cost to the public that does not demonstrably deliver any improvements to the local highway network. Furthermore, the Council acknowledge in the SA that site Wes002 has a poor relationship with the existing built up area of Boston and would appear visually incongruous. As such the Council accept that development of the site would therefore have an adverse impact on the character and appearance of the area. In contrast, Fis017 is acknowledged by the Council to relate well to the existing settlement. The site is well contained by the A52 to the north, Rochford Tower Lane to the east and residential development to the south and west. Overall the allocation of Sou006 is clearly not justified, nor is it consistent with national policy given the likely major negative effect in terms of heritage. Site Fis017 is considered to be the most sustainable site for allocation having due regard to the provisions of the Framework and the Council's evidence (including the SA) when considered against the reasonable alternatives.

Lack of policies to support allocations and subsequent delivery One of the 12 core planning principles outlines in the Framework requires Local Plans to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. The absence of any policies detailing the allocations and how they will be delivered is therefore significant. Likewise there is no policy on the BDR, presumably as there is no evidence to suggest that it would provide any demonstrable improvement to the local highway network or indeed can be funded in full. As a result, there is no certainty provided as to what the Sustainable Urban Extensions will need to deliver in terms of housing numbers, density, infrastructure (schools, local centres, public open space etc.), housing mix etc. Likewise there is no policy requirements for the sites to deliver any element of the BDR, which is surprising considering how much weight has been given to this by the Council when determining which sites to allocate in the Local Plan process. With particular regard to Sou006 there is no policy to inform how the site will need to be developed to have regard to the setting of the Scheduled Monument which is located close to the site. This is contrast to the Sustainable Urban Extensions in South Holland District which are allocated through policies 12 and 13. Notably, policy 12 provides details about how the Sustainable Urban Extension will deliver the northern section and part of the central section of the Spalding Western Relief Road. The Local Authority, developers, local residents or anyone with an interest in the area cannot be sure as to what the sites will be able or required to deliver. Planning applications could be made speculatively across the site with limited infrastructure provided given the lack of detail in the plan. In the respect the plan fails to be effective and is not consistent with national policy. It is therefore unsound.

Fis017 The site was previously included in the draft Local Plan for South East Lincolnshire as a potential housing site (reference Fis017) but was discounted in the Preferred Sites for Development stage of the Local Plan. Please note that a small parcel of land at the north east corner of the site that was previously included in site Fis017 is not owned by Mr R Hardy and Richard Hardy (Fishtoft). This representation therefore relates solely to the land owned by Mr R Hardy and Richard Hardy (Fishtoft) as shown in figure 1. For ease of reference, the site is continued to be referred to as Fis017 in this representation but is subject to the above

clarification. The representation also promotes a proportion of the site (circa 9ha see figure 2) as a stand-alone site. The representation will demonstrate that this parcel of land (hereon referred to as Fis017a) can be developed independently of the Sustainable Urban Extension early within the plan period, without prejudicing the wider development of the land.

Site Context The site (Fis017) is located on the north eastern edge of Boston in Lincolnshire (see Appendix F for site location plan). The site comprises circa 74ha of agricultural land that is in single ownership. There are no built structures within the site itself. The northern boundary of the site is defined by Wainfleet Road (A52). Towards the east, this boundary is open with a grass verge and ditch. Towards the west, the northern boundary is defined by the rear gardens of existing residential properties on Wainfleet Road and the Burton Hall Bowls Club, Burton house (currently a Premier Inn hotel) is immediately to the north west. There is an existing field access off the A52. The eastern boundary of the site is largely open and from south to north follows the rear gardens of existing residential properties on Rochford Tower Lane before it continues north along the western edge of Rochford Tower Lane and then to Rochford House before continuing north east to meet Wainfleet Road. The southern boundary is defined by the rear gardens of properties on Eastwood Road and the western boundary is defined by the rear gardens of properties which form the existing eastern edge of the settlement, namely those on Somersby Green, Somersby Way, Princess Anne Road, Sandringham Gardens, Buckingham Close and Blackthorn Lane. In this regard, and in contrast to Wes002 that is proposed to be allocated for residential development, the site is evidently well contained and relates well to the existing settlement of Boston. A smaller proportion of the site (Fis017a) is also promoted through this representation as a standalone development site. This site comprises circa 9ha of land and is located at the north-west corner of the overall land holding (see Appendix G). This land is bound by existing residential development to the north, south and west. Boston is the second largest town in Lincolnshire with a vibrant centre. Leisure facilities include a cinema, restaurants, theatre and arts centre and leisure centre. National retailers are located within the historic core and are part of the Prescod Square Shopping Centre and a market is also held twice a week. The town provides access to a full range of education opportunities including further education at Boston College. A number of health facilities are located within Boston including

the Pilgrim Hospital, a regionally significant health resource. In term of employment opportunities, as a port, Boston has a long established history of trade which has evolved into other employment opportunities which include the Riverside Industrial Estate and the Quadrant Boston. The town of Boston clearly benefits from the facilities and services to support new development; this is reflected in its designation as a Sub-Regional Centre in the Publication Version of the South East Lincolnshire Local Plan. Development Proposals The site is considered to be appropriate for residential development as it forms an area of undeveloped land immediately adjacent to the settlement edge. An indicative Landscape Framework and Development Concept Plan has been prepared by Liz Lake Associates and is submitted with this representation at Appendix H. The plan demonstrates that if fully implemented, the scheme could provide for a significant amount of residential units (circa 1,336 dwellings), along with associated landscaping, sustainable urban drainage, public open space/play facilities, education and shops/community facilities. In this regard it is reiterated that SPRUs review of the IDP identified the following list of infrastructure items that would benefit Boston most in terms of the future need identified: Primary school Secondary school GP Surgery Village/Community Hall Synthetic turf pitch Junior Football pitch Allotments Fis017 has the capacity to deliver a selection of these items and help the Plan to meet identified infrastructure needs and we would welcome further discussion with the Council and its partners to identify the most desirable infrastructure items to deliver. In accordance with Policy 24 (The Natural Environment) of the emerging Local Plan, Suitable Alternative Natural Greenspace (SANGs) is provided on site and the site will be the subject of a project-level Habitats Regulations Assessment (HRA) to assess the impact of recreational pressure on the Wash and the North Norfolk Coast European Marine Site. Given that DLPs assessment has demonstrated that the Council cannot demonstrate a five year supply of housing as required by the Framework, this representation also seeks to promote Fis017a as a standalone parcel of land that could be delivered independently of the wider Sustainable Urban Extension early in the plan period. That said the site, if developed independently, would also not prejudice the development of the wider parcel of land. Appendix I provides an Indicative Landscape Framework and Development Concept Plan for this phase of the development. The plan demonstrates that if fully implemented, the scheme could provide 195 dwellings

together with open space, sustainable urban drainage, landscaping. The development of both Fis017 and/or Fis017a would provide a mix of tenures, providing both affordable and private market types in a variety of bedroom sizes. Allocating the site would help the Council to deliver the homes it requires in order to meet the objectively assessed housing need for the Borough. Unlike Wes002 which is proposed to be allocated in the Publication Version of the Local Plan, Fis017 and Fis017a form a logical extension to the existing settlement without significant detriment to the local character of the area. As such, the site is considered to present a prime opportunity to utilise the growth potential and sustainability of this site to contribute to the severe need for housing in the Borough.

Access and Highway Considerations This representation is supported by a Preliminary Transport Assessment (TA) (Appendix J) which considers the development of both Fis017 and Fis017a (referred to as phase 1 in the Assessment). The report sets out the key transport issues relating to the feasibility of delivering the two residential options. The conclusions of the Assessment are summarised below.

Baseline highway conditions: A comprehensive review of the local highway network in the vicinity of the site and through the central area of Boston has been provided, with the identification of some baseline operating conditions at key junctions, taken from recent Transport Assessments prepared for proposals for residential developments in Boston. Although the A52 / A16 Burton Corner junction is at or over its theoretical capacity, there is spare (significant in some cases) capacity at the other junctions identified.

Access by sustainable travel modes: The review of how the site is accessible by sustainable travel modes has shown there are a range of bus services that are served from many bus stops that are a short walk from the site, providing direct links to the town centre and the Railway Station. The site is also well connected to a network of footways and signed cycle routes in residential areas that are relatively lightly trafficked. In particular, there is a Public Right of Way (PRoW) that crosses the site east-west between the parcel of land to the west (which is currently subject to a planning application) and Rochford Tower Lane. The PRoW is retained in the Indicative Landscape Framework and Development Concept Plan. There is also a PRoW on the western boundary of the site between Blackthorn Lane and Eastwood Road.

Access to local amenities: The review shows that the site is located within a reasonable walking distance to a large number of local facilities, particularly for the first phases of the build-out prior to

the local shops and services being delivered on-site. Therefore, the site will be as sustainable as possible from the outset. Indicative Landscape Framework and Development Concept Plan An Indicative Landscape Framework and Development Concept Plan has been prepared for the Phase 1 site and the full build-out of the site and includes the following transport infrastructure: Three vehicular accesses. It is envisaged Phase 1 will be served by a priority junction from the A52 Wainfleet Road, any further phases will require a main access (shown as a roundabout) also on the A52 Wainfleet Road, connecting to a central spine road and for later stages of the build-out, a third additional access onto Rochford Tower Lane. All site accesses can achieve the desired visibility splays; The provision of high quality pedestrian and cycle links through the site and connecting to the existing network, allowing for safe, direct and quick links to existing local facilities such as shops, services and schools and the town centre for employment and the Railway Station for links to employment locations outside of Boston. The proportion of residents already living in the vicinity of the site that walk or cycle to work is significantly higher than bus travel and therefore these proposals will need to be a primary consideration in the further development of the Masterplan. In particular, these links will be provided from Phase 1 onwards, so the development will be as sustainable as possible from the outset; For the full build-out, the internal highway network will be designed to facilitate access by bus, ensuring all residents are within 400m of a bus stop. Through discussions with LCC and local bus operators a strategy will be identified to exploit existing bus services to serve the establishing and growing settlement in the short term and the potential long-term strategy of implementing a bespoke service focussed on attractive and frequent journey times between the site and Boston town centre, with an emphasis on ease of access for onward journeys. Traffic generation: An initial analysis of trip forecasting and traffic distribution and assignment based on the total number of dwellings in each scenario. Although trip forecasting of the additional shopping, services, leisure and education facilities that would form part of the overall scheme, have not been identified (as the specific uses are not yet known), the number of primary vehicle trips generated by these uses is likely to be minimal. The majority of vehicle trips to and from the uses will either form part of a home-based to and from work or pass-by trips on the A52. Impact on the local highway network: Although no formal assessment has been undertaken in terms of

identifying the specific impacts on the traffic associated with a residential development at the site, using the initial trip forecasting and traffic distribution and assignment, an estimate of the additional vehicle movements at key junctions in the vicinity of the site and on the Boston Inner Relief Road has been shown for Phase 1 and the full-build out of the site. Junction improvements: Using existing information on the baseline operating conditions at key junctions in the vicinity of the site and on the Boston Inner Relief Road, the likelihood of the vehicular impact of Phase 1 and the full-build out of the site requiring improvements to these junctions has been identified as follows: For Phase 1, minimal mitigation with only the A16 Sibsey Road / A52 Wainfleet Road / A16 Spilsby Road (Burton Corner) mini-roundabout identified with a medium to high likelihood. The improvements to the junction required are likely to be relatively minor to ensure the baseline operating conditions maintained or improved upon. Therefore, 200 dwellings at the site can be delivered quickly, with minimal low-cost intervention; and For the full build out, further improvements would be required to A16 Sibsey Road / A52 Wainfleet Road / A16 Spilsby Road (Burton Corner) mini-roundabout, which is likely to be a major scheme such as upgrading to a signal controlled junction. Four other key junctions along between Burton Corner and the junction with the A52 west have been identified with a medium to high likelihood of requiring improvements. These could range from local widening, further optimisation of existing signal timings, the introduction of traffic signals or the full reconfiguration of a junction. Additional mitigation: The forecast vehicular impact of the full build-out of the site will not only be on the capacity at junctions, but other perceived detrimental effects such as severance on routes with low levels of traffic currently, which will need to be off-set to ensure the proposals can be considered acceptable. Therefore, in addition to the potential junction upgrades, a number of other measures are likely to be required such as pedestrian crossing facilities, traffic calming measures and routing restrictions. Overall the Preliminary Transport Assessment concludes that site Fis017 has the potential to accommodate a residential development of up to 1,600 dwellings on a site that is conveniently located to the existing sustainable transport network in Boston and is within a short walking or cycling distance to a range of local amenities, the town centre and the Railway Station. The Assessment highlights that the development would be easily connected to this network, in order to maintain the high level of

sustainable travel already undertaken in the local area and a range of local facilities will be provided on-site to further reduce the need to travel and therefore minimising the impact on the wider network. As such, and subject to further detailed analysis and appropriate mitigating works the Assessment finds that the development would be fully implementable. Landscape and Visual Impact A Landscape and Visual Appraisal (LVA) of the site is submitted with the representation (Appendix K). The LVA concludes that given the nature and character as well as visual qualities of the adjacent settlement, it is considered that the site has the capacity to accommodate change. The appraisal states that there are a limited number of constraints or issues in landscape and visual terms that reduce the site's capacity to accommodate development. The appraisal considered that the characteristics of the existing built form as well as the opportunities to provide mitigation will ensure that the impacts of any such development on the wider landscape can be minimised. The appraisal states that the site has capacity to accommodate development given the existing properties in Boston located along Eastwood Road, Wainfleet Road (A52) and the western boundary of the Site, there would be little change in the visual perception of the urban edge of Boston if the potential development used a sensitive design approach that worked to enhance the existing townscape character of the immediately adjacent area of Boston. The LVA provides a number of recommendations if the site is to be developed, which could be included in a detailed policy that allocates the site. The LCA provides a separate summary with regard to site Fis017a. The appraisal concludes that due to the small size of this parcel, its proximity to the settlement edge of Boston and its low visual prominence in relation to the surrounding landscape, there are very few potential landscape and visual constraints associated with the development of this parcel and development could comfortably be integrated into the existing setting, with limited changes to the baseline condition or the landscape and visual resources. The appraisal goes on to state that there is scope to mitigate any potential landscape and visual impacts by adopting a sensitive design approach that respects the proximity of the parcel to the existing settlement edge of Boston and introduces planting, including street trees to help integrate the development and soften its appearance and provide visual amenity for residents. Overall, it is therefore considered that the site can accommodate residential development without a significant detrimental impact on landscape or visual

considerations. Flood Risk and Drainage The Environment Agency flood maps indicates that the site is within flood zone 3, alongside the majority of Boston (see fig 3). The emerging plan takes a precautionary approach to flood risk however it also recognises that the Boston urban area will continue to be an area of choice for most residents to live in. The Boston Barrier (anticipated to be completed by 2020) is expected to be of huge benefit to the viability of new development in Boston and the role of the town as a Sub-Regional Centre. It is noted that both Wes002 and Sou006 both lie within Flood Zone 3 and are proposed to be allocated for residential development by Boston Borough Council. BSP Consulting has provided a preliminary flood risk and drainage strategy to accompany the representation (Appendix L). The report highlights that average site levels may need to be raised to between 3m and 3.5m AOD. In addition, there may be the need for flood resilient construction and the provision of demountable flood defences for each property to reduce any risk of flooding from fluvial and tidal flood risk; surface water flood risk; flood risk from ground water; and flood risk from sewers and infrastructure. The report highlights that surface water run-off from the site is currently drained into Witham Fourth Drainage Board (WFDB) drains on the western and eastern boundaries of the site. Anglian Water has an adopted system of foul and combined sewers draining to a series of pump stations prior to discharge away from the area via pump mains. In terms of the proposed surface water drainage strategy the report anticipates that the method of surface water disposal will be via sustainable urban drainage systems (SuDs) prior to discharge into WFDB drains. WFDB have indicated that their preferred point of connection would be to the Cowbridge Drain approximately 1km. To the north of the site. This route would need to be the subject of further discussion with WFDB and would be dependent on land ownership(s), levels etc. Notably, however, the land to the north of Wainfleet Road is also under the ownership of Mr R Hardy/Richard Hardy (Fishtoft). Should this route be practicable then it would offer a degree of improvement to the local drainage systems insofar as any water from the development would be routed away from Boston town centre. The report notes that should this route not be achievable then connection to the existing drains within the site should be permissible subject to a flow rate of 1.4 litres per second per hectare. This would necessitate the provision of flow storage, probably in the form of pond(s), and flow control device(s). BSP estimate that the required attenuation ponds for

Fis017a would require a land take in the order of 0.6 ha that could be provided in the form of interlinking ponds with a single point of outfall from the site. Potential outfall positions (which will be subject to approval from WFBD) have been marked up on the drawings in Appendix A of the Preliminary Flood Risk and Drainage Strategy. The report highlights that the WFDB drains will require a clear distance of 9 metres from the top of banks, for maintenance purposes. The abovementioned proposals have been incorporated into the Indicative Landscape Frameworks and Development Concept Plans for both Fis017 and Fis017a. In terms of the proposed foul water drainage strategy, BSP envisage that the proposed residential development will be drained via gravity pipelines into pumping station(s) which will then drain into the surrounding adopted foul water infrastructure. There may also be an opportunity to drain part of the proposed site into the existing foul pumping station off Fernleigh Way. Potential outfall positions (which will be subject to approval from Anglian Water) have been marked up on the drawings in Appendix A of the Preliminary Flood Risk and Drainage Strategy. Over the Preliminary Flood Risk and Drainage Strategy concludes that the site is likely to be suitable for residential development subject to appropriate mitigation measures being adopted.

Ecology and Trees
There is limited vegetation across the site. The field boundaries are not defined by hedgerows and there is limited trees and hedgerows to the site boundaries. There are not known to be any protected species or habitats on the site, although confirmation would be subject to an ecological appraisal at the planning application stage. As such there are no known ecological constraints that would prevent development coming forward at the site. On the contrary it is considered that the site, once developed can accommodate substantial blue and green infrastructure that will provide net gains in biodiversity in accordance with the aspirations of the Framework (paragraph 109).

Heritage and Conservation
There are no designated heritage assets within the site boundary and the site is not located within or close to a Conservation Area. The Boston Conservation Area lies approximately 800m west of the site's western boundary. There are two Listed Buildings close to the eastern boundary of the site, namely: Rochford Tower House (list entry number: 1147502); and Rochford Tower (list entry number: 1062088). Rochford Tower is also listed as a Scheduled monument (list entry number 1016693). Rochford Tower House and Rochford Tower are located on the east side of Rochford Tower Lane and the highway offers a degree of separation

between the site and the listed structures. Furthermore, although the upper parts of Rochford Tower are visible from the site, it is largely screened by mature vegetation and trees that surround it. In this regard, views from the Tower are more apparent from the wider landscape to the east, generally in views looking towards the settlement. Furthermore, the listed structures are adjacent to existing modern development, namely Boston Bowl which is currently being extended. The Indicative Landscape Framework and Development Concept Plan for Fis017 demonstrates that the development of the site can respect the setting of the listed buildings by retaining adequate separation spaces and off-set distances. Any limited views of the tower can be retained. Likewise views of the Boston Stump (St Botolph's Church) which is a prominent feature in the existing skyline, can be maintained both in long views from Wainfleet Road (A52) approaching the settlement, as well as in key views on site, including by creating specific vistas that retain the dominance of the Stump. As such it is not considered that the development of the site would have a significant detrimental impact upon any designated heritage asset. There is therefore not known to be any heritage constraints to the development of either Fis017 or Fis017a. Archaeology An Archaeological Evaluation of the site has been undertaken on the site and is attached at Appendix M. A total of eighty-six trial trenches dispersed across the site were excavated. Almost half were targeted on possible archaeological features identified during the geophysical survey to allow for information on their nature and preservation to be determined. The rest were located in areas not subject to detailed geophysical survey. The archaeological investigations identified two main foci of archaeological potential along with several more isolated features. The main focus of activity was in the northernmost part of the site where settlement dating from the late 11th century to at least the 16th century was recorded. The archaeological evidence at the site has suggested that the origins of the medieval settlement of Fenne can be pushed back at least two centuries prior to what was originally documented, to the late 11th and early 12th century. The archaeological remains in many cases are well preserved and there is potential for further study and enhancement of our understanding of occupation of this area during the post-conquest period. The second area of interest is in the southern part of the site, where a cluster of undated features including ditches, gullies and postholes was identified. The report concludes that it is unclear from the excavated trenches as to whether these features are

representative of small scale settlement or agricultural practices. It is not considered that the findings of the Archaeological Evaluation will prevent development on the site, but will be used to inform any further investigation and subsequently inform the design of any future residential proposal. Land Contamination There are no known contamination constraints that would form an insurmountable barrier to the delivery of this site. Capacity An indicative Landscape Framework and Development Concept Plan has been prepared for both Fis017 and Fis017a. The plans demonstrate that Fis017 can accommodate 1336 dwellings along with associated landscaping, sustainable urban drainage, public open space/play facilities, education and shops/community facilities. As such Fis017 has the capacity to accommodate a number of infrastructure items that would benefit Boston as identified by the SPRU review of the IDP. Fis017a can accommodate 195 dwellings together with associated landscaping, sustainable urban drainage and public open space/play facilities. The above capacities are based on a net density of 30 dwelling per hectare which is considered to be commensurate with the surrounding residential development. Availability Mr R Hardy and Richard Hardy (Fishtoft) are the registered owners of all the land being promoted through this representation (Fis017 and Fis017a) and are committed to delivering development on the site as soon as possible. Suitable The assessment in this section of the representation demonstrates that the site is not unduly constrained in terms of access, landscape and visual considerations, flood risk, ecology or heritage. This is in contrast to site Sou006 which is a proposed allocation and is likely to have major negative effect in terms of heritage. The site is located adjacent to the existing urban area of a sustainable settlement which has been identified as a location for growth. Unlike Wes002, which is another proposed allocation, the site relates well to the existing settlement and would form a logical extension to the settlement. The site would have access to a wide range of services and facilities that would be accessible by sustainable modes of transport. The site is therefore considered suitable for residential development. Achievable/Deliverable The site is a greenfield site on the edge of the urban area. There are no known development constraints requiring extensive mitigation, other than flood risk which is a common factor to all sites around the Boston urban area. In this regard, sites of a similar flood risk have been proposed for allocation as Sustainable Urban Extensions (Sou006 and Wes002). The site is therefore considered to be achievable in terms of viability. The

Post Title: 01: Boston

site is not constrained by ownership issues and the landowners are keen to pursue development at the site and are in ongoing discussions with housebuilders. The site is therefore considered to be realistically deliverable within the next plan period. In particular, site Fis017a is considered to be deliverable early within the plan period. Pursuit of Sustainable Development National Planning Policy Framework Paragraphs 150 through to 155 set the context in which Local Plans should be prepared; principally this is with the objective of contributing to the achievement of sustainable development (paragraph 151). It goes on to state that they should be consistent with the principles and policies set out in this Framework. Including the presumption in favour of sustainable development. The achievement of sustainable development is expanded in the following paragraph at 152, stating: Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce, or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measure to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. The Presumption in Favour of Sustainable Development It is inevitable in the preparation of a Local Plan that a balance will need to be reached in the pursuit of one or more strands of sustainable development, or indeed the overall balance to be reached (as set out in paragraph 152). Therefore, the tensions of each of the 3 strands of sustainable development (social, environmental and economic) and the various options available (set in a sustainability appraisal) to a Council in achieving them will need to be reconciled by the decision maker that require an often-extensive range of judgements. Paragraph 14 of the Framework sets out the balance in which the decision maker must reach in considering the most appropriate strategy; the presumption in favour of sustainable development. Table 2 below [provided by email format does not allow uploading to website] summarises the sustainable nature of the land south of Wainfleet Road (Fis017) for residential development, having regard to the three dimensions of sustainable development; economic, social and environmental identified at paragraph 7 of the Framework. In particular, the table will demonstrate how development of the site would contribute to sustainable development having regard to the Government's view of sustainable

Post Title: 01: Boston

development which is outlined in paragraphs 18 to 219 of the Framework. SA of site It is clear from the previous sections in this report and the SPRU SA review that Site Fis017/Fis017a has no likely significant negative effects and has several sustainable credentials. Where issues have been identified these can be easily mitigated as part of the development proposals.

Response Number	541	Respondent Number:	2642	Comment Author:	Bruce Mather Ltd	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:	1	The Environment impact where the council have stated in the SHLAA April 2017 "would create an outlier of development in an area with a strongly rural character, to the detriment of that character" is against the Council's previous planning decision, Application Reference B/04/0112, to GRANT Outline Planning Permission for the area to be used for Industrial Development incorporating Light Industry (Class B1), General Industry (Class B2) and Storage and Distribution (Class B8). The Council's stated reason for Granted Planning Permission for Industrial Usage was "will not harm the amenities of local residents, the character of the area or cause any adverse highway conditions and therefore conforms with Policies G1, G6 and ED1 as contained in the Boston Local Plan". The current assessment contradicts the Council's previous assessment and decision to grant planning permission.	The adopted Boston Borough Local Plan (April 1999) identifies this land as part of a much larger 'Proposed Industrial/Commercial Area - i.e. it allocates it (and land to its north and east) for employment use. In that context, the granting of planning permission for industrial development was entirely appropriate. However, it is not accepted that the fact that the land was previously allocated for employment use (and planning permission was granted for industrial use) is relevant to the consideration of the land as a potential housing site.		No change to the Local Plan is required.		
Site Allocation Number:	Wyb026	<p>Do you consider that this part of the Local Plan is</p> <p>Legally Compliant <input type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:				The South East Lincolnshire Strategic Housing Land Availability Assessment (April 2017) (SHLAA) identifies that site Wyb026 is unsuitable for residential development because it is unrelated to the town's built-up area, and its development would create an outlier of development in an area with a strongly rural character, to the detriment of that character. It is considered that this assessment is entirely appropriate, and that the site should not be identified as a Housing Allocation.					
Proposed changes to make compliant or sound:	To proceed with the original planning assessment and maintain consistency for the area to be developed as per the Grant of the original planning permission.								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 02: Spalding and Pinchbeck

Response Number	237	Respondent Number:	2780	Comment Author:	scparker	Client		Web Link		
Paragraph Number:		Table/Figure:		Comment Content	<p>Pin008 is in a conservation area. Building 13 units is not in keeping with conservation. 13 units is far to excessive and I object to any further housing on this land. The field overlooks our field and we believe there may be bats nesting in the old pub building. Further, the deer that go on our field will disappear as a result of the building works and subsequent inhabitants as the increased noise level will deter the wildlife. The owl living at the end of our field is also going to disappear as a result of the building works and increased habitation noise. I don't see how any of these factors are positive to conservation in the area. There are drainage issues surrounding this area which will need further investigation and resolving. In terms of suitability, the land should be used as a recognised greenfield area and within the conservation it should be requested the landowner does exactly that and is respectful to the nature within. I have not been consulted about any of Pin008; especially considering it shares a boundary with my land. I encourage greater communication and consultation going forwards.</p>			Officer Comment:	<p>The Pinchbeck Housing Paper (January 2017) does not allocate Pin008 for housing development. The site contains a disused public house and is brownfield land therefore it is appropriate that the site remains within the settlement boundary of Pinchbeck. Comments made in relation to protected species, biodiversity and drainage are noted. The site is not identified as a wildlife site or as an open space because it is brownfield land containing a former public house. Should the site come forward for housing development it may be possible to secure some open space as part of the scheme. There have been three previous consultations for the South East Lincolnshire Local Plan, which have been publicised extensively in the local area and local media. Unlike for a planning application there is no duty upon the Local Planning Authority to directly consult adjoining/affected properties.</p>	
Policy Number:		Map Number:		Site Allocation Number:	Pin008	Officer Recommendation:	<p>No change to the Local Plan is required.</p>			
<p>Do you consider that this part of the Local Plan is</p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input type="checkbox"/></p>		<p>Do you consider that the Local Plan is unsound because it is not:</p> <p>Positively Prepared <input checked="" type="checkbox"/></p> <p>Justified <input type="checkbox"/></p> <p>Effective <input type="checkbox"/></p> <p>Consistent with national policy <input checked="" type="checkbox"/></p>		<p>Compliant, Sound, Duty to Cooperate explanation:</p> <p>Proposed changes to make compliant or sound:</p> <p>Participate in Examination: <input checked="" type="checkbox"/></p> <p>Why wish to participate</p>		<p>I have put the reasoning in my answer above.</p> <p>I am not sure what this is, but if it relates to consultation about land bordering my own, which will have a significant and detrimental effect on my land then yes, I require oral discussion/consultation.</p>				

Post Title: 02: Spalding and Pinchbeck

Response Number	335	Respondent Number:	1238	Comment Author:	Pedals	Client		Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:		Map Number:	2	<p>There is an error on Inset 2: the cycle route from Two Plank Lane alongside site Pin045 and along Market Way to the B1356 is shown as a "Proposed Cycle Route" whereas it has existed for many years.</p> <p>Inset Map 2 shows an existing cycle route extending northwards from West Elloe Avenue to Enterprise Way. This is an error because no such route exists at present. If this is a drafting error, and should have been marked as a proposed cycle route and included in the list of routes in Policy 29 C2, then we will support the proposal.</p>	<p>The error relating to the appropriate designation of the cycle route running along Two Plank Lane/Blue Gowt Lane/Market Way is accepted.</p> <p>The Local Plan to be changed as follows: Amend Inset Map No.2 by redesignating the 'Proposed Cycle Route' along Two Plank Lane/Blue Gowt Lane/Market Way as a 'Cycle Route'.</p> <p>Change notation for West Elloe Avenue and Enterprise Way from Cycle Route to Proposed Cycle Route. Add 'vi. Along West Elloe Avenue and Enterprise Way, Spalding'</p>		<p>Minor modification - Further consideration of this matter will be necessary as part of the Examination.</p>		
Site Allocation Number:		<p><i>Do you consider that this part of the Local Plan is</i></p> <p>Legally Compliant <input checked="" type="checkbox"/></p> <p>Sound <input type="checkbox"/></p> <p>Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/></p>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	<p>1. On Inset Map 2, replace the "Proposed Cycle Route" notation from Two Plank Lane alongside site Pin045 and along Market Way to the B1356 with the "Cycle Route" notation. On Inset Map 2, replace the "Cycle Route" notation on the B1356 between West Elloe Avenue and Enterprise Way with the "Proposed Cycle Route" notation.</p>								
Participate in Examination:	<input type="checkbox"/>								
Why wish to participate									

Post Title: 02: Spalding and Pinchbeck

Response Number	350	Respondent Number:	935	Comment Author:	Longstaff	Client		Web Link	
Paragraph Number:	3.2.2	Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	2	Map Number:	2	Planners have proposed to include sites Stm 004/010/028 - sites that are immediately adjacent and opposite to the site Stm 006, as suitable housing sites for the Local plan period 2011-2036. Including site Stm 006 would complete a logical boundary start line for the development at the southern edge of the town. From a Flood risk point, the Flood Hazard and Flood Depth maps for the areas to the immediate north and west of site Stm 004 are very similar to the subject site, and therefore there is some doubt that there is a greater flood risk on the subject land, and the robustness of the FRA analysis is questioned. The site Stm 004 has recently had Outline Planning consent granted (subject to the completion of a S106 agreement), and therefore there is precedent of the location being sustainable. In summary the development of site Stm 006, together with the adjacent proposed housing areas could be immediate, and does not require the costly provision of a railway crossing and further extensive road infrastructure. If these southern areas are developed in conjunction with the southern Holland Park proposed infrastructure provision (the southern section of the Spalding Western Relief Road), this will provide housing close to the existing A16 Bypass to all directions, north, south, east and west.	The comments relating to the similarity of circumstances between Site Stm006 and Site Stm004 are noted, but the crucial determining factor in this case is the risk of greater flood depth that applies to Site Stm006.		No change to the Local Plan is required.		
Site Allocation Number:	Stm 006								
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input type="checkbox"/>						
Sound	<input type="checkbox"/>	Justified	<input checked="" type="checkbox"/>						
Prepared in accordance with Duty to Cooperate	<input checked="" type="checkbox"/>	Effective	<input checked="" type="checkbox"/>						
		Consistent with national policy	<input type="checkbox"/>						
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	Site Stm 006 should be included as a Housing allocation site								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	To test the robustness of the FRA analysis,.								

Post Title: 02: Spalding and Pinchbeck

Response Number	415	Respondent Number:	1835	Comment Author:	Robert Doughty Consultancy Ltd	Client	Ms M Edwards and Mr M Scotney	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Officer Comment:		Officer Recommendation:		
Policy Number:	12	Map Number:	2	The site PIN057 has put forward as part of the Urban Extension to the north of Spalding. The inclusion of this site would allow for a more comprehensive and sustainable urban extension scheme, with wider ranging links to the services of the surrounding settlements, and would not result in a development dependent entirely on the SWRR road scheme. As several parties have previously pointed out there will be no opportunities for new vehicular links between the urban extension and Spalding itself. The importance of maintaining the individual characters of Spalding and Pinchbeck, despite their physical proximity, is a policy aim of the Local Plan. Inclusion of this site as part of the allocation, in preference to land further east, would help deliver the overall quantum of housing and serve to maintain the perception of a gap between the two settlements. This factor does not appear to have been considered by the Planning Authority, because the only justification for rejecting this site in the response is that the coalescence of Pinchbeck and Spalding is regarded as an inevitable consequence of securing the delivery of the ...SSWR which disregards the opportunity to deliver the housing and also reduce the perceived coalescence of Spalding and Pinchbeck. No consideration of the wider role, function and sustainability of the urban extension appears to have taken place. The landowner has not, at any time, been party to any of the discussions regarding the proposed urban extension, which leads us to conclude that the scheme has had little background preparation, alternative options have not been actively considered and as such the Urban Extension will have limited chances of being built out.		Further to the response to the representations made in respect of the Preferred Sites for Development consultation document, the importance of maintaining the individual characters of Spalding and Pinchbeck, despite their physical proximity, is not a policy aim of the Local Plan. However, it is necessary to allocate Site Pin045 for residential development in order to fund the first phase of the Northern section of the SWRR. The inclusion of Site Pin057 within the Vernatts urban extension is not necessary for the purpose of creating housing capacity given the extent of Site Pin024.		No change to the Local Plan is required.	
Site Allocation Number:									
Do you consider that this part of the Local Plan is Legally Compliant <input checked="" type="checkbox"/> Sound <input type="checkbox"/> Prepared in accordance with Duty to Cooperate <input checked="" type="checkbox"/>		Do you consider that the Local Plan is unsound because it is not: Positively Prepared <input type="checkbox"/> Justified <input checked="" type="checkbox"/> Effective <input checked="" type="checkbox"/> Consistent with national policy <input checked="" type="checkbox"/>							
Compliant, Sound, Duty to Cooperate explanation:									
Proposed changes to make compliant or sound:	The Local Planning Authority should provide more evidence regarding the process undertaken in developing the concept of the Spalding Urban Extension, including discussions with relevant landowners, stakeholders and consultees. This will justify the decision to allocate the site and demonstrate that the urban extension, and the associated infrastructure, will come forward in the lifetime of the plan, whilst also ensuring that appropriate land holdings are included in the allocated site.								
Participate in Examination:	<input checked="" type="checkbox"/>								
Why wish to participate	We consider that it is necessary to participate in the oral part of the Examination in Public to								

Post Title: 02: Spalding and Pinchbeck

Response Number: 458 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: 2 Site Allocation Number: Mon005

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

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.

Spalding: Broadgate has extensive land interests in Spalding including the planning permission (now under construction) that has already been secured to the south West of the town for 2,250 dwellings at Holland Park. This development is now well under construction, and has already seen extensive investment into infrastructure.

Mon005: Collectively, the sites north of Bourne Road relate to one another. However, Site Mon 005 off Horseshoe Road (yield 88 dwellings) is a random and isolated location for development that would appear sporadic and would consolidate the ribbon development to the West. It also has no natural Western boundary. This would lead to a development that would be out of character and harmful to the immediate landscape and the wider landscape setting of the town. There are better located sites Within the Corridor of the SWRR that can be developed comprehensively on a properly planned basis. This allocation if retained should not proceed until a suitable contribution and phasing programme for the SWRR has been agreed. Where sites are contributing to the forward-funding of the relief road, it is important they are doing so in a level marketplace, where development costs are equal, otherwise sites that fail to contribute will be unfairly advantaged. This will ultimately delay housing delivery.

Broadgate also seeks the increase in the housing yield in the Holland Park phase of the development from 2250 to 2600 dwellings. Broadgate also seeks the later phasing of allocations at Mon 005 and other Spalding allocations in order for the prioritisation of more strategic sites that can deliver key components of the highway strategy serving the district.

Given multiple land ownership alone (there could also be access issues with the smaller sites), the level of uncertainty of the above Mon sites coming forward on a properly planned basis and crucially, ensuring the provision of the appropriate stage of the WRR, is significant. Without the timely and phased provision of the WRR there is a danger that existing development already permitted and progressing, such as Wygate Park, will suffer because of the lack of proper highway infrastructure

With respect to Site Mon005, it is not accepted that it is a 'random and isolated location for development'. It also has a 'natural western boundary' in the existing small residential development fronting Horseshoe Road. Given the recent housing developments to the east of the site, the ongoing work on the Holland Park scheme and the longer-term proposals for significant development to the west of Spalding, it is not accepted that the development of the site in question would be out of character and harmful to the wider landscape setting of the town. Given the current provisions of the emerging Local Plan Policy 30: Delivering the Spalding Transport Strategy, Site Mon005 will make a proportional financial contribution to one or more projects identified in the Spalding Transport Strategy. The proposed intensification of the Holland Park scheme is noted. As only Sites Mon005 and Mon008 are proposed for development in the emerging Local Plan, it is not considered that there are any immediate highway infrastructure issues pending identification of any access points onto the SWRR between the bridge crossing of the Vernatts Drain and the junction with the A151 Bourne Road.

No change to the Local Plan is required.

Post Title: 02: Spalding and Pinchbeck

Response Number: 535 Respondent Number: 1187 Comment Author: Spalding and District Civic Society Client: Web Link:

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

Policy Number: Map Number: 2 Site Allocation Number: 1. The Plan cannot be sound, as Inset Map 2 is inaccurate. The recreational open space marked Playing Field (top right of enlarged section) is still not coloured green. 2. The Plan is not legally compliant or sound as it neither complies with nor is consistent with the NPPF: Paragraph 14, bullet point I - For plan making local authorities should positively seek opportunities to meet the development needs of their area. Spalding has a 44% deficit of green recreational space (South Holland Local Plan 2006, Ch.7); it has significant brownfield sites. Neither map nor text makes any attempt to identify possible sites to make up the existing deficit of recreational space or the brownfield sites and their preferred use. Thus, the Plan is not positively prepared. It is not possible to propose land for recreational space, the delivery of which cannot be demonstrated. Policy 2: Spatial Strategy makes provision for any brownfield sites lying within the designated settlement boundaries of Sub-Regional Centres, Main Service Centres, Minor Service Centres and Other Service Centre and Settlements to be considered for development that supports their respective role in the settlement hierarchy, helps sustain existing facilities or helps meet the service needs of other local communities. The Local Plan has been positively prepared and includes in its evidence an assessment of the need for open space and recreation space. The Plan also has HRA and SA reports which have informed the evolving policy making and site allocations. Where brownfield land development has been promoted through the SHLAA it has been positively considered in the Local Plan. It is also the case that where brownfield sites lie within settlement boundaries they will also be positively considered for development should landowners or developers bring them forward. The assessment of open space for the 2006 South Holland Local Plan has been superseded by the South East Lincolnshire Local Plan. It is asserted that the Local Plan meets the sustainable development needs of the plan area and is both sound and positively prepared. 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:

1. Colour the specified recreational open space green
 2. Identify a) the sites possible to make up the existing recreational open space deficit, an b) the brownfield sites and their preferred use.
 A) Suggested sites: former Gas Works site (to be linked to the Castle Playing Field and the ungreened Playing Field above?), reinstated Swimming Pool area (after swimming pool is incorporated in newbuild leisure centre at Castle Field), north end of Cowbit Wash.
 B) Sites: former Welland Hospital and Bettinson's Garage, Bull and Monkey, former Sorting Office, former Auction Hall site immediately north of Sainsbury's roundabout, Adam's Car Park (between Market Place and the Crescent).

Participate in Examination:

Why wish to participate

Post Title: 02: Spalding and Pinchbeck

Response Number	552	Respondent Number:	988	Comment Author:	Hume Planning Consultancy Ltd	Client	Broadgate Homes Ltd & Broadgate Builders (Spa	Web Link	
Paragraph Number:		Table/Figure:		Comment Content	Broadgate also seeks the increase in the housing yield in the Holland Park phase of the development from 2250 to 2600 dwellings. Broadgate also seeks the later phasing of allocations at Mon 005 and other Spalding allocations in order for the prioritisation of more strategic sites that can deliver key components of the highway strategy serving the district.		Officer Comment:	The comments are noted.	
Policy Number:		Map Number:	2				Officer Recommendation:	No change to the Local Plan is required.	
Site Allocation Number:									
Do you consider that this part of the Local Plan is		Do you consider that the Local Plan is unsound because it is not:							
Legally Compliant	<input checked="" type="checkbox"/>	Positively Prepared	<input 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:	The suggested amendment is an increase in the site's capacity from 1250 dwellings to 1600 dwellings (Addressed in paragraph 4.12)								
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 timescales for housing development.								