

Post_title: **4.0 Policy Context**

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 385 comment_author: Mrs A Mosek

comment content:

Section 4: I was surprised and disappointed to see so little mention of skills. There is a huge need to improve skills levels of local people in order to address skills shortages and also to increase productivity and achieve economic growth within the region. It would have been good if discussions had taken place with Boston College on this subject. We work with significant numbers of local employers and are very aware of the impending skills shortage crisis which is holding back economic growth in the county. For example at the College we are keen to create an agri-STEM centre to support the development of engineering and manufacturing and science skills. We see this as potentially supporting local employers and also encouraging more young people to train for local employment and stay rather than move away. This will support economic growth. There is no mention that I could see of Greater Lincolnshire Local Enterprise Partnership (GLLEP) which I was very surprised about. GLLEP will be in control of much of the finance coming into the area and South-East Lincolnshire should be seen to be trying to position itself to take full advantage of any such funding. There are no links to the LEP's priority sectors or mention as to how south-East Lincolnshire is going to support these priorities. I think these need to be considered as we need to be seen to be supporting the Greater Lincolnshire agenda and positioning ourselves to make the most of funding which will be directed to priority sectors. The College is keen to be involved to strengthen the plan if you think we could be of help.

Officer Comment:

Section 4.0 covers a wide remit, aiming to address a wide range of key employment issues. It is acknowledged by the Local Plan that improving skills of local people is important to help diversify the local economy and stimulate economic growth. Paragraph 4.0.4 states that the 'long term strategy for the area is to diversify the local economy and jobs market ...to encourage more skilled employees to live and work in the area' while 4.1.3 highlights one of the benefits of the policy approach is to up-skill the local labour force. 4.1.13 adds that the identification of Prestige Employment Sites can help attract high-skilled and high value employment to the area, which is a priority. Although the GLLEP are not mentioned directly, the Greater Lincolnshire Strategic Economic Plan produced by the GLLEP is (para 4.0.5) and has informed the development of Policy 7. The policy enables development in the LEP's priority sectors, such as agri-food at the Holbeach FEZ although it is accepted that these are not referred to specifically.

Officer Recommendation:

Add reference to the GLLEP and their strategic priorities in the supporting text to Policy 4. Add new policy relating to the visitor economy (one of the GLLEP's priorities).

ID1: 386 comment_author: Mr John Stuart Birkett

comment content:

Para 4.0.5: Ambition for Boston seems to be lamentably low. The stated issues do not appear to question whether the employment forecasts should simply be accepted, or whether alternatively, measures might be taken to improve the attractiveness of Boston to employers in order to achieve a better balance in job creation between the north and south of the plan area.

Officer Comment:

The employment forecasts for the Plan Area (set out in the Employment Land Review) and are based on a generally accepted approach to identifying employment land requirements. Two scenarios use Experian and are considered to indicate the broad scale and direction of economic growth in different sectors and provide some indicators to help assess future land requirements. Two approaches are based on past development rates, provided by the two LPAs, based on completions in the area and are a good indicator of future land needs particularly in an area where land supply or demand has not been unduly constrained historically. The other scenario considered how many jobs and how much employment space would be needed to match forecast growth of the area's workforce. This uses projected levels of housing growth taken from the SHMA. This produced a range of outputs, and when local commercial agents views were taken into account, it was determined that the employment land requirement (and therefore jobs provision) is likely to reflect past development trends, but which should take account of likely housing and labour supply growth. This is equivalent to 75.3-82.3ha (when extrapolated to 2036). Policy 4 seeks to provide for a minimum of 82ha of employment land (the top end of the range). But the approach taken plans for a higher level of employment land to help South East Lincolnshire, including Boston, plan for an aspirational but realistic future; a continuous supply of employment land will be available to meet existing business needs and fulfil inward investment enquiries, which has not happened in the past. This approach should enhance the attractiveness of Boston to employers and help attract jobs, potentially higher

Officer Recommendation:

No change required.

skilled jobs to the area.

ID1:	387	comment_author: Spalding and District Civic Society	
comment content:	Officer Comment:	Officer Recommendation:	
<p>4.0.2 It is difficult to see how renewable energy generation can be regarded as a future economic strength, given the governments policy on on-shore wind farms and the increasing local hostility to solar farms (with their loss of prime agricultural land).</p> <p>4.0.4 Second sentence a non-sequitur. It is assumed a diversified economy + housing growth = more skilled employees living and working in the area. No, they won't not unless the housing development is of high quality and the town centre and its facilities actively enhanced. Without these they simply commute from Stamford and villages west of Bourne. Paragraph needs a caveat as above.</p> <p>4.0.5 (bullet point 5) and 4.1.7 (See next section)</p>	<p>The low carbon economy which includes renewable energy is seen as being is seen as being a growth sector for the Greater Lincolnshire area in the Stratgeic Economc Plan. It is not assumed that diversifying the economy and housing growth will attract more skilled people to the area, it is hoped that this approach will encourage this pattern of growth. Locating new employment in the higher tier settlements is recognised as being important; these are the most sustainable locations, with sustainable transport, new development there may lead to other enhancements, such as a new secondary school in Boston and Spalding for example.</p>	<p>Change renewable energy to low carbon economy.</p>	

Post_title: 4.1 Improving South East Lincolnshire's Employment Land Portfolio

ID1: 388 comment_author: Geoffrey Collins & Co

comment content:

The proposed Main Employment Area identified for Long Sutton comprises a very modest allocation off Bridge Road. The word piddling comes to mind. Compare this allocation to the substantial area allocated for Long Sutton in the Current Local Plan and comprising of several hectares. Moreover, compare the proposed allocation with the even greater substantial area allocated in the previous Local Plan. In short, the current allocation has been de-allocated. This important point is not mentioned at paragraph.1.2 of Statement. Having regard to the trifling Main Employment Area identified for Long Sutton, the phrase contained in the Statement diverse, prosperous, resilient and self-sustaining communities become meaningless. Ditto the phrase attracting new business and sources of employment . Ditto minimizing the need to travel by improving accessibility for all to jobs . The current Main Employment Area failed because of the cost of having to provide a ghost island on Bridge Road. The Main Employment Area contained in the previous Local Plan adopted in October 1998 was dead in the water from day one because it required a new exit off the Wisbech Road/A17 roundabout together with a new feeder road. As a result, new employment opportunities in Long Sutton over the last 30 to 40 years contained in the current and previous Allocations were never going to get off the ground. As things stand the vision for job creation in Long Sutton over the next 20 years is equally curtailed. What is needed is a more pragmatic approach. The current buzz word in Planning Departments is expedient . Forget refusing to consider warehousing, etc. in the Open Countryside (south of the A17 in the case of Long

Officer Comment:

The potential employment sites near Long Sutton (Bridge Road Main Employment Area and Princes/LC Packaging) covers 9.3ha, which is a slight decrease from the adopted Local Plan (12.2ha). It is therefore not accepted that this is modest allocation or that the proposals will not promote the identified national policy objectives. Since the adoption of the 1999 Local Plan national policy has changed significantly; allocated sites must be suitable, available and deliverable over the plan period. The potential employment sites reflected the availability of land in January 2016. The ELTP identifies that the previous allocations have not developed at the rate envisaged (for a variety of reasons) therefore promoting the same allocations may not help deliver sustainable development in Long Sutton over the plan period. However additional sites have been put forward to be considered for employment use in Long Sutton. The Highways Authority have identified that they have 'no concerns with the amount or type of uses proposed or the capacity of the local road network to accommodate such uses'. The land to the west of McDonalds has had consent for a garden centre (expired in 2010), and industrial units (expired 2014) suggesting that the demand for employment land in this location is not high. LO014 land to the east of Station Road: The Highways Authority advises 'The Station Road frontage of this site, to the north of the residential property, 'Prunus', is large enough and has sufficient visibility to be able to accommodate an access to serve the site. There would however be a significant impact upon nearby residential property. The site's Station Road frontage to the south of 'Prunus' is too close to the A17 roundabout to be able to provide safe access. Access

Officer Recommendation:

New site LO009 south of Bridge Road is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Employment Allocation. LO014 land to the east of Station Road is not one of the more suitable

Sutton). Allocate the land adjacent to the A17 and just south of the road in proximity to McDonalds which has a current or a recent Planning Consent for a Garden Centre. Allocate this land as a Main Employment Area and it will fly. Alternatively, the area of land we put forward in respect of the Current Local Plan just north of the A17 and adjacent to the Station Road roundabout (north east quadrant). There is sufficient land available at this location to create a suitable buffer between the A17 and the nearby single dwelling. A copy of our submission is attached and we now make a formal request that this land is given further consideration. The Site is the NE quadrant of the Station Road Roundabout and wraps around a dwelling called Prunus. It is being put forward for either: housing, light industry or a road related use such as: family pub/motel/adventure playground/golf range/private sports club/vehicle and agricultural machinery sales/garden centre. All services are immediately available, including disposal of surface water. The Divisional Highways Manager (in 1999) has indicated the frontage to Station Road/Cowpers Gate and north of 67 Station Road/Cowpers Gate is sufficient to accommodate an adoptable estate road.

from the A17 should ideally be avoided but if it should absolutely be necessary, it might be possible to have a left-turn in only off the A17 as a slip road near the roundabout with all egress onto Station Road to the north of 'Prunus'. It appears that an access could be achieved but that it might not be as straightforward as for other sites. The adverse impact upon residents of the adjoining property does not affect other sites in the same way.

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ID1: 389 comment_author: Mr D Bryant

comment_content:

Locally, in terms of our Local Plan, it is imperative that any future development be concentrated in those areas which are least likely to be of further detriment to existing traffic flows. Thus, it is right to identify land for future employment uses to the south of Boston, principally the Marsh Lane and Riverside Industrial Estate area, which has direct access to the A16 without adding to traffic numbers moving through Boston.

Officer Comment:

Support for the potential employment site at Riverside Industrial Estate, Boston is welcome.

Officer Recommendation:

No change required.

ID1: 390 comment_author: Mr & Mrs Hickling

comment_content:

I support keeping development for employment on Kirton village outskirts.

Officer Comment:

Support for the potential employment site at Kirton Distribution Park is welcome.

Officer Recommendation:

No change required.

ID1: 391 comment_author: Mr S Walton

comment content:

has submitted land that lies between Long Sutton and Little Sutton for residential or commercial development. It is between 64 and 90 Bridge Road and wraps around 74 - 82 Bridge Road. This is an implied objection to the settlement boundary for Long Sutton and Little Sutton and the approach taken by this policy

Officer Comment:

A significant area of land has been submitted by parcel: LO009 Land to the south of Bridge Road: The site's eastern frontage looks to be wide enough to accommodate a suitable access and there is suitable visibility in both directions. Bridge Road is the old A17 so is of a suitable standard to be able to accommodate the vehicular activity associated with a B1 B2 and B8 use on this site. LO009 would provide a cluster of employment uses, being in close proximity to the established Bridge Road Industrial Area and the Princes site. LO010: Land to west of Hundreds Lane: The northern part of the site could be satisfactorily accessed from Bridge Road. The southern part of the site to the south of the existing Hundreds Lane access to the food processing site has a 7.5 tonne maximum weight limit. Some substantial improvement works would be required on Hundreds Lane and potentially to the A17. LO011: Land to the east of Hundreds Lane: The new site to the south of the existing food processing site could be developed as an extension to the existing factory but there is a 7.5 tonne maximum weight limit on Hundreds Lane (to the south of the existing Hundreds Lane access to the food processing site). If access were to be formed there, some substantial improvement works would be required on Hundreds Lane and potentially to the A17. LO010 and LO011 would also have an adverse impact upon the countryside character of the area. Both sites are also likely to have significant opening up highways infrastructure costs, which would need to be borne by a developer. These sites are therefore considered to be undevelopable in this plan period.

Officer Recommendation:

New site LO009 south of Bridge Road is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Employment Allocation. LO010 Land to west of Hundreds Lane and LO011 Land to EAST of Hundreds

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ID1: 392 comment_author: Mr B J Smith

comment content:

I am also opposed to any heavy industry being sited on Wingland

Officer Comment:

Wingland is identified as an Existing Main Employment Area capable of accommodating the full range of B uses. The adopted Local Plan identifies the wider area as an employment allocation. However the take-up of employment land in this location has been slow and indications from the market suggest that the allocating the same site in the new Local Plan would be inappropriate. However, investment has been made in infrastructure and sufficient land should be identified to allow existing occupiers the opportunity to intensify operations. As such the SELAA identifies a smaller amount of land would be more suitable for an allocation over the plan period.

Officer Recommendation:

SB007: Wingland Power Station and SB014 Wingland Power Station B are some of the more suitable employment sites in South Holland and should be taken forward as Preferred Option Restricted Use Allocations.

ID1: 393 comment_author: King's Lynn Internal Drainage Boar

comment content:

The proposed employment areas to the east of the River Nene are within King s Lynn Internal Drainage Board s district. Hydrological modelling suggests that, as things stand, a number of sections of Board-maintained watercourses in this area would be at capacity, or potentially overtopped, during extreme rainfall/flow events. Any proposed developments in this area are therefore likely to have significant constraints in terms of how they can manage their surface water run-off, and it will be critical for any interested party to involve the Board in discussions about this issue at the earliest possible time.

Officer Comment:

Although drainage issues exist, it appears they are not insoluble and some employment development could take place, albeit will be critical for any interested party to involve the IDB in discussions at an early stage in the development process.

Officer Recommendation:

No change required.

ID1:

394

comment_author:

Brian Collins-McDougall

comment content:

The local community asked for the Windland industrial area to be re-classified as a green field site. Councillor Gambba-Jones advised the residents of Sutton Bridge that we should have done this when the last Local Plan was approved if we wanted to stop the inappropriate Biomass Incinerator. He gave this advice as Chair of the the Planning Committee on 17 April 2013 which gave planning approval to the Biomass plant. The approval was subsequently found to be unlawful and was overturned by the Planning Court at judicial review. Yet when the local community acted on Mr Gambba- Jones advice and requested that the area be re-classified in this consultation our wishes were ignored. The empty gesture of re-classifying only the small area of Windland that was formerly allocated to the Energy Park Sutton Bridge (Biomass Incinerator) as Countryside is mere tokenism. This was made clear at the exhibition at the Curlew Centre on 15 January 2015 when a council officer acknowledged that he thought it appropriate that a large gas fired power station be build in countryside. The reference was to the EDF B gas fired power station that has planning approval. The local community through its parish council formerly asked for the whole of Wingland to be reclassified. It is unacceptable to ignore the views of local people and the local plan should be altered to classify the Wingland area for agricultural use. The area is at high risk of flooding and not suitable for industrial development. As the incidence of extreme weather is increasing in the United Kingdom and the Government initiated a National Flood Resilience Review in January 2016. It is foolish to designate an industrial area on a high risk flood plain. The decision may well be challenged on the

Officer Comment:

The adopted Local Plan allocates 55.6ha of land for employment use at Wingland, the current proposal is for 7.6ha, it is therefore not accepted that de-allocating 48ha of land is 'tokensim' or that residents wishes have been ignored. The majority of the area will revert back to countryside, although sufficient land should be identified to ensure that existing businesses have capacity to expand or for new businesses to locate there. Although the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m' the Environment Agency does not insist on stringent mitigation for less vulnerable developments (i.e. keeping all potential flood water out of buildings) but looks for developers, in their supporting Flood Risk Assessments, to demonstrate how they will manage the risk and keep people (employees) safe. Therefore identifying this land for employment use is consistent with the EA's approach. The existing and proposed power stations were not identified on the Policies map as they are not classified as B Use development. However it is recognised that these are important land uses and help secure additional employment in the area so Policy 4 and the associated maps will be revised to incorporate power generating uses.

Officer Recommendation:

SB007: Wingland Power Station and SB014 Wingland Power Station B are some of the more suitable employment sites in South Holland and should be taken forward as Preferred Option Restricted Use Allocations.

grounds of prematurity. The maps on display at the Curlew Centre and Insert map 9 are out of date. They do not show existing buildings or the site of EDF B gas fired power station as it is in the countryside. The cut off point for these maps appears to be totally arbitrary as the most significant industrial development which will dominate the local landscape is omitted. A council officer explained EDF B was not shown because although it has planning approval and consent from the Secretary of State it might not be built. Yet other proposed developments are shown on the maps. An inconsistent and confusing methodology was used.

ID1:

395

comment_author: Mr Colin Massey

comment content:

BO005: I OBJECT to the de-allocation of this 25.2ha of employment land and to the allocation of 17.4ha of alternative land. The existing allocation has infrastructure provided to service it, which was provided at tax-payers expense, and that of some landowners. To de-allocate it is inconsistent with the reasons for its allocation in the first place. To now allocate land where landowners refused to contribute financially to the provision of infrastructure is totally contradictory to established policy.

Officer Comment:

The proposed 17.4ha of employment land at Riverside is not alternative land – this land is within the adopted Local Plan allocation. Marsh Lane was straightened and improved in 1996, and paid for by LCC and certain landowners. LCC confirm that 'land to the east of Heron Way, the site of the Waste Recycling Centre and land to the north of Recycling Centre were subject of the S278 agreement. LCC did receive payment from this landowner under a contract they had willingly entered in to. The plan attached to the agreement shows that the land to the west of Heron Way and north of Slippery Gowt Lane were never part of the agreement.' It is not accepted that the potential sites at Riverside involves landowners who refused to be involved in the s278 agreement; the agreement was voluntary 'such that certain land owners would make a contribution towards the cost of the road improvements if they developed their land for employment uses or alternatively by a long stop date of 2006. The agreement was retrospective for improved access that LCC had provided back in 1996 to land that at that time was allocated for employment.' However this did not mean that the employment allocation should remain in perpetuity. The NPPF is clear 'planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.' All sites have had the benefit of an employment allocation in the Local Plan since 1999, and even with an allocation and, in some cases, highways improvements, have proven unattractive to the market. Market signals therefore indicate that these sites may not be as deliverable as the preferred sites over the plan

Officer Recommendation:

BO047: land to the north of the Recycling Centre is one of the more suitable employment sites in Boston Borough and should be taken forward as a Preferred Option Employment Allocation. BO028: land to the east of Wyberton Low Road, BO045: Baptist Farm and

period, particularly with flood mitigation and any other opening-up infrastructure costs. However the take-up of land to the north of the Recycling Centre is better so this should be retained for employment use.

ID1: 396 comment_author: Mr Graeme Smith

comment content:

Paragraph 2 indicates a Proposed Local Employment Site of SHL2 Gosberton Road, Surfleet - this Site is not indicated on the Policy Map (Figure 1). The reference SR001 is used in the Employment Land Technical Paper 2016 (Page 117) - this appears to relate to Sur005 shown in the South East Lincolnshire Strategic Housing Land Availability Assessment - Surfleet (January 2016). The nomenclature (SHL2) appears consistent with the South East Lincolnshire Employment Premises & Land Review - Final Report October 2012 but the site is not listed in that document. It is suggested that a uniform naming system is adopted across all reports and maps to ensure that site references are not omitted from maps.

Officer Comment:

SR001: Gosberton Road, Surfleet is shown on Inset Map 25. The reference system used differs between documents and it is accepted that for clarity a common system should be used in the documents and on the Policies Map. The site was not identified in the South East Lincolnshire Employment Premises & Land Review, 2012 because that report only assessed the land availability of 29 Main Employment Areas and allocations and a sample of other sites in South East Lincolnshire – the Employment Land Technical Paper, 2016 and the SELAA January 2017 sought to address any gaps in evidence that existed.

Officer Recommendation:

SR001: Gosberton Road, Surfleet is one of the more suitable established employment sites in South Holland and should be taken forward as a Preferred Option Established Employment Site.

ID1: 397 comment_author: Mr L Biggadike

comment content:

on behalf of his family has put land forward for development, residential or employment has not been specified. It is to the north of the A17 and would be accessed from a modified roundabout from the proposed Peppermint Junction roundabout scheme. The land extends behind properties on Welbourne Lane to the Holbeach hospital.

Officer Comment:

HO019 Land to the west of Welbourne Lane North - Some substantial improvement works would be required to the A17 and to the new Peppermint Junction roundabout (the approved design does not include an access to this site). The site would also have an adverse impact upon the countryside character of the area, and is unlikely to be in demand for employment use, as the Holbeach FEZ which does have a proposed access and Lincoln University as an anchor is being developed opposite to the south of the A17. HO019 is also likely to have significant opening up highways infrastructure costs, which would need to be borne by a developer. This site is therefore considered to be undevelopable in this plan period.

Officer Recommendation:

HO019 is not one of the most suitable employment sites in South Holland and should not be taken forward as an Preferred Option Employment Allocation.

ID1: 398 comment_author: Cllr M Booth

comment content:

The future local planning boundaries need to address several issues. I am very concerned about the level of child poverty in Sutton Bridge, the highest ward in South Holland and I believe the best way out of this situation is to provide jobs. At Sutton Bridge there is a golden opportunity of doing this. Sutton Bridge has the river and the port, which opens itself to industry with the old Wingland Airfield which has most of the infrastructure in place and I believe we should do all we possibly can to promote this area, it is not Grade I agricultural land and building could start immediately, so I would like to suggest that all of the Wingland Airfield be included in providing much needed employment. Regarding the west end of the village on the B1359, again I would like to suggest that the new proposed boundary should go up to Fields Farm North road, this would include the new Burial ground and a strip of land between that and Bridge Road for much needed family homes. This strip of land, approximately one acre size, belongs to me which I would be willing to release for building. Along with other new areas providing housing and jobs, these proposals would be beneficial to the businesses, large and small, for Sutton Bridge and South Holland.

Officer Comment:

The creation of jobs and improving economic conditions is one way to reduce the impact of child poverty, although other factors will also play a part. SB003 protects Sutton Bridge Port and allocates additional land to support its future expansion. SB002 Wingland has been allocated in the adopted Local Plan since 2006 and has seen minimal land take-up even with highways infrastructure in place. The agricultural land classification identifies Wingland as Grade I agricultural land. The electricity supply to the area is poor and is unlikely to be able to accommodate more than limited development over the plan period. Other opening up costs including flood mitigation and drainage may also affect deliverability. The SHLAA identifies that 'Sub025 is not within or adjacent to Sutton Bridge's existing built-up area (defined settlement limit)' therefore the 'site's development would harm the appearance of the area – it would create an incongruous ribbon of development that would appear unrelated to the existing town' and is undevelopable.

Officer Recommendation:

SB003 Sutton Bridge Port is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Restricted Use Allocation. SB002 Wingland is one of the more suitable employment sites in South Holland and should be

ID1: 399 comment_author: Mr Fran Blinco

comment content:

The proposed main employment area [in Long Sutton] in the draft Local Plan is small in relation to the proposed housing development of 400 homes, implying little local growth over the extent of the Local Plan. It is my understanding that Government guidelines direct that new housing development should be close to employment opportunities. Is this lack of business opportunity due to unavailability of affordable insurance under Flood Re scheme? The implications are that the new housing development in Long Sutton will be serving as a commuter base for King s Lynn, Wisbech, Spalding and Boston areas etc. The draft Local Plan implies that new residents will be able to walk, cycle or use public transport to get to work. Meanwhile, the Council has announced a review of public transport with an aim to reduce bus services. This runs contrary to the sentiment in the draft Local Plan. Can the Council give some reassurance regarding the future of the present bus service?

Officer Comment:

The Peterborough Strategic Housing Market Assessment (SHMA), 2015 identifies that slightly more people commute to work outside the District than commute in. The SHMA indicates that this means that 'the Local Plan should plan for a higher increase in working residents for a given number of jobs than previously, and therefore the number of new homes should aim to provide for that' so it is not accepted that the focus of new homes will be for those working outside the District. The potential employment sites in Long Sutton cover 9.3ha; this is considered to promote employment growth in the Long Sutton area, and be suitable to provide jobs for residents who may choose to live and work in the Long Sutton area, appropriately complementing the delivery of 580 new dwellings over the plan period. The sites selected are based on the available land for employment in the area at January 2016 and are not linked to flood risk - the EA does not insist on stringent mitigation for less vulnerable developments such as employment (i.e. keeping all potential flood water out of buildings) but looks for developers, in their supporting Flood Risk Assessments, to demonstrate how they will manage the risk and keep people (employees) safe. However, additional sites have been put forward to be considered for employment use in Long Sutton (see Section 6) which may lead to the mix of sites being re-visited. The spatial strategy directs most new development to the higher tier settlements where opportunities for walking, cycling and public transport are greater. The operation of bus services is not a Local Plan matter.

Officer Recommendation:

New site LO009 south of Bridge Road is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Employment Allocation.

ID1:

400

comment_author:

Robert Doughty Consultancy Ltd

comment content:

Many businesses are required by circumstances to employ significant numbers of staff on a seasonal basis. The local workforce is not able to provide the numbers of staff required and, as such, businesses are required to employ workers from outside the area. As a consequence, the employers also need to provide temporary accommodation for workers, accommodation which may not be occupied all year round but is required year on year and as such has a permanent presence. This includes internal road layouts, service blocks, small shops, launderettes etc in addition to the accommodation itself. Although the accommodation itself may be in the form of caravans, it may also take the form of permanent buildings. Policy 7 should be amended to provide support and guidance for the provision of such accommodation to support rural businesses.

Officer Comment:

Although many local businesses employ a seasonal workforce, it is not accepted that the majority come from outside the area and need temporary accommodation, as may have been the case in the past. Instead, 'seasonal workers' have relocated to the area, and move between jobs rather than between different parts of the country or from abroad. This means that workers have permanent accommodation in the area. Additionally the amount of private rented accommodation and HMOs in the area has increased. Therefore it is considered that there is no longer a need for 'transient worker accommodation' and supporting infrastructure.

Officer Recommendation:

No change required.

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ID1:

401

comment_author:

Robert Doughty Consultancy Ltd

comment content:

we support the designation of land for employment uses under Policy 7. We note, however, that the policy does not specify the amount of land available at each location, it is not clear which specific area is referred to in the policy, and that the site references are not included on the Inset Map. This confusion is compounded by the use of different reference numbers within the Employment Technical Paper, which refers to the Wardentree Lane area as SP001/SP002 when the policy refers to SH7. Policy 7 should be amended to include the specific details for each of the named sites. We note that the Technical Paper has identified specific conditions relating to the local market in respect of employment land and premises, such as the tendency to design and build rather than build and sell and that vacant units are unlikely to meet the changing needs of economic development in the area, from which we conclude that there is a clear need to maintain a supply of large, readily available sites, such as our client's land, to meet the future economic needs of the area. We support the designation of land at Wardentree Lane as Proposed Main Employment and Existing Employment Areas. Our client's land at Elsom's Way and Wardentree Lane are subject to extant planning permissions H14-0709-14 and H14-0121-09. These sites are available for development and play a significant part of South East Lincolnshire's Employment Land Portfolio in Spalding. The Wardentree Lane area, being the major focus for economic development in Spalding, is accessible, high profile and readily serviced and provides an opportunity to provide sites to support the economic development of South Holland and the wider South

Officer Comment:

It is accepted that Policy 7 does not identify site areas, available land or site references. There are also some inconsistencies between the Local Plan and its supporting documents relating to references. Support for SP001 Wardentree Lane is welcome.

Officer Recommendation:

Add site areas and available land to Policy 7. Ensure references are consistent between the Local Plan, Policies Map and supporting documents. SP001 Wardentree Lane is one of the more suitable Potential Employment Sites in South Holland and it should be t

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East Lincolnshire area.

ID1: 402 comment_author: Mr John Stuart Birkett

comment_content:	Officer Comment:	Officer Recommendation:
Policy 7: The Boston Dock estate is not recognised as a 'main' or 'local' employment site. An oversight?	BO009 Boston Port Estate is identified as a Restricted Use Site – to promote employment uses that support the unique role of the port – rather than provide for main employment uses.	BO009 Boston Port Estate is one of the more suitable employment sites in Boston Borough and should be taken forward as a Preferred Option Restricted Use Allocation.

ID1:

403

comment_author:

Hume Planning Consultancy Ltd

comment content:

The Plan takes a conventional approach to the uses to which designated employment land can be put, i.e. The categories of B1, B2, and B8. This is far too restrictive when the overall object is for employment generation. Local Planning Authorities are now beginning to recognise that business parks and industrial estates are suitable for a range of uses beyond those appearing in Policy 7 of the Plan and which reflect changing trends and activity in society while continuing to balance the needs of those traditional businesses in B1, B2 and B8 uses. The Plan areas concentration on, and the benefits arising from, food production, while a good thing, needs to be offset by emerging trends in a range of specific employment sectors such as: Energy and Environmental Technologies Engineering and Manufacturing Building Products and Construction (including off site manufacture) Health and Social Care, both in the public and private sectors Creative Industries Tourism Leisure and Learning Activities Some of the above fit the B uses in Policy 7, while a number are sui generis and will not. Business Parks, especially where there is vacant floor space can readily accommodate: A local shop Support facilities for business Children s nursery/day centre Gymnasia/Fitness Centres Trade Counters Car Showrooms Specific retail activity where ancillary to showrooms, themselves ancillary with storage and distribution. Appropriately located recycling activity and processing of materials. A positive and constructive approach should be taken towards planning applications for economic land uses with flexibility in policies to reflect changing economic and societal circumstances. In considering proposals, weight should

Officer Comment:

The purpose of the Main and Local Employment Area designation is to ensure that there is sufficient land available in the right locations for B use development. This is necessary to demonstrate that there is sufficient land available to meet the anticipated level of B use jobs in the area over the Plan period. However it is recognised that these areas can also accommodate other non B uses, however it is appropriate that these should be ancillary to the effective functioning of the area, so as not to dilute the primary purpose of the area. This will also protect the vitality and viability of town centres and support appropriate mixed-use schemes in the area. Support form Policy 10 is welcome.

Officer Recommendation:

Amend Policy 7 to ensure ancillary non B uses can be secured in Main and Local Employment Areas and within Established Employment Areas. For allocations identify the mix of main uses that would be appropriate.

be given to the regeneration, social inclusion and mixed use development benefits of development. Following on from the theme developed in these Representations, appropriately located and diverse employment opportunities should be extended to the villages, where compatible with sustainable development and thereby reflecting the Framework at paragraph 28. In this respect, the provisions of Policy 10 are welcomed. Suggested amendments to Policy 7 are set out below. To reflect the emerging trends in the employment sector to recognise a range of uses as set out above. Add another paragraph under Policy 7 to read: "To reflect changing employment trends, to encourage smaller business start ups and provide and encourage greater employment flexibility on new and existing employment allocations where appropriate and having regard to other policies in the Plan, additional uses including Support Facilities for Business, Children s Nursery/Day Centres, Gymnasia/Fitness Centres, Trade Counters and Car Showrooms will be supported. Provision will also be made, where appropriately located, for Recycling Activity and the Processing of Materials."

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1:

404

comment_author: Savills

comment content:

we support the proposed Main Employment Area allocation in Sutton Bridge on land owned by the Henry Smith Charity. The site is located to the East of the River Nene. It is requested that the site in its entirety alongside is allocated as a Main Employment Area.

Officer Comment:

The adopted Local Plan allocates 55.6ha of land for employment use at Wingland, the current proposal is for 7.6ha. The amount of employment land proposed for South East Lincolnshire took account of many issues, including: the findings of the South East Lincolnshire Employment Land Technical Paper (January 2016); the existing and predicted population of the area; economic conditions and trends between 2001 and 2016; and the take-up of land for B Use development across South East Lincolnshire and within employment allocations. The take-up of land and market interest for the available land does not justify the allocation of all 55.6ha, but the allocation of a small amount of land is appropriate to accommodate the expansion of existing uses or for the development of small-scale enterprises.

Officer Recommendation:

SB002: Wingland is one of the more suitable employment sites in South Holland and should be taken forward as Preferred Option Restricted Use Allocation.

ID1: 405 comment_author: Bruce Mather Ltd

comment content:

BO 005 Riverside Industrial Estate, Boston: On behalf of Boston Baptist Trust we OBJECT to the de-allocation of this 25.2ha of employment land and to the allocation of 17.4ha of alternative land. The existing allocation has infrastructure provided to service it, which was provided at tax-payers expense, and that of some landowners. To de-allocate it is inconsistent with the reasons for its allocation in the first place. To now allocate land where landowners refused to contribute financially to the provision of infrastructure is totally contradictory to established policy.

Officer Comment:

The proposed 17.4ha of employment land at Riverside is not alternative land – this land is within the adopted Local Plan allocation. Marsh Lane was straightened and improved in 1996, and paid for by LCC and certain landowners. LCC confirm that ‘land to the east of Heron Way, the site of the Waste Recycling Centre and land to the north of Recycling Centre were subject of the S278 agreement. LCC did receive payment from this landowner under a contract they had willingly entered in to. The plan attached to the agreement shows that the land to the west of Heron Way and north of Slippery Gowt Lane were never part of the agreement.’ It is not accepted that the potential sites at Riverside involves landowners who refused to be involved in the s278 agreement; the agreement was voluntary ‘such that certain land owners would make a contribution towards the cost of the road improvements if they developed their land for employment uses or alternatively by a long stop date of 2006. The agreement was retrospective for improved access that LCC had provided back in 1996 to land that at that time was allocated for employment.’ However this did not mean that the employment allocation should remain in perpetuity. The NPPF is clear ‘planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.’ All sites have had the benefit of an employment allocation in the Local Plan since 1999, and even with an allocation and, in some cases, highways improvements, have proven unattractive to the market. Market signals therefore indicate that these sites may not be as deliverable as the preferred sites over the plan

Officer Recommendation:

BO047: land to the north of the Recycling Centre is one of the more suitable employment sites in Boston Borough and should be taken forward as a Preferred Option Employment Allocation. BO028: land to the east of Wyberton Low Road, BO045: Baptist Farm and

period, particularly with flood mitigation and any other opening-up infrastructure costs. However the take-up of land to the north of the Recycling Centre is better so this should be retained for employment use.

ID1: 406 comment_author: Geoffrey Collins & Co

comment content:

I apologize for the error contained in my e-mail of 1 February. Unfortunately I took the information from the Inset Map No. 7 rather than from the Employment Land Technical Paper which I have not had an opportunity to study in any detail within the limited period of the Public Consultation. A larger area of land has been allocated for employment use than was suggested in my e-mail. However, I believe the land behind the Princes Food Factory on Bridge Road Long Sutton could be owned or optioned by the factory. If this is the case, then it is not available for other Employment Purposes for employment. The land fronting Bridge Road is, I believe, reliant on the provision of a ghost island on Bridge Road. The significant cost of providing this requirement has prevented the development of this land for many years. Furthermore, this site is apparently a Specific Occupier site and presumably also not available to other Employment Users. It is time to identify a more viable area of land in Long Sutton.

Officer Comment:

The land to the south of Princes has been submitted for consideration as general employment land by the landowner (not Princes). The Highways Authority identifies that land fronting Bridge Road 'looks to be wide enough to accommodate a suitable access and there is suitable visibility in both directions. Bridge Road is the old A17 so is of a suitable standard to be able to accommodate the vehicular activity associated with a B1 B2 and B8 use on this site.' Therefore the opening up infrastructure costs are likely to be low. The potential employment sites near Long Sutton (Bridge Road Main Employment Area and Princes/LC Packaging) covers 9.3ha, which is a slight decrease from the adopted Local Plan (12.2ha) which are considered to be suitable, available and deliverable. The potential employment sites reflected the availability of land in January 2016. However additional sites have been put forward to be considered for employment use in Long Sutton.

Officer Recommendation:

New site LO009 south of Bridge Road is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Employment Allocation.

ID1:

407

comment_author: South Lincs Environmental Group

comment content:

After members attended the consultation day in Sutton Bridge on the 15th January to view the draft plan our group are concerned that the plan is misleading to the public. 1.We noted that the proposed new huge gas fired power station to be built at Wingland on a green field site adjacent to the existing one, is not shown at all. This is extremely misleading.The plan must be based upon up-to-date information. 2.The Wingland Industrial site appears to have been reduced in size however, the last local plan had a loop hole which stated one off developments would be allowed, this new plan has yet another loop hole allowing development in the country side This plan offers no protection to residents quality of life.There are five main towns in South Holland, Sutton Bridge is the smallest town with the most industry. 3.Our group have lobbied to have Wingland Industrial area removed from the local plan.SHDC have for over twenty years tried to promote the area to no avail. The most appropriate area for class B1,B2 and B8 industry is at Little Sutton. A large employer is already sited there, good road access for HGV s could easily be made available, linking with the A17 by-pass, therefore removing the need to use the old A17 through Sutton Bridge and Pop bottle bridge at Long Sutton.The site would be easily accessible on foot or by bike from either town, in line with government policies. We note that there is no industry planned for Long Sutton which is a main town and larger than Sutton Bridge. 4.Our group are concerned that not enough importance is put on the River Nene and it s environs. The Wash is a highly protected site an SSI, SPA and Ramsar site among others. The Wingland site is too close to the Nene and is a Zone 3 flood risk area.

Officer Comment:

The employment allocations on the Policies Map only show land that is identified for B1, B2 and B8 development. Power stations are a sui generis, so are not classified as an employment use. The adopted Local Plan expects development at Wingland 'to be confined to Classes B1, B2 and B8 use but exceptionally other employment which does not fall within these categories may nevertheless be appropriate.' However it is recognised that Main Employment Areas can also accommodate other non B employment generating uses, but it is appropriate that these should be ancillary to the effective functioning of the area, so as not to dilute the primary purpose of the area. Consistent with national policy the Local Plan should allow for development outside settlement boundaries that is necessary to such a location and/or where it can be demonstrated that it meets the sustainable development needs of the area in terms of economic, community and environmental benefits. Other Local Plan policies will be used to ensure that the amenity of residents is satisfactory. The potential employment sites near Long Sutton (Bridge Road Main Employment Area and Princes/LC Packaging) covers 9.3ha, which is a slight decrease from the adopted Local Plan (12.2ha) which are considered to be suitable, available and deliverable. The potential employment sites reflected the availability of land in January 2016. However additional sites have been put forward to be considered for employment use in Long Sutton. The HRA identifies that the employment allocations have been checked and does not raise any screening concerns in relation to European sites. However, project level HRA will be required to check for impact pathways and ensure no adverse effects.' It

Officer Recommendation:

SB007 Sutton Bridge Power Station and SB014 Sutton Bridge Power Station 2 are more suitable Potential Employment Sites in South Holland and it should be taken forward as Preferred Option Restricted Use Sites for power generation and related uses only. SBO

NPP states that industry should be directed away from high flood risk areas. The residents have recently fought off an incinerator on this site by way of judicial review. The Wingland site is surrounded by residential properties already suffering emissions from the existing gas fired power station and SHDC still refuse to monitor that site. This new plan will run until 2036 and our group are concerned that Sutton Bridge is again not being listened to. Sutton Bridge is the gateway to Lincolnshire.

appears that taking forward the site for employment use in terms of the natural environment is acceptable. Although the site is within Flood Zone 3a, flood hazard in 2115 is classified as 'danger for all', and flood depth in 2115 is classified as '1-2m' the Environment Agency does not insist on stringent mitigation for less vulnerable developments (i.e. keeping all potential flood water out of buildings) but looks for developers, in their supporting Flood Risk Assessments, to demonstrate how they will manage the risk and keep people (employees) safe. Therefore identifying this land for employment use is consistent with the EA's approach.

ID1: 408 comment_author: Fishtoft Parish Council

comment_content:
[We have] concerns as to where such a large number of new residents would work, there is a lack of employment in the area.

Officer Comment:
National policy identifies that sites allocated in a Local Plan must be suitable, available and deliverable over the plan period. The land identified in/adjacent/within close proximity to Fishtoft reflected the availability of sites in January 2016. While it is accepted that no employment sites have been identified in the Fishtoft area, Fishtoft is 1km from Boston settlement boundary and the wide range of employment opportunities that are available there.

Officer Recommendation:
No change required.

ID1:

409

comment_author: Indigo Planning

comment content:

Draft Policy 7 sets out how the council will seek to allocate and safeguard employment land over the plan period. The policy includes opportunities for mixed-use development with Class B, with complementary employment generating uses including A1 - A5, C1, D1 or Sui Generis at five sites, provided such uses do not cover over 20% of the gross site. The sites include: BOM1: Endeavour Park, Boston; BOM2: Distribution Park, Kirton; SHM1: Holbeach Tehcnology campus, Holbeach; SHM2: Spalding Business Park, Wardentree Lane, and SHM3: Lincs Gateway, Spalding. Whilst it is accepted that some non B-class employment-generating uses are appropriate in such locations, we object to the inclusion that A1-A5, C1, D1 and Sui Generis uses are acceptable, subject to their gross proportion covering up to 20% of the site area. This is considered to be both unjustified and contrary to national policy; in terms of the sequential test. The current policy would permit open A1 consents in out of centre locations and would not require new development to carry out a sequential or impact assessment. This could have a significant impact on town centre vitality and viability, and is not in accordance with the NPPF s town centre first policy approach. The policy should therefore, be amended such that any proposed A1 use floorspace within these out of centre locations is only acceptable subject to satisfying the sequential and impact tests. The policy should also include a requirement for new development to demonstrate that, the site cannot reasonably be used for B-class uses or that the site has previously been marketed for such uses prior to permitting A1 consent.

Officer Comment:

It is important that the Local Plan identifies locations where mixed-use development will be promoted. It is also important that the Local Plan is promotes the vitality and viability of town centres. Reference to A1 being an appropriate use in such locations was a typo. As such the approach taken in Policy 7 will be re-visited.

Officer Recommendation:

Amend Policy 7 to ensure ancillary non B uses can be secured in Main and Local Employment Areas and within Established Employment Areas. For allocations identify which will be suitable for mixed use development (where the nopr B use does not need to be an

ID1: 410 comment_author: Boston Baptist Trust

comment_content:

BO005 Riverside Industrial Estate, Boston: The Trustees of Boston Baptist Trust strongly OBJECT to the de-allocation of this 25.2ha of employment land and to the allocation of 17.4ha of alternative land, with particular reference to the land directly to the North (rear) of the recently constructed Recycling Centre on Slippy Gowt Lane. The existing allocation has infrastructure provided to service it, which in this particular instance was provided at great expense by the Trust at the insistence of Lincolnshire County Council “ as a response to a perceived threat from LCC some years ago their applying for a CPO should the Trust decline to pay. We believe that having accepted payment, LCC has entered into a formal agreement with Boston Baptist Trust to provide infrastructure for light industrial development and to promote the sale of the land for that purpose. For LCC to now withdraw from this agreement would leave the Trust with no other option than to seek financial recompense for monies paid, services withheld and an agreement broken. Boston Baptist Trust request that LCC honour its original agreement and allow the whole of plot 3 (as above map) to retain its allocation as available for light industrial development.

Officer Comment:

The proposed 17.4ha of employment land at Riverside is not alternative land – this land is within the adopted Local Plan allocation. It is accepted that Marsh Lane was straightened and improved in 1996, and paid for by LCC and certain landowners. LCC confirm that ‘land to the east of Heron Way, the site of the Waste Recycling Centre and land to the north of Recycling Centre were subject of the S278 agreement. LCC did receive payment from this landowner under a contract they had willingly entered in to. The plan attached to the agreement shows that the land to the west of Heron Way and north of Slippy Gowt Lane were never part of the agreement.’ The land to the north of the Recycling Centre would require utilities, flood mitigation, a spine road/access. LCC identifies that the agreement was voluntary ‘such that certain land owners would make a contribution towards the cost of the road improvements if they developed their land for employment uses or alternatively by a long stop date of 2006. The agreement was retrospective for improved access that LCC had provided back in 1996 to land that at that time (1996) was allocated for employment.’ However this did not mean that the employment allocation should remain in perpetuity, or that LCC would promote the sale of land for employment use. However market signals indicate that land close to the Recycling Centre has better take-up of land therefore should be allocated.

Officer Recommendation:

BO047: land to the north of the Recycling Centre is one of the more suitable employment sites in Boston Borough and should be taken forward as a Preferred Option Employment Allocation.

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ID1: 411 comment_author: Mr Jonathan Tyler

comment_content:

Re: Long Sutton I believe that the local employment isn't sufficient enough even in the present state to support local school leavers let alone with the extra population that this development would bring.

Officer Comment:

The potential employment sites in Long Sutton cover 9.3ha; this is considered to be a suitable amount of land to provide jobs for residents who may choose to live and work in the Long Sutton area, and should appropriately complement the delivery of 580 new dwellings over the plan period. However, additional sites have been put forward to be considered for employment use in Long Sutton which may lead to the mix of sites being re-visited.

Officer Recommendation:

New site LO009 south of Bridge Road is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Employment Allocation.

ID1: 412 comment_author: Clowes Developments North Wes

comment_content:

Reference is made in Paragraph 4.1.2 to the vacant Norprint factory in Boston. Clowes Developments (North West) Ltd would point out that neither the Norfolk Street or Horncastle Road factories are presently vacant, though we are advised that they will become vacant during the summer of 2016. As a consequence both sites will become available for redevelopment this year. Given their location, size and condition, both sites are unsuitable for re-use for employment uses and consequently Clowes Developments (North West) Ltd has submitted outline planning applications for residential use. The Plan should be amended to reflect this position.

Officer Comment:

It is accepted that the Norprint site, Norfolk Street is not vacant at present. The Employment Land Technical Paper, 2016 identifies that 'the building [on Norfolk Street] is extremely poor quality and would require significant upfront investment to either upgrade to meet modern business needs or to demolish and rebuild, which may also lead to remediation works and additional costs. As a result the site has attracted little market interest for sale/let. De-allocate the site for employment use and let the market dictate the future direction of the site in the long term. Could be appropriate for an alternative use.' this supports the owners' intentions for the site. An outline planning application for residential use is pending. Confirmation that the Horncastle Road site is no longer available is noted. An outline planning application for residential use is pending.

Officer Recommendation:

BO010 Norprint is not one of the more suitable Potential Employment Sites in Boston Borough and it should not be taken forward as a Preferred Option Employment Allocation.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1:

413

comment_author: Chestnut Homes

comment content:

The Local Plan quite rightly seeks to allocate sufficient land to ensure the economic potential of the area is achieved. With the projected increase in housing numbers, it is vital that appropriate employment sites are identified and allocated to ensure appropriate levels of job growth in the area over the Local Plan period. In our opinion, such employment sites should be located in the most sustainable locations with a wide variety of sites available to suit varying needs. It is vital that such sites offer an attractive proposition to inward investment with high quality, well located sites needing to be available. In this respect, Policy 7 goes a long way in identifying what we believe is a suitable range of sites to cater for the potential future employment land needs of the area. In particular we are pleased to note the inclusion of Q2 The Quadrant, Boston as an allocated site for employment land. At paragraph 4.1.8 the Q2 site, amongst others, is identified because of the strategic economic importance, attractiveness to the market and their ability to accommodate business clusters and high value employment which could stimulate economic growth and diversify the local economy. We would agree this site has that potential and welcome the recognition in this draft Local Plan. With regards to this Q2 site, we believe that it should also be listed within the potential mixed use developments at Section 3 of the policy. Plans for this site will evolve through the Masterplan and Local Plan processes but it has always been promoted as a genuine mixed-use development and hence needs to be recognised as such within this designated policy. This will provide the flexibility as the plans for this site evolve to produce the genuine

Officer Comment:

Support for the sites identified in Policy 7 is welcome. Support for the identification of part of Q2 as an employment land is welcome. Support for Q2 as a mixed use site is noted. Support for Q2 as a prestige employment site is welcome. Support for a masterplan is welcome.

Officer Recommendation:

BO008 Q2: The Quadrant is one of the more suitable Potential Employment Sites in Boston Borough and should be taken forward as a Preferred Option Employment Allocation. Amend Policy 7 to provide for mixed use development through the masterplan process.

high-class development that is required to help regenerate Boston. In this regard we would fully support the inclusion of Q2 within the identified prestige employment sites within Section 4 of this policy. With regard to delivering mechanisms for the Q2 site, we acknowledge and support the suggestion that The Quadrant Q2 will be promoted through a Masterplan process and will actively move this process forward with the local planning authority as part of the Local Plan process.

ID1:	414	comment_author:	Tony Lister
comment content:	Officer Comment:	Officer Recommendation:	
Re: Proposed housing in Long Sutton - Where will people work? Most work in this area is agricultural/food related. Most of these jobs are filled by agency workers, and not everyone either wants this type of work or is able to do this type of work.	The potential employment sites in Long Sutton cover 9.3ha; this is considered to be a suitable amount of land to provide jobs for residents who may choose to live and work in the Long Sutton area, and should appropriately complement the delivery of 580 new dwellings over the plan period. However, additional sites have been put forward to be considered for employment use in Long Sutton which may lead to the mix of sites being re-visited.	New site LO009 south of Bridge Road is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Employment Allocation.	

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ID1: 415 comment_author: Mrs D Ingham

comment_content:

Re: Holbeach - It will be good if land can be made available for industry/employment and again this would be better placed nearer to the main routes around Peppermint junction. Although I doubt there can be enough jobs created for the increase in population.

Officer Comment:

HO002 Holbeach Food Enterprise Zone is allocated adjacent to Peppermint Junction. This site covers 16.3ha, therefore it is not accepted that this land, together with existing employment opportunities at Fleet Road Industrial Estate, Holbeach cannot support the level of housing identified.

Officer Recommendation:

HO002 Holbeach Food Enterprise Zone is one of the more suitable Potential Employment Sites in South Holland and should be taken forward as a Preferred Option Employment Allocation.

ID1: 416 comment_author: Spalding Peterborough Transport

comment_content:

The new Lincolnshire gateway will create the employment needed for the area which is already saturated with HMO for workers in the area. Improving transport links will bridge the gaps for employers to allow workers to commute from Peterborough Lincoln Wisbech and Kings Lynn hubs.

Officer Comment:

SP002 Lincs Gateway is expected to create employment, and potentially different types of jobs to that which are commonly found in the area, however this is also true of other potential employment sites in South Holland. While it is possible that employees may travel to work from outside the area, the intention is to provide employment uses that encourage employees to live and work in the area, thereby benefitting the local economy.

Officer Recommendation:

SP002 Lincs Gateway is one of the more suitable Potential Employment Sites in South Holland and should be taken forward as a Preferred Option Employment Allocation.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 417 comment_author: Louise McGuinness

comment_content:

The new Lincolnshire gateway will create the employment needed for the area which is already saturated with HMO for workers in the area. Improving transport links will bridge the gaps for employers to allow workers to commute from Peterborough Lincoln Wisbech and Kings Lynn hubs.

Officer Comment:

SP002 Lincs Gateway is expected to create employment, and potentially different types of jobs to that which are commonly found in the area, however this is also true of other potential employment sites in South Holland. While it is possible that employees may travel to work from outside the area, the intention is to provide employment uses that encourage employees to live and work in the area, thereby benefitting the local economy.

Officer Recommendation:

SP002 Lincs Gateway is one of the more suitable Potential Employment Sites in South Holland and should be taken forward as a Preferred Option Employment Allocation.

ID1: 418 comment_author: Wash & Sutton Bridge Protection

comment_content:

It is good to see that the area for proposed development on the Wingland site has been reduced.

Officer Comment:

Support for SB002 Wingland is welcome.

Officer Recommendation:

SB002: Wingland is one of the more suitable employment sites in South Holland and should be taken forward as Preferred Option Restricted Use Allocation.

ID1:

419

comment_author:

Mr & Mrs J Back and Mr & Mrs S

comment content:

Re: Long Sutton - We have lived on Garnsgate Road since 1971 and no new employer has emerged to offer new jobs in any quantity to this village, or surrounding area to promote the need for new housing on the scale envisaged. Where in this locality is there land available to encourage firms, however big or small to start up a business. It would have to be somewhere away from the populated areas as none of the roads in the immediate area are suitable to take heavy traffic. Or are you expecting this to be a dormitory town and everyone will drive to Lynn, Spalding or Peterborough.

Officer Comment:

The potential employment sites in Long Sutton cover 9.3ha; this is considered to be a suitable amount of land to provide jobs for residents who may choose to live and work in the Long Sutton area, and should appropriately complement the delivery of 580 new dwellings over the plan period. The potential employment sites reflected the availability of land in January 2016. However, additional sites have been put forward to be considered for employment use in Long Sutton which may lead to the mix of sites being re-visited.

Officer Recommendation:

New site LO009 south of Bridge Road is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Employment Allocation.

ID1:

420

comment_author: Indigo Planning

comment content:

Draft policy 7 focuses on allocating and safeguarding employment land in order to meet the requirements of the Local Plan. Paragraph 3 of the policy identifies five sites for: providing opportunities for mixed use development within Use Classes B1, B2 and B8 and complementary employment-generating uses within Use Classes A1, A2, A3, A4, A5, C1, D1 or Sui Generis, so long as their proportion only covered up to 20% of the gross site area at: - BOM1: Endeavour Park, Boston; - BOM2: Distribution Park, Kirton; - SHM1: Holbeach Technology Campus, Holbeach; - SHM2: Spalding Business Park, Wardentree Lane; and - SHM3: Lincs Gateway, Spalding. Although we recognise that that some non B-class employment-generating uses are appropriate in such locations, the proposal in the draft policy to allow up to 20% of the gross site area for non-employment uses including A1, A2, A3, A4, A5 and C1 uses is both unjustified and contrary to the sequential approach set out in the NPPF. As currently drafted, Policy 7 would allow a significant increase in A1 (retail) floorspace in out of centre locations, which is completely contrary to the aims of the NPPF. To put this into perspective, Table 1 below provides a summary of the gross site area of each of the five sites identified under the draft policy and sets out the quantum of floorspace of town centre uses that would be allowed under Policy 7 as drafted. As Table 1 demonstrates, if 20% of the gross area of each site were to come forward for an A1 (retail), which would be permitted by the current wording of the draft policy, a total of 465,200sqm of retail floorspace could be provided in out of centre locations. Whilst we recognise that in practice, retail floorspace would only cover circa

Officer Comment:

It is important that the Local Plan identifies locations where mixed-use development will be promoted. It is also important that the Local Plan is promotes the vitality and viability of town centres. Reference to A1 being an appropriate use in such locations was a typo. As such the approach taken in Policy 7 will be re-visited.

Officer Recommendation:

Amend Policy 7 to ensure ancillary non B uses can be secured in Main and Local Employment Areas and within Established Employment Areas. For allocations identify which will be suitable for mixed use development (where the non B use does not need to be anc

25% of the gross floor area, this could still potentially result in 116,300sqm of A1 floorspace being provided in these locations. The Draft Local Plan sets out in Policy 24 the identified capacity for additional retail floorspace in Boston and Spalding town centres. It states there is capacity for an additional 31,469sqm of retail floorspace (3,365sqm convenience and 28,104sqm of comparison) up to 2031. This includes a total of 13,096sqm (2,286sqm convenience and 10,810sqm of comparison) in Spalding. If the council were to proceed with Policy 7 in its current form, the overall capacity for both Boston and Spalding town centres could potentially be met three times over in out of centre locations. This approach is entirely inconsistent with and contrary to the NPPF, which requires a town centre first approach, and it would result in a significant impact on the sub-regional centres of Boston and Spalding. It is highly likely that both centres would incur significant adverse impacts as high levels of expenditure would be taken away from the existing centres. This would have significant impacts on existing retailers leading to higher levels of vacancies and have a detrimental impact on the vitality and viability of the centres. In respect of the employment sites listed in Policy 7, paragraph 5.3 of the Employment Land Technical Paper 2016 states that: 'it is recommended that the mix of uses is not open-ended. Unless specified by a planning permission, the proportion of B-uses in these areas should not occupy more than 20% of the total site area, or form such a large proportion of the area that it threatens its continuing B-use function, subject to it being demonstrated that there is no reasonable prospect of the site / premises continuing to be used for B-use'. A 20% cap would also discourage the unsustainable dispersal of town centre uses to a Main Employment

Area, undermining the overarching principles of national policy which require the promotion of the vitality and viability of town centre. Firstly, we assume that the first reference to B-uses is incorrect and rather than limiting such uses to not more than 20% of the total site area, this should refer to non B-uses. This must be clarified. The general position set out in paragraph 5.3 in terms of the potential dispersal of town centre uses and the impact on the vitality and viability of town centres is correct. However, a 20% cap is far too high a threshold when considering the actual floorspace figures that might result (as shown in the table above). The policy should include the need to satisfy the sequential and retail impact tests to ensure that any development of A1 floorspace in out of centre locations does not have an adverse impact on the health of existing centres. It should also include a requirement to demonstrate that there is no reasonable prospect of the site being used for B Class uses. In light of the above points, we suggest that the wording of paragraph 3 of policy 7 of the draft Local Plan for South East Lincolnshire should be amended as follows: Providing opportunities for mixed-use development within Use Classes B1, B2 and B8 and complementary employment-generating uses with Use Classes A1, A2, A3, A4, A5, C1, D1 or Sui Generis, so long as they are: 1) able to provide marketing evidence that there is no reasonable prospect of the site being used for B class uses; and 2) be genuinely ancillary to the prevailing B class uses in their function, nature, scale and proportionality. Any proposals for town centre uses over 200sqm in floor area will be required to satisfy the sequential test. Furthermore, any proposals for A1 floorspace over 250sqm in size will need to be supported by a retail impact assessment in accordance with Policy 22. This would ensure that town centre uses are directed to the

main retail centres of Boston and Spalding in the first instance and any potential impacts on the vitality and viability of the centres is appropriately assessed and schemes resisted where adverse impacts are identified.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 421 comment_author: RPS CGMS

comment content:

Policy 7 d s not recognise the existence of employment sites in the countryside. It provides safeguard only for the employment sites identified in the Policies Map . This leaves a policy vacuum which fails to provide a safeguard for the important scattered employment sites that contribute to the economic success of the region. Furthermore, this lack of policy guidance for previously developed land (brownfield sites) leaves the draft Local Plan without a specific and applicable policy on the protection of existing uses, the acceptable quantum of development, the possible change of use and the potential development opportunities for employment sites in the countryside. Policy 28 of the NPPF reads as follows: Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should: - support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings; - promote the development and diversification of agricultural and other land-based rural businesses; - [;] In relation to Business, Policy 157 of the NPPF states that Local Plan should, among other things, allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate The South East Lincolnshire Local Plan, as currently drafted, fails to comply with the NPPF because: - It d s not support the sustainable growth and expansion of all types of business and enterprise because it d s not

Officer Comment:

The Local Plan has identified Specific Occupier Sites and Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF.

Officer Recommendation:

Amend Policy 7 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.

contain any specific reference to the existing businesses located in employment sites in the countryside; - It does not contain specific policies on the expansion, replacement or conversion of existing employment sites in the Countryside; Proposed changes: - Policy 7 should include reference to employment and other previously developed sites (brownfield sites) in the countryside. This designation should be explained in a new paragraph of Policy 7; - Provisions should be made to regulate the protection, the redevelopment, refurbishment or extension of previously developed sites (brownfield sites) in the countryside; - Provisions should be made to allow the modernisation and enhancement of previously developed sites (brownfield sites) in the countryside; and - Provisions should be made to allow the conversion, reuse and change of use of previously developed sites (brownfield sites) in the countryside to other sustainable uses. Be allocated for specific alternative uses as per Paragraph 157 of the NPPF. We submit that the draft South East Lincolnshire Local Plan is unsound because it is not consistent with national policy. More specifically, it fails to comply with paragraphs 17, 28, 47, 48, 50, 54, 111, 157 and 159 of the National Planning Policy Framework. For this reason, we invite the Local Planning Authority to review, revise and modify the South East Lincolnshire Local Plan to address the issues set out in the precedent paragraphs.

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ID1: 422 comment_author: Cushman and Wakefield

comment content:

Draft Policy 7 states that proposals for Use Classes B1, B2 or B8 outside of the above allocated areas and those identified by Policies 8 and 9 will be supported provided that there is no adverse effect on the amenity of adjacent occupiers, the townscape and landscape of the area or the surrounding environment. We raise objection to the wording of this policy as it is too restrictive. The policy states that proposal will be supported provided that there is no adverse effect on the amenity of adjacent occupiers; (etc) [Emphasis added] this wording does not allow for any adverse effects at all without clarification as to a degree of adverse effects or mitigation which may lead to a proposal being considered acceptable. As such, we advise the wording is revised to state that no unacceptable adverse effect should arise. The Flamingo Flowers site in Low Fulney is shown on the proposals map as falling outside a defined settlement boundary and designated as Countryside. We object to this designation as it does not reflect the level of development, the long established use of the site dating back to the 1990s and the level of activity at this site especially with regards to the number of employees which (including agency staff) is in excess of 550. The site seems to fall between the arbitrary definitions as established Employment Land Technical Paper 2016. However, given that the site is clearly not Countryside and its significance as a local employer, it should have a designation to reflect this to ensure future growth is not restricted. The strict parameters for Employment Land as established in the Technical Paper were not subject to consultation and, as such, no previous opportunity has been provided to raise

Officer Comment:

The Local Plan has identified Specific Occupier Sites and Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF. It is impracticable for the Local Plan to identify all existing employment sites on the Policies Map. As such, those identified by Policy 7 should in general be within 400m of a higher tier settlement to provide consistency with the Local Plan's spatial strategy and be within an acceptable walking/cycling distance of the settlement boundary and its homes, shops and other facilities. However, the approach to other employment sites needs to be clarified to provide businesses with confidence to stay in the area, expand and grow.

Officer Recommendation:

SP039 Flamingo Flowers is not one of the more suitable Potential Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Allocation. Amend Policy 7 to ensure compliance with the NPPF relating to employment out

representation with regards to this issue. It is suggested that the site would be best suited to be classified as either a Main Employment Site or a Specific Occupier Site and the parameters of these allocations should be altered to include this site. Alternatively, a new category could be created to recognise and specifically encourage employment land within the countryside on sites such as this.

ID1:

423

comment_author: Spalding and District Civic Society

comment content:

4.0.5 (bullet point 5) and 4.1.7 Both admirable statements, but actively undermined by incessant government meddling: offices can be changed into flats basically without planning permission; land allocated for industrial use can, if such development is delayed, be developed for so-called 'starter homes'; etc. Can the plan's provisions be strengthened?

4.1.4 (last sentence) Policy 7, 4 ("exceptional") 4.1.13 ("high quality...")

Good but there is little sign of this really mattering at the moment in South Holland. (Plans so far submitted piecemeal for the Gateway site and approved, for example, are 5th-rate.) At end of Policy 7 and 4 and 4.1.13 add: It is recognised that the impact of this policy would depend upon implementation.

Officer Comment:

B1 use (offices) can be changed without planning permission to B8 use (up to 500m2), and B1 use are permitted to change use for a single period of two years to A1, A2 or A3 use. The NPPF states that 'Starter Homes exception sites are expected to be on land that has been in commercial or industrial use, and which has not currently been identified for residential development. Suitable sites are likely to be under-used or no longer viable for commercial or industrial purposes, but with remediation and infrastructure costs that are not too great so as to render Starter Homes financially unviable... Employment land which is being used productively or which is allocated and viable for employment purposes is not to be regarded as underused or unviable'. The Local Plan should be consistent with national policy and legislation so this aspect of policy would apply. However South East Lincolnshire has an oversupply of employment land, therefore loss of under-used or no longer viable land for commercial or industrial purposes should not have significant adverse economic impacts. The Local Plan covers the period to 2036 therefore it is important that the content of Policy 7 and the supporting text is aspirational but deliverable.

Officer Recommendation:

No change required.

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ID1: 424 comment_author: Lincolnshire County Council

comment content:

Strategic Planning Comments In general these proposals are supported, subject to the following comments. Policy 7: Improving South East Lincolnshire's Employment Land Portfolio LCC supports this policy and the Proposed Main Employment Areas. However, employment site SH4 (Food Enterprise Zone, Holbeach) needs to be expanded southwards to incorporate additional land (owned by LCC) to accommodate road access from the A151 via a new roundabout (see attached maps). This roundabout is currently included as part of a planning application submitted by LCC (December 2015). This roundabout would also provide access to Housing Site Hob 048. Access cannot be provided directly to the FEZ from the A17 for safety reasons. It is noted that only four proposed allocations (including the FEZ) are new sites. Of these the location of Q2: The Quadrant, Boston is not clear on the Inset Map.

Officer Comment:

Support for HO002 Holbeach Food Enterprise Zone is welcome. Amedning the site boundary to include the access to the site is reasonable. BO008 Q2 The Quadrant is part of a SUE, for which the masterplan has not yet been agreed. Therefore it is not feasibleat this stage to identify a precise location on the Policies Map. However support for the designation has been made by the developers of the site.

Officer Recommendation:

Change the boundary for HO002 as submitted. HO002 Holbeach Food Enterprise Zone is one of the more suitable Potential employment Sites in Holbeach and should be taken forward as a Preferred Option Employment Site.

ID1: 425 comment_author: Anglian Water Services Ltd

comment content:

Policy 7 includes reference to a number of employment allocations to provide a total of 82ha of employment land. At this stage the scale of employment development on each site is not defined. Therefore we would wish to comment further on the implications of these allocation sites for water and water recycling infrastructure.

Officer Comment:

It is not possible at this stage to identify the mix of uses on each employment allocation - the precise mix will be market led. However further work will be undertaken with Anglian Water to ensure the employment allocations are capable of being delivered in relation to water infrastructure.

Officer Recommendation:

Undertake further discussions with Anglian Water in relation to the infrastructure required for the employment allocations.

ID1: 426 comment_author: Long Sutton Parish Council

comment content:

There is little provision for new employment within the area. Current identified sites for light industry should be better promoted i.e. the Wingland Enterprise Park in Sutton Bridge with developments other than Power Stations and Gasifiers and instead attract more light industry which would have minimal environmental impact and enhance rather than detract from more positive developments in the area such as the forthcoming Marina at Sutton Bridge which in turn could increase the economic development of Long Sutton.

Officer Comment:

The potential employment sites in Long Sutton cover 9.3ha; this is considered to be a suitable amount of land to provide jobs for residents who may choose to live and work in the Long Sutton area, and should appropriately complement the delivery of 580 new dwellings over the plan period. The potential employment sites reflected the availability of land in January 2016. However, additional sites have been put forward to be considered for employment use in Long Sutton which may lead to the mix of sites being re-visited. Land at SB002 Wingland has also been identified for B U se development. Promotion of the sites is not a Local Plan matter.

Officer Recommendation:

SB002: Wingland is one of the more suitable employment sites in South Holland and should be taken forward as Preferred Option Restricted Use Allocation.

ID1:

427

comment_author: Waller Planning

comment content:

SH6: Clay Lake, Spalding We support the identification of Clay Lake as a Main Employment Area. This site has planning permission (H16-0347-11) for a development of 10.5Ha in the B1, B2 and B8 use classes. The Clay Lake site is in an ideal location for industrial and distribution development. It has an excellent connection to the local highway network, from the newly constructed access to the A17. This has sufficient capacity to accommodate a high number of HGV trips. It has been designed on behalf of Ashley King Developments to be suitable to accommodate the needs of not only a 10.5Ha industrial estate, but also traffic from existing businesses, and from the traffic which would be generated by the development of the land to the north. The site's location, which is well separated from the nearest housing, makes it ideal for industrial development, which might otherwise be unsuitable in a location close to existing housing. For this reason, we are concerned about the prospect of residential development taking place close to the site on the land identified on the draft Proposals Map (sites Stm005, Stm015, Stm016, Stm017 and Stm018). Residential development this close to Clay Lake has the potential to be a limiting factor on existing and future businesses. The businesses at Clay Lake are generally successful and locally based, and it is sensible to enable their expansion on to adjacent land. The proposed Main Employment Area on the draft Proposals Map allows for some such expansion, but it leaves an area of land, between the existing development at Clay Lake and the Coronation Channel and Childers South Drove, which we believe is equally suitable for employment use. This land currently accommodates a nursery and

Officer Comment:

Support for Clay Lake is welcome. The SELAA, 2016 identifies that planning permission has been approved for the 10.5ha extension for B uses. The SELAA identifies that the site is 'adjacent to the A16, a strategic north-south route ... each plot has direct access, of varying quality to Spalding Drove, which is a local road. Internal road access is a little disjointed, but acceptable...planning permission for the extension would provide direct access to the A16. The junction is in place but the spine road has not been delivered yet. Its provision would considerably improve access to the site.' So it is not accepted that the Proposed Main Employment Area has an excellent connection to the local highway network, but it is accepted that should the site be developed, direct access to the A16 would be provided. The SELAA identifies that there are a few residential properties interspersed with employment uses along Spalding Drove, but it is accepted that in general Clay Lake is separate from Spalding's housing areas. The land considered was known to be suitable, available and deliverable in January 2016, therefore the northern extension was not considered. The SELAA identifies this site as being suitable because it is located adjacent to an existing Main Employment Area and land with planning permission for B Uses. The access improvements to be delivered with the permitted land would apply to this site. As the take-up of employment land in South Holland is still slow, it is considered that only the wider site would be developed over the plan period. As such this site will not be designated for employment use in this plan period. Enquiries from businesses for Clay Lake is welcome. The developers indicated that a planning application was to be expected

Officer Recommendation:

SP012 is one of the more suitable Potential Employment Sites in South Holland and should be taken forward as a Preferred Option Employment Allocation. SP029 Land to the south of Childers South Drove is not one of the more suitable Potential Employment Sit

various redundant buildings, and it is controlled by Ashley King Developments. We have identified it on the proposed change to the Proposals Map, which accompanies this representation (Drawing 224/201). Ashley King Developments have received a large number of enquiries from major local and international companies in relation to the availability of employment land at the Clay Lake site. These businesses have recognised the potential of the subject site with regards its prominence and accessibility. It is the intention of Ashley King Developments to bring this demand together into a planning application during the spring/summer of 2016, as part of a commercial rebranding of the site as the East of England Industrial Hub. Proposals are also being prepared which would both enable the expansion of existing businesses, such as Fesa, and allow for the development of a new industrial estate on the adjacent land. The proposals for Clay Lake will relate to the land already identified on the draft Proposals Map, and also the additional land to the north which we have indicated. This would provide a site of sufficient size to accommodate a range of industrial and distribution-based businesses. We understand that this development would meet the needs of various identified end-users, and it is entirely deliverable within the early part of the Plan period. Extensive work has already been undertaken in relation to technical investigations and the preparation of a planning application. This includes dialogue with the relevant utilities and highway authorities, District Council Officers and other interested parties. Proposed amendment to Policy 7 We believe that Policy 7 should be amended to allow for greater flexibility on Main Employment Areas such as Clay Lake, to allow the provision of other uses which have a synergy with the site's main B class employment use. These might

spring/summer 2016 is noted, however this has not materialised by December 2016 indicating that the demand for land in this location may be lower or slower than suggested. Pre-application work is noted. It is recognised that these areas can also accommodate other non B uses, however it is appropriate that these should be ancillary to the effective functioning of the area, so as not to dilute the primary purpose of the area. This will also protect the vitality and viability of town centres and support appropriate mixed-use schemes in the area.

include uses such as a café (A3 use), which could reduce the need for employees to drive to find food in breaks in their shifts. It might also include sui generis development, such as industrial processes which fall outside of the definition of a B2 use, or a truck stop. These uses would be entirely appropriate on a site such as Clay Lake, and they would be consistent with the provision of industrial and distribution development. A similar policy mechanism to that proposed at part 3 of the policy would be a sensible way of doing this. SHM3: Lincs Gateway, Spalding We support the identification of Lincs Gateway as an employment location. In particular, we support the identification of this site as a Prestige Employment Site. Background Planning permission (H16-0009-14) has been granted for an employment-led development on this site, incorporating various supporting uses which have a synergy with the main employment use, such as a conference / function centre, a 52 bedroom hotel, pub / restaurant and café. This development was approved on the basis that it would boost the local economy with new jobs, and help it to resist the loss of employment to competing towns. The development is also intended to help diversify the local economy, providing employment in sectors which would be new to the area, and helping to retain more skilled young people in the area. Since the grant of planning permission, over £1 million has been spent on infrastructure to enable this development to take place. Unforeseen technical issues have delayed the site's delivery, but these have now been dealt with, and construction is now underway. The site's position is seen as being key to its future success, as it is at a prime gateway to the town, at the confluence of the A1175 and A16, which bring the majority of traffic to the town from the west (A1) and south (Peterborough).

The site is effectively the first landmark that a motorist sees on approaching the town, and the first landmark development which would be encountered on entering Lincolnshire from the south. The site already has highway accesses in place, and the supporting development is now under construction, whilst a number of end users have also been identified for future phases of development. The vision for Lincs Gateway is that it should go beyond being a conventional B class employment site, but should instead offer office and skills-based development. The proposed supporting infrastructure would meet identified shortfalls in local provision, which currently constrain business development in the town. A landscape-led campus is also envisaged, to provide a high quality environment. The planning permission for Lincs Gateway is flexible, and it allows for any configuration of business uses within the main body of the site, within use classes B1, B2 and B8. Notwithstanding this flexibility, it was always Ashley King Developments intention that the site would be led by office-based development, in use classes B1a and B1b. These are the uses which would represent the high quality employment which is currently under-represented in the District. Creating a Prestige Employment Site In order to deliver a Prestige Employment Site at Lincs Gateway, it will be necessary to create the kind of high quality environment alluded to above. It is therefore desirable that uses which might be bad neighbours, for instance due to their emission of noise or odour, should be located at a reasonable distance from more sensitive office uses. In addition, it became clear during the determination of the planning application for Lincs Gateway that local residents and the Council were concerned about the potential impact of noise and activity from industrial or distribution

development on local residents within Fen End Lane. Similarly, it is important to businesses which involve processes which might generate noise or odour that they should be able to operate free of restraint. With these issues in mind, Ashley King Developments now propose to locate the B2 and B8 uses previously proposed within Lincs Gateway at the nearby Clay Lake site. As we have noted above, Clay Lake is an ideal location for B2 and B8 development. The planning application for Lincs Gateway proposed uses beyond standard B class businesses, such as the hotel and conference centre, on the basis that they could help support a successful business park. We believe that Lincs Gateway also has the potential to accommodate other uses, which would have a synergy with B1a and B1b business development. These would be the type of uses which would benefit from being within a landscaped campus, and in close proximity to knowledge-based businesses. In particular, it is envisaged that education and research uses would be particularly suitable. Other examples of business parks, for instance in university cities, benefit from the close proximity of skilled workers, and the potential to share staff and ideas. This might include the commissioning of specialist tasks from academic staff, or joint working on projects, either of which would be facilitated by close working links and geographical proximity. As an example, there is the potential to build on the strengths of existing businesses in the area, which specialise particularly in food and agricultural technologies. This may, for instance, lead to the opportunity for co-operative research and development between industry and academic institutions. This approach at Lincs Gateway would be consistent with the concept of clusters of similar types of development, advocated in paragraph 4.1.9 of the supporting text to Policy 7. Lincs

Gateway is now being actively marketed, and as with the Clay Lake site, Ashley King Developments have received a large number of enquiries from a range of local, regional and international companies, who are interested in locating their businesses within the site. They have been drawn to the site by the promise of its prominent location and the prestigious style of the proposed development. Proposals are currently being prepared, which will reflect the outcome of these discussions, and seek planning permission for detailed development. This will include a substantial amount of new office floor space, including flexible serviced office accommodation, that could be particularly advantageous to new and developing small businesses. It will also include further complimentary uses, to enable the further development of a knowledge-based business cluster. Complimentary Development The outcome of moving B2 and B8 uses from the site is that a large amount of space is generated, which could be used for alternative uses. Whilst B2 and B8 uses are land-hungry, B1 offices require relatively little land. It is therefore possible to accommodate a large amount of office development at the front of the site, and still provide a large area for alternative forms of development behind this. Capacity for up to 25,000 sq m of office floorspace is envisaged within this area. This would equate to around 2,500 new high quality jobs¹, which would clearly be a great boost for the area. We do not believe that an alternative development behind the offices would detract from the site's essential characteristics as a high quality employment site, provided that it was designed to a suitably high standard, with a similar landscape-led approach to that required for the business park. Alternative uses such as retail or housing would arguably be more appropriate as a backdrop to a peaceful business park than industry

or distribution centres. We have noted in our representations concerning Policies 22 and 24 that the evidence supporting the Local Plan identifies a need for new comparison retail development in Spalding. We have also explained in these representations that there are no realistic sites available within the town centre, or in edge of centre locations. This implies a need for edge of town locations to meet the long-term need for retail development. We believe that Lincs Gateway would be an ideal location for this type of development, provided that it was delivered in a way which was subordinate to the site's primary role as a Prestige Employment Location. We also believe that this is a suitable location for new residential development, and we have made separate representations in this regard. The removal of B2 and B8 uses to Clay Lake would ensure that there were no bad neighbour uses which might make the site unsuitable for residential development. This would also overcome the problems encountered with the planning application, where local residents expressed concern regarding the unsuitability of adjacent uses. A well designed residential development could also be an attractive and entirely appropriate neighbour for a landscaped business park, and it could enable very sustainable travel patterns, with people living and working in close proximity. There may also be an opportunity for Lincs Gateway to accommodate other uses, such as sports facilities. These might be new, or relocated from elsewhere. This type of facility would also be assisted by, and would help to support the provision of, improved public transport links (see below). Ashley King Developments have acquired additional land lying north of Lincs Gateway, and this may, for instance, be suitable for use as sports pitches, with supporting facilities within the Lincs Gateway site.

Sustainable Transport Improvements Diversifying the range of uses within the site could help to deliver a more sustainable form of development. It could, for instance, help to create the higher and more consistent demand to assist the delivery of a bus service to link the site with Spalding town centre, and making it more accessible by non-car modes of transport. It could also help to pay for improvements to the footpath adjacent the B1173, which is currently in a poor condition and in part closed. Lincolnshire County Council have so far concluded that the high cost of repairing this path renders it unviable in their current budgets.

Proposed Amendments to Policy 7 We note that there is a discrepancy in the way Lincs Gateway is identified on the Proposals Map, as an Existing / Proposed Main Employment Area, and the way it is listed in Policy 7, which does not identify it under the Main Employment Area heading. We presume that the Proposals Map will need to be amended to reflect the status of the Lincs Gateway site as a Prestige Employment Location. We have also proposed other changes to the way that the Proposals Map identifies the site, consistent with our representations, and these are shown on the accompanying Drawing 224/301. We object to the proposal in part 3 of Policy 7, to limit uses which do not fall into the B use classes, to a maximum of 20% of the site. This is because, in the case of Lincs Gateway, there is no longer a need for such a large area of employment land, given that the land-hungry uses can be accommodated at Clay Lake. The complimentary uses which are permitted by the existing planning permission relate to the office-based uses within the site, which require only part of the available land. This leaves sufficient space for other types of development, which would be complementary to a high quality business park, and for which there is also a

demonstrable need. We therefore suggest that the policy should be made more flexible, allowing for these alternative uses, and with the proportion of alternative uses permitted on employment sites to be judged on a site-by-site basis, in order to meet delivery needs. SH4: Food Enterprise Zone, Holbeach We support the identification of the proposed Food Enterprise Zone at Holbeach. We believe that this site, together with the Holbeach Technology Campus and Lincs Gateway, has the potential to contribute to the development of a cluster specialising in ancillary education, research and development. The presence of a number of sites such as this, in close proximity to each other, can help to diversify the local economy, providing a broader range of jobs, including those in highly skilled professions. This will be to the benefit of the area, as it can help to retain skilled individuals in the area, and create a more aspirational culture. It can also help to protect the local economy from future recessions. As we have also noted in our representations concerning Policy 2, this additional employment site, coupled with new residential development, can help Holbeach to realise its potential as a more self-contained and sustainable settlement. Quantum of Employment Land We support the approach proposed by the draft Local Plan, to over-provide employment land against the requirement indicated in the Employment Technical Paper. As with housing land, where a buffer is required to ensure delivery of a lower target, it is necessary to aim for an overprovision in employment land, in order to ensure that a lower target is delivered.

ID1: 428 comment_author: Mr S Walton

comment content:

has submitted land that lies between Long Sutton and Little Sutton for residential or commercial development. It is between 64 and 90 Bridge Road and wraps around 74 - 82 Bridge Road. This is an implied objection to the settlement boundary for Long Sutton and Little Sutton and the approach taken by this policy

Officer Comment:

A significant area of land has been submitted by parcel: LO009 Land to the south of Bridge Road: The site's eastern frontage looks to be wide enough to accommodate a suitable access and there is suitable visibility in both directions. Bridge Road is the old A17 so is of a suitable standard to be able to accommodate the vehicular activity associated with a B1 B2 and B8 use on this site. LO009 would provide a cluster of employment uses, being in close proximity to the established Bridge Road Industrial Area and the Princes site. LO010: Land to west of Hundreds Lane: The northern part of the site could be satisfactorily accessed from Bridge Road. The southern part of the site to the south of the existing Hundreds Lane access to the food processing site has a 7.5 tonne maximum weight limit. Some substantial improvement works would be required on Hundreds Lane and potentially to the A17. LO011: Land to the east of Hundreds Lane: The new site to the south of the existing food processing site could be developed as an extension to the existing factory but there is a 7.5 tonne maximum weight limit on Hundreds Lane (to the south of the existing Hundreds Lane access to the food processing site). If access were to be formed there, some substantial improvement works would be required on Hundreds Lane and potentially to the A17. LO010 and LO011 would also have an adverse impact upon the countryside character of the area. Both sites are also likely to have significant opening up highways infrastructure costs, which would need to be borne by a developer. These sites are therefore considered to be undevelopable in this plan period.

Officer Recommendation:

New site LO009 south of Bridge Road is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Employment Allocation. LO010 Land to west of Hundreds Lane and LO011 Land to EAST of Hundreds

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ID1: 429 comment_author: Brian Collins-McDougall

comment content:

The West Bank Business Area should be re-designated to allow residential development as requested by Sutton Bridge Parish Council. An opportunity exists to enhance the area with good quality housing next to the marina (planning approval given) and the golf course. The Industrial Area North of Port Sutton Bridge is not suitable for further industrial development unless a new access road is built. Neither New Road or Petts Lane are suitable for more heavy goods vehicles.

Officer Comment:

The SHLAA identifies this site 'is currently in a variety of commercial uses, and its owners have not been identified. The owners intentions for their land are unknown, and consequently the site cannot be considered as available.' Therefore the site cannot be identified for housing in the Local Plan. SB003: Sutton Bridge Port The SELAA acknowledges that access improvements may be required depending on the development that takes place at Sutton Bridge Port. However as the planning permission for the extension has been implemented it is reasonable to allocate the site in the Local Plan.

Officer Recommendation:

SB003 Sutton Bridge Port is one of the more suitable employment sites in South Holland and should be taken forward as a Preferred Option Restricted Use Allocation.

ID1: 430 comment_author: Robert Doughty Consultancy Ltd

comment content:

Our client's yard is identified under Policy 8 as a Specific Occupier and Restricted Use Sites. We would make the point that the site is actually an agricultural farmstead consisting of concrete hard standings and agricultural sheds used for grain drying. As a matter of course agricultural uses do not usually attract specific employment protection policies and this is especially so in the case of our client's farm, as there is virtually no one employed full-time at Home Farm (Deeping St Nicholas). The site does not benefit from any planning permissions which seek to change the use of the site to any of the three uses set out in Policy 8 and there is only one owner-occupier farming company on site. We therefore consider that the identification of the site under Policy 8 is incorrect

Officer Comment:

It is accepted that the existing operation is agricultural use and not B Use development. It cannot be classified as employment generating use either. Therefore the site cannot be classified as suitable, available or deliverable for employment purposes in the Local Plan.

Officer Recommendation:

DE004 Home Farm is not one of the more suitable Potential Employment Sites in South Holland and it should not be taken forward as a preferred Option Employment Allocation.

ID1:

431

comment_author:

Clowes Developments North Wes

comment content:

Whilst not referred to in the Policy or supporting text, the Horncastle Road site is identified as a Policy 8 site on the proposals map. Given the fact that Norprint and Magnadata will have vacated the site during the summer of 2016, Clowes Developments (North West) Ltd would like to see the proposals map amended to show both sites as residential development sites to reflect the current planning applications. Clowes Developments (North West) Ltd believe that residential use is a more appropriate use for the site given its size and location. In addition, the site is able to address the current 5 year housing land supply shortage, whilst not undermining the employment land supply situation where Boston Council is understood to have a surplus.

Officer Comment:

It is accepted that the Norprint site, Norfolk Street is not vacant at present. The Employment Land Technical Paper, 2016 identifies that 'the building [on Norfolk Street] is extremely poor quality and would require significant upfront investment to either upgrade to meet modern business needs or to demolish and rebuild, which may also lead to remediation works and additional costs. As a result the site has attracted little market interest for sale/let. De-allocate the site for employment use and let the market dictate the future direction of the site in the long term. Could be appropriate for an alternative use.' this supports the owners' intentions for the site. An outline planning application for residential use is pending. Confirmation that the Horncastle Road site is no longer available is noted. An outline planning application for residential use is pending.

Officer Recommendation:

BO010 Norprint is not one of the more suitable Potential Employment Sites in Boston Borough and it should not be taken forward as a Preferred Option Employment Allocation.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1:

432

comment_author: Cushman and Wakefield

comment content:

Draft Policy 8 relating to Specific Occupier Sites states that the unique role of Specific Occupier Sites and Restricted Use Sites will be managed by: safeguarding a range of sites, as identified on Policies Map, to be retained in employment use by their parent company(ies), where planning permission will be granted for business (Use Class B1), general industrial (Use Class B2) and storage and distribution (Use Class B8) uses, and initiatives to improve (through refurbishment; subdivision or replacement) existing buildings, to support their long-term operation. The above policy only makes provision for the refurbishment, subdivision or replacement to improve existing buildings. This does not allow the extension or intensification of use and, so the policy acts as an artificial break on the growth of business on these sites will limit growth of employment and force successful businesses to look elsewhere if their floor space needs increase. Whilst the intention of the policy seems to be to support continued and increased employment use on these sites, the wording appears restrictive and suggests that a change of ownership would require planning permission and limit the future development potential of the site. Clearly, if the Specific Occupier Site was in D2 use and bought by another company with intention to continue D2 use, this would not constitute development (as defined by section 55 of the Town and Country Planning Act 1990) and planning permission would not be required. Similarly, should this new company wish to carry out works or improvement to the site which would require planning permission, these should not be prejudice on the basis that the specific occupier has changed since

Officer Comment:

The intention of Policy 9 is to support the continued operation and intensification of use on Specific Occupier Sites. However, it appears that the details of the policy approach should be re-visited. The land identified reflected the information available in 2015. Since the adoption of the 2006 Local Plan national policy has changed significantly; allocated sites should be suitable, available and deliverable over the plan period. WE001 Flamingo Flowers: planning permission for the adjacent site expired in 2008 indicating a lack of interest for development in this location. No evidence has been submitted to suggest that the owners intend expanding the current site. The policy approach will ensure that should the owners wish to expand then there is sufficient flexibility in the Local Plan to do so.

Officer Recommendation:

WE001 Flamingo Flowers is one of the more suitable Potential Employment Sites in South Holland and it should be taken forward as a Preferred Option Established Employment Site. Amend Policy 7 to ensure that there is a positive, flexible framework within w

the site was designated. Therefore, although we support the intension of the policy to enable development and attempt to retain employers within the area, we object to the wording which appears restrictive in terms of the legal ownership which is not a planning matter. The use, and continued use of the site should be seen as important and reflected in the policy rather who the occupier of the site is. Although the ownership has recently changed on the Flamingo Flowers sites (formally Finlay Flowers) the use has remained and is being strengthen, the policy should not dissuade this from happening in the future to other sites in the area. Weston: The southern part of the Weston site is designated as a Specific Occupier Site . The proposals map shows this designation as only relating to the built element of the site rather than the site as a whole. The currently undeveloped part of the site, located to the northeast of the existing development, had outline planning permission granted in 2000 and extended in 2003 to expand the existing business. This permission included substantial new buildings on the undeveloped part of the site. Although this permission was never implemented and has now expired, it shows that the site should be considered as a whole with the same designation so as not to harm future growth opportunities. As such, we object to the proposed Specific Occupier Site boundary and contend that this should be expanded to include the entire Flamingo Flowers site rather than just the built element. This will provide confidence in the future growth potential of the business in this location and reflect a previous planning assessment that this is a suitable site for expansion.

Post_title: 4.3 Spalding Rail Freight Interchange

ID1: 433 **comment_author:** Mr Ronald G Meredith

comment_content:

The proposed Interchange rail hub, if it were ever to be built wherever, will cause road traffic congestion . Even if dedicated roads are provided for the site, further problems will arise at the multitude of level crossings in our area, even with the proposed by pass,(7 between Spalding & Donington serving local communities). However, while this will be a recognised inconvenience, any enhanced passenger services might reduce the number of cars needing to use these crossings and thus the problem.

Officer Comment:

It is inevitable that a development of the size of the RFI will generate additional traffic movements. A development of this scale would need to be accompanied by a Transport Assessment to determine the approach to access and any mitigation required. There are no plans to enhance passenger services at the present time.

Officer Recommendation:

DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.

ID1: 434 **comment_author:** Natural England

comment_content:

We note that an Environmental Impact Assessment will be required on this site. We would be particularly concerned with any potential water related links with the proposed site to Baston Fen Special Conservation Area (SAC) (and Baston Thurlby Fens SSSI); Cowbit Wash SSSI; and Cross Drain SSSI.

Officer Comment:

The the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in the Local Plan.

Officer Recommendation:

DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1:

435

comment_author:

Spalding Peterborough Transport

comment content:

The principle of a rail hub is a good one if in the right location as it reduces long distance road traffic overall, and thus air pollution and carbon dioxide emissions. Projects on a smaller scale have proven to be of benefit, based on evidence both nationally and internationally hubs have been oversized and under used. The area identified as the current preferred site cannot sustain this size of development. The land selected for all four possible sites by SHDC three of which are in Deeping St Nicholas and one Gosberton Cheal are grade 1 and 2 agricultural land which under the RSS 8 Regional spatial strategy should be protected where possible. Farmland accounts for over 50% of veg salad bulbs and flowers with an estimated value of £470 M (2010) and should be protected wherever possible. The A16 A1175 A17 A52 roads serving Peterborough Lincoln Boston Kings Lynn are all single carriage way not designed for the amount of expected HGV traffic into the area. The new bypass announcement Feb 2016 would make Donnington now a more viable option if were to go ahead in this area. However I would challenge this needs to be in the SELP due to no investor has come forward in the last ten years. HGV from Felixstowe to this area is a cheaper option for businesses. The bridge across the river Nene has problems with the foundations (not in place correctly when first constructed) and already carries maintenance costs for existing traffic. The proposed increased HGV movement will increase these costs. LCC cannot meet the demand of keeping the roads in the area in good repair. Deeping St Nicholas is a village which joins two bypasses and could have been considered for a bypass over 10 years ago where

Officer Comment:

The the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in the Local Plan.

Officer Recommendation:

DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.

suggestions were made by locals which would have reduced the travelling on the route by a third for the new A16 road users formally the A1073. To support an international interchange , consideration for a hub would be more vialble if a more appropriate site in Spalding or surrounding area could be found and were proposed on a smaller scale should an investor come forward before close of the SELP. Location I.e nearer Boston and not on the scale proposed by SHDC and Not on Graded agricultural land. Peterborough is the most sensible option for a development this size with the infrastructure in place with 4 lane carriageways to the A1. Peterborough also houses the two largest warehouses in Europe on the Magna Park site. Boston is a port and already serves the East Midlands well within two hours and has planned improvements to the infrastructure which have been announced Feb 2016 to go ahead. Boston has been highlighted in the state of freight strategy as one of the preferred locations to host a rail hub.

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ID1: 436 comment_author: Louise McGuinness

comment content:

The principle of a rail hub is a good one if in the right location as it reduces long distance road traffic overall, and thus air pollution and carbon dioxide emissions. Projects on a smaller scale have proven to be of benefit, based on evidence both nationally and internationally hubs have been oversized and under used. The area identified as the current preferred site cannot sustain this size of development. The land selected for all four possible sites by SHDC three of which are in Deeping St Nicholas and one Gosberton Cheal are grade 1 and 2 agricultural land which under the RSS 8 Regional spatial strategy should be protected where possible. Farmland accounts for over 50% of veg salad bulbs and flowers with an estimated value of £470 M (2010) and should be protected wherever possible. The A16 A1175 A17 A52 roads serving Peterborough Lincoln Boston Kings Lynn are all single carriage way not designed for the amount of expected HGV traffic into the area. The new bypass announcement Feb 2016 would make Donnington now a more viable option if were to go ahead in this area. However I would challenge this needs to be in the SELP due to no investor has come forward in the last ten years. HGV from Felixstowe to this area is a cheaper option for businesses. The bridge across the river Nene has problems with the foundations (not in place correctly when first constructed) and already carries maintenance costs for existing traffic. The proposed increased HGV movement will increase these costs. LCC cannot meet the demand of keeping the roads in the area in good repair. Deeping St Nicholas is a village which joins two bypasses and could have been considered for a bypass over 10 years ago where

Officer Comment:

The the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in the Local Plan.

Officer Recommendation:

DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.

suggestions were made by locals which would have reduced the travelling on the route by a third for the new A16 road users formally the A1073. To support an international interchange, consideration for a hub would be more viable if a more appropriate site in Spalding or surrounding area could be found and were proposed on a smaller scale should an investor come forward before close of the SELP. Location i.e nearer Boston and not on the scale proposed by SHDC and Not on Graded agricultural land. Peterborough is the most sensible option for a development this size with the infrastructure in place with 4 lane carriageways to the A1. Peterborough also houses the two largest warehouses in Europe on the Magna Park site. Boston is a port and already serves the East Midlands well within two hours and has planned improvements to the infrastructure which have been announced Feb 2016 to go ahead. Boston has been highlighted in the state of freight strategy as one of the preferred locations to host a rail hub.

ID1:	437	comment_author:	Deeping St Nicholas Parish Council
comment_content:	Officer Comment:	Officer Recommendation:	
Finally the Parish Council would like to make it known that they are against the proposal stated in Policy 9 with regard to the rail-freight interchange being situated to the east of Deeping St Nicholas. This objection is based on the loss of agricultural land which is clearly important to the local economy and as mentioned in the draft document 'the site would generate some adverse traffic and noise pollution as well as the area suffering some visual and ecological impacts'.	The the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in the Local Plan.	DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.	

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ID1:

438

comment_author:

Spalding and District Civic Society

comment content:

We had hoped for a rather more rigorous examination of this scheme. It's adverse social and environmental effects are acknowledged (4.3.10), most of which cannot be removed by an Environmental Impact Assessment. It will not reduce local HGV traffic, but increase it if anything, and creating 4,400 jobs on a site that is in effect out in the middle of the countryside will hugely increase car use, contrary to policies elsewhere in the plan. It is the reverse of sustainable.
4.3.7 Strengthen. Replace 'will be resisted' by 'will not be allowed'.

Officer Comment:

The the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in the Local Plan.

Officer Recommendation:

DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.

ID1:

439

comment_author:

Lincolnshire County Council

comment content:

Public health Comments The policies are positive about high skilled, high value employment, which is welcomed given the impact job creation has on the wider economy and more specifically on health and wellbeing outcomes for individuals, promoting mental wellbeing, for example. Policy 9 (Spalding Rail-Freight Interchange) is recognised as a good thing to reduce emissions from road transport.

Officer Comment:

Support for Policies 7-10 is welcome. Support for DE002 Spalding Rail Freight Interchange relating to reduced carbon emissions is noted.

Officer Recommendation:

DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.

ID1: 440 **comment_author:** Anglian Water Services Ltd

comment content:

Policy 9 includes reference to an allocation of 112ha for strategic rail interchange. It is expected that the development of this site will be long term but no indication is given for the expected timing of when construction will start or how the development will be phased over time. It would be helpful if the Local Plan outlined the expected phasing of this strategic site. We would welcome further discussions with the Local Plan Team regarding the expected phasing for this site to inform Anglian Water's long term forecasting and our business planning process.

Officer Comment:

The the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in the Local Plan.

Officer Recommendation:

DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.

ID1: 441 **comment_author:** Mike Harrison

comment content:

The provision of a rail freight terminal has been tried with many objections. However with the upgrading of the local main railway route it is pointless to spend millions on roads mainly for lorries when all this freight could be transported in a safe less polluting system, the railway. An example of road unsuitability is the total destruction of the road surface of Clapton Gate by 2 seasons of sugar beet lorries using it. So this is another reason to put freight on railways.

Officer Comment:

The the detailed evidence required to demonstrate suitability, availability and deliverability of the site has not been submitted, therefore the site is no longer able to be promoted for a rail freight interchange and related employment use in the Local Plan.

Officer Recommendation:

DE002 Spalding Rail Freight Interchange is not one of the more suitable Preferred Employment Sites in South Holland and it should not be taken forward as a Preferred Option Employment Site.

Post_title: 4.4 Employment Development in the Countryside

South East Lincolnshire Local Plan 2011-2036 Draft for Consultation January 2016

ID1: 442 comment_author: Paul Tame

comment_content:

We like policy 10 on employment in the countryside. In paragraph 4.4.6 however, you mention redundant farm buildings but we would not want the development opportunity limited to redundant farm buildings. As I m sure you realise farm buildings can always be used to store something and are rarely totally redundant, just not used for their original purpose. It would be a pity to put a strict interpretation on this requirement.

Officer Comment:

Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF.

Officer Recommendation:

Amend Policy 10 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.

ID1: 443 comment_author: Sutton Bridge PC

comment_content:

Policy 10 / Section 4.4 - Employment Development in the Countryside ~ The definition provided on page 36 is totally open ended; accommodating virtually all eventualities which could result in major changes to the areas defined for employment.

Officer Comment:

Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF.

Officer Recommendation:

Amend Policy 10 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.

ID1:

444

comment_author:

Country Landowners Association

comment content:

In Policy 10: Employment Development in the Countryside reference is made to conversion of buildings larger than 500 square metres to alternative uses. This is not a sensible limit as many buildings are no longer suitable for modern agricultural purposes by virtue of their small size and are therefore considered for conversion to an alternative use. We feel that this paragraph should be amended to only make reference to redundant farm buildings rather than setting a definitive size limit. We also have concerns about the requirement for a business plan to accompany applications to convert such buildings. This is not practical as many buildings will be converted with a view to leasing to a third party. Many of the items mentioned for inclusion in the business plan will also be covered within the Design & Access statement. In Policy 10, Policy 20: Conversion of Redundant Rural Buildings to Residential use and Policy 21: Agricultural, Forestry & Rural Workers Dwellings mention is made of sustainable development in terms of highways impacts. Whilst the CLA accepts that the concept of Sustainable Development is hard to apply, it is a well known fact that rural areas have been allowed to suffer from too narrow an interpretation with unfortunate outcomes for rural businesses and rural communities. Many rural communities now find themselves defined as unsustainable in local plans and therefore unable to provide new employment space, create new jobs or new homes, all of which greatly harms the rural community's capability of aiding in the retention of local services or reinstating those that have had to close. As CLA members are all too well aware, the use of the private motor car or haulage vehicles in rural

Officer Comment:

Any agricultural buildings under 500sqm are permitted to change to a flexible commercial use (A1, A2, A3, B1, B8, C1 or D2) subject to prior approval. Therefore to be consistent with national guidance, Policy 10 can only apply to larger agricultural buildings. It is accepted that the requirement for a business plan may not be practicable in every situation.

Officer Recommendation:

Delete from Policy 10 the requirement for a business plan to be submitted with a planning application.

areas is a necessity as there are, generally, no other options. Unfortunately all too often planning authorities continue to use the increase in private vehicle usage in rural areas as a reason for turning down rural economic development proposals. We would therefore like to see these policies re-worded so that well-considered developments are not recommended for refusal because of insurmountable problems with rural modes of transport.

ID1:

445

comment_author:

Robert Doughty Consultancy Ltd

comment content:

we support the inclusion of Policy 10, which supports ongoing investment in food and farming operations across South East Lincolnshire. The emphasis of the policy, however, appears to be focussed on the re-use of agricultural buildings for other uses, with employment use and holiday lets being implied as appropriate uses by the wording of the policy. Food and land businesses are significant employers in their own right, a fact acknowledged by the justification text which states that 40% of employment is in the rural area. The policy does not seem to acknowledge the opportunities that may be presented by investment by existing and new businesses, which will support and enhance food and farming business. The policy should be amended to also enable new development, including new large buildings to house processing plants and storage units, to support rural businesses in the countryside and should not be restricted to the re-use of redundant buildings. Many businesses are required by circumstances to employ significant numbers of staff on a seasonal basis. The local workforce is not able to provide the numbers of staff required and, as such, businesses are required to employ workers from outside the area. As a consequence, the employers also need to provide temporary accommodation for workers, accommodation which may not be occupied all year round but is required year on year and as such has a permanent presence. This includes internal road layouts, service blocks, small shops, launderettes etc in addition to the accommodation itself. Although the accommodation itself may be in the form of caravans, it may also take the form of permanent buildings. Policy 7

Officer Comment:

Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF.

Officer Recommendation:

Amend Policy 10 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.

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should also be amended to provide support and guidance for the provision of such accommodation to support rural businesses.

ID1:	446	comment_author: Hume Planning Consultancy Ltd	
comment_content:	Officer Comment:	Officer Recommendation:	
Appropriately located and diverse employment opportunities should be extended to the villages, where compatible with sustainable development and thereby reflecting the Framework at paragraph 28. In this respect, the provisions of Policy 10 are welcomed.	Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF.	Amend Policy 10 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.	

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ID1:

447

comment_author:

Robert Doughty Consultancy Ltd

comment content:

We have been instructed to consider the Consultation Draft of the Local Plan, in particular to review its approach to tourism and to make representations in regard to land which he wishes to use for tourism purposes with the construction of a number of timber holiday lodges. On considering the Draft Local Plan it was unexpected to find little in the way of guidance for the development of tourism. It seems that as South East Lincolnshire has little in the way of conventional seaside coast, when compared with its neighbours in East Lindsey and West Norfolk, and is primarily recognised for its contribution to agricultural production, there is little need to consider the development of appropriate policy to guide landowners and potential developers who might wish to encourage tourism. This is not the case The Draft Local Plan recognises that the interlinked waterways which have historically managed the drainage of South East Lincolnshire area now represent a resource with a, largely unrealised, potential for recreation and tourism It also recognises that the immediate coastal area supported by environmental designations such as the multi-designated Wash, provide substantial year round attraction for visitors such as walking, and birdwatching. Indeed, the Vision for South East Lincolnshire (2.2, page 6 of the public consultation draft) anticipates that by 2036 the natural, built and historic environment will have been protected and enhanced to ensure that the area's inherent social, economic and environmental qualities are retained and that opportunities for sustainable tourism can be realised" while Strategic Priority 4 Economy (2.3, page 7 of the public consultation draft) seeks to provide the

Officer Comment:

Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment, employment generating and tourism uses in the countryside should be provided, consistent with the NPPF. However it is not necessary to identify a site for holiday lets, it is considered that such schemes should be assessed against the relevant Local Plan policies during the planning application process.

Officer Recommendation:

Add new Policy 10 relating to the visitor economy.

right conditions and sufficient land in appropriate locations to help diversify and strengthen the economic base of South East Lincolnshire to maximise the potential that historic and environmental assets can have for sustainable tourism. While the countryside of South East Lincolnshire is a finite resource for agriculture, not all of it is classified as the best and most versatile land of the Agricultural Land Classification Grades 1 " 3a, and not all is in agricultural use. Paras 3.2.19 (page 16 of the consultation draft) and 4.0.1 (page 27) confirm that there are types of development that require a countryside location and that the rural economy is now supported by a greater diversity of businesses, including tourism. The Draft Local Plan Policy 10 provides a framework for diversification schemes to support agricultural and other land "based rural businesses. However, there are other sites throughout South East Lincolnshire which do not fall within that designation but which could provide small and discrete locations for tourism use ~ such as a low number of timber holiday lodges, holiday or touring caravans. We appreciate that it would be difficult to designate land for such use, although we would refer you to our client's land as shown on the attached plan as a possible designated site, and so we propose that consideration should be given to an additional policy or a modification of the proposed Policy 10 to encourage and enable owners of suitably located small areas of land, not in agricultural use, to develop rural tourism sites providing small numbers of units for holiday use. Small numbers of units are less visually intrusive than large sites, and are often more popular with users. A policy of this nature will enable owners of small areas of countryside, such as paddocks and sites which are unsuitable for intensive agriculture, to contribute to the rural economy and provide accommodation for visitors

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who wish to have the opportunity to visit a variety of different locations in both South East Lincolnshire and the more distant attractions of East Lindsey and West Norfolk.

ID1: 448 comment_author: Chestnut Homes

comment_content:

We welcome this specific policy relating to potential employment development in the countryside. South East Lincolnshire area is particularly rural in nature and hence warrants specific policies to deal with the potential diversification in rural areas, as well as the re-use of agricultural buildings or sites where appropriate. We would suggest that this policy needs to be extended beyond purely diversification schemes and acknowledge the circumstances where existing buildings or farms are no longer economically viable and hence need alternative uses to be considered.

Officer Comment:

Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF.

Officer Recommendation:

Amend Policy 10 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.

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ID1: 449 comment_author: RPS CGMS

comment content:

The title of Policy 10 refers to general employment development but its contents relates only to the diversification schemes to support agricultural and other land-based rural businesses . It d s not make reference to industrial businesses or other employment-generating sites. This lack of clarity and failure to recognise certain business sectors located in the countryside g s against Paragraphs 28 and 157 of the NPPF. The reasoning applied to Policy 7 above is valid also here. Proposed changes: - Amend the first paragraph of Policy 10 as follows: Outside the areas identified in Policies 7, 8 and 9, proposals for diversification schemes to support agricultural, industrial and other land-based rural businesses, in agricultural buildings of 500sqm or more, or other sites or buildings, will be supported where: [;] Dr - Change the name of the policy to Agricultural and land-based rural businesses development in the countryside and add a new policy covering other businesses development in the countryside We submit that the draft South East Lincolnshire Local Plan is unsound because is not consistent with national policy. More specifically, it fails to comply with paragraphs 17, 28, 47, 48, 50, 54, 111, 157 and 159 of the National Planning Policy Framework. For this reason, we invite the Local Planning Authority to review, revise and modify the South East Lincolnshire Local Plan to address the issues set out in the precedent paragraphs.

Officer Comment:

Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF.

Officer Recommendation:

Amend Policy 10 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.

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ID1: 450 comment_author: Cushman and Wakefield

comment content:

The first bullet point [of Policy 10] suggests that a sequential approach should be taken with regards to employment development. The policy sets the parameters within which to search for suitable buildings as a settlement – however, it is not clear what is meant by this in practice and parameters should be more clearly defined. It is suggested that the third bullet point should be reworded to the following: The proposal is of a scale appropriate to its location, adjacent to existing premises and of a scale appropriate to its purpose. The existing wording has of a scale appropriate to its location and appropriate to the existing location this is, in effect a repetition of the same requirement. The fourth bullet point states that the proposal should be of a high standard of design. We suggest that this is changed to a suitable level of design. It may not be necessary for all land-based rural businesses to achieve a high standard so this alternative wording would allow flexibility and adequate design solutions to be found for the specific circumstances.

Officer Comment:

Policy 10 relates to agricultural diversification. However it is accepted that a more robust approach to employment sites in the countryside should be provided, consistent with the NPPF.

Officer Recommendation:

Amend Policy 10 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.

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ID1: 451 comment_author: Lincolnshire Wildlife Trust

comment content:

The Lincolnshire Wildlife Trust objects to this policy as there is no consideration of biodiversity. Existing agricultural buildings often have value for protected or priority species and this should factor into the decision making process as to whether such development is appropriate or not. In order to make this policy more consistent for example with policy 20, an additional bullet should be added to specify that ecological surveys will be required where there is a potential for protected species to be present. We would suggest the addition of: 9. The results of ecological surveys indicate that there will be no significant adverse impacts on protected or priority species.

Officer Comment:

Policy 25 provides the framework for assessing impacts upon the natural environment. It is considered that Policy 25 will adequately address the impacts of biodiversity raised through development in the countryside.

Officer Recommendation:

No change required.

ID1: 452 comment_author: Spalding and District Civic Society

comment content:

5 Add tranquillity to 'character' and 'appearance'
Delete 'where practicable'
4.4.7 Admirable and very important. We wonder, therefore, if the essence of its second sentence could be incorporated within the policy itself
4.4.8 Second sentence: add tranquillity to 'character' and 'appearance'
Third sentence: replace 'will be resisted' by 'will not be allowed'.

Officer Comment:

Not all sites will be tranquil, therefore requiring tranquillity may be difficult to achieve. It is not possible to prevent all development on Grade 1 and 2 agricultural land. Therefore flexibility is required should an appropriate scheme come forward. Support for 4.4.7 is welcome.

Officer Recommendation:

Amend Policy 10 to ensure compliance with the NPPF relating to employment outside of allocated or protected areas.

ID1:

453

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Greater Lincolnshire Nature Partn

comment content:

Object The GLNP object to the lack of consideration for the natural environment in this policy. Existing rural or agricultural buildings are likely to be important for a number of protected or priority species. Not only is this absent from the policy but it is inconsistent with other policies in this plan that do mention species and the need for an ecological survey, Policy 20 for example. The GLNP recommends the addition of the following wording: An ecological survey will be required where it is likely that legally protected or priority species are present ☒

Officer Comment:

Policy 25 provides the framework for assessing impacts upon the natural environment. It is considered that Policy 25 will adequately address the impacts of biodiversity raised through development in the countryside.

Officer Recommendation:

No change required.