

**Post\_title: 5.0 Policy Context**

**ID1:** 454

**comment\_author:** Mr Graeme Smith

**comment\_content:**

The Local Plan period is indicated as 2011-2036 with no supporting text as to why this deviates from the National Planning Policy Framework Paragraph 157 preferred 15 year timescale.

**Officer Comment:**

The NPPF 15 year timescale is considered to be a minimum requirement. It is also generally accepted as a timescale which runs from the date of adoption.

It is also normal to include a period preceding the preparation of the Local Plan of five years in order to take into account outstanding development commitments made through planning permissions to give an accurate account of how future developemnt needs will be met.

Whilst the plan period of 2011-2036 is for 25 years by the time the Plan is adopted the timespan will be, effectively, 19 years (from 2017 - 2036). Local Plan reviews are also advocated by the same paragraph of the NPPF.

**Officer Recommendation:**

No change to the Policy is recommended

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

ID1:

455

comment\_author:

National Custom & Self Build Asso

comment content:

This letter includes The formal comments from the National Custom & Self Build Association (NOCSBA) to the South East Lincolnshire Local Plan Consultation. This response document will explore the draft document's consideration of custom and self- build matters. This representation will consider The South East Lincolnshire Local Plan in The context of The Tests of Soundness, against which The plan will be considered at examination. These tests are: i. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements 2. Justified: The most appropriate strategy when considered against The reasonable alternatives, based on proportionate evidence 3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities 4. Consistent with notional policy: enabling The delivery of sustainable development Policy Requirements Paragraph 50 of the National Planning Policy Framework (NPPF) sets out the requirement for Local Planning Authorities (LPA) to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state (underlining is our emphasis): Plan for a mix of housing based on current and future demographic Trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes) In addition to the above, paragraph T59 of the NPPF considers the requirement for LPAs to have a clear understanding of housing needs in their area. They should therefore ensure that their policy documents:

Officer Comment:

The Local Plan is being prepared with the expectation that it will be "sound". The policies and proposals are considered to address the housing needs of the area in a proportionate way and, in no way, inhibit self builders from securing a significant number of development opportunities within the plan area and having an application considered positively.

A Local Plan should be prepared and planning applications decided without any prejudice with regard to the status of the landowner or applicant.

Prior to any recognition of self builders as requiring a specific housing need to be met the opportunities for self building in Boston Borough and South Holland will have been realised.

Officer Recommendation:

No change to the policies of the Local Plan is recommended.

Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes) Brandon Lewis MP, in his role as Minister of State for Housing and Planning made the following comments in a letter sent to all Local Planning Authorities in March 2015: We all need to do more to address the lack of suitable plots of land being made available, and we believe that local planning authorities have a vital role to play. The letter went on to say: National planning policy and guidance is clear that local planning authorities should identify and plan for local demand for custom and self build housing. Planning inspectors will want to see evidence that consideration of demand for custom and self build housing has been taken into account when they examine Local Plans. Failure to provide sufficient evidence may lead to plans being found unsound." This communique from the Department of Communities and Local Government could not be any more explicit in its requirements for LPAs to plan for the needs of those that wish to build their own home. The Self-build and Custom Housebuilding Bill received Royal Assent on 26 March. The Bill is now an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. It is understood that the South-East Lincolnshire councils have yet to comply with the legislation and keep a register of those in the plan area that wish to build their own home. The above comments from the Planning Minister and the emerging Right to Build legislation clearly demonstrate how the government intended

LPA's to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPA's should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPA's that do not do so can expect their Local Plans to be found unsound at examination.

**Critique of Evidence Base** The evidence for housing needs within the Local Plan evidence base appears to be centred on 2 documents: - Peterborough Sub-Regional Housing Market Assessment - Boston Borough Strategic Housing Market Assessment Neither paper makes any specific reference to custom- and self-build which indicates that the needs of custom- and self-builders have not been considered as part of the plan production process. Indeed, there is no indication that the council have tried to determine the demand for custom- and self-build in the plan area. As a consequence it is considered that the plan cannot be said to be justified as there has been no visible attempt to establish the demand for custom or self-build within the plan area. This is clearly at odds with the March 2015 letter from Brandon Lewis MP.

**Critique of Pre-Submission Plan** There are a number of policies which cover housing and none of these policies make any provision for custom- or self-build: - Policy 13: A Sustainable Urban Extension for Spalding sets out 'The details of the development to be built on land to the north of Vernatt's Drain. As well as the infrastructure required the policy specifies that affordable housing will be required in line with Policy T5 and that the site will provide a range of dwelling types and sizes to deliver a balanced community over the lifetime of the development'. There is no requirement for the provision of any self-build plots on the entire 4,000 dwelling development however. - Policy 14: Providing a Mix of Housing stipulates 'The size

and Tenures of housing that new residential developments should consist of but includes no requirement that new large residential developments should include a percentage of self-build plots. - Policy 15: Affordable Housing stipulates The number of new affordable homes that should be built over the plan period in the plan area and how they should be delivered, however if d s not include the provision of any version of affordable custom- or self- build. - Policy 16: Rural Exception Sites d s not include affordable custom- or self-build as a form of residential development that would be considered in areas where the development of market housing would not normally be considered appropriate. It is apparent therefore that the plan makes no attempt to meet the needs of those that wish to build their own home, despite The NPPF clearly stipulating that new local plans should do just that. As a consequence the plan cannot be said to be positively prepared as there is no attempt to meet the needs of all of The community, specifically those that wish to build their own home, nor can it be said To be consistent with national policy since The NPPF states that local plans should look To plan for a mix of housing based on present and future demographics, market trends and the needs of different groups in the community including people who wish To build Their own homes . The South-East Lincolnshire Local Plan will provide a minimum of 310 affordable dwellings per year with further affordable units provided via rural exception sites. Since the need from newly formed households in Boston Borough alone is 318 per annum it is apparent that the amount of affordable housing that will be provided by The plan in its current guise would be insufficient. It is considered that further measures should be introduced to encourage the creation of new affordable homes in

the plan area. The plan does not for example allow custom- or self-build on rural exception sites, which would provide a more affordable route for those that are unable to afford a new home on a new development at market prices and who are unable to secure an affordable home. Therefore the plan cannot be said to be positively prepared or justified.

Conclusions 1. The council has made no attempt to assess demand for self-build. The plan has therefore failed the test of soundness in terms of being positively prepared and consistent with national policy. Custom- and self-build demand within the plan area must be properly assessed. 2. Although There is no evidence for demand for custom- and self-build in the plan area, it is inconceivable that in South-Lincolnshire there is 0% demand for custom or self-build from its population. The plan cannot therefore be said to be positively prepared or justified. The demand should be assessed, but if it is not assessed it must be assumed that there is some demand there. A requirement for large developments to include the provision of a percentage of self- build plots (perhaps 5%) should be added to Policy 14: Provide a Mix of Housing to meet the demand for self-build. 3. The South-East Lincolnshire Local Plan authorities have an apparent issue with affordability which is not properly addressed in The Local Plan which means that The plan is not meeting The needs of The population and cannot be said to be positively prepared or iustified. The addition of custom- and self-build developments to Policy 16: Rural Exception Sites would help to meet demand for both affordable homes and custom-and self-build plots in the plan area. Such a policy would increase self-build opportunities and by capping the resale of such dwellings at, for example, 60% of market value the policy would increase the supply of affordable homes in

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the plan area. The Local Plan in its current form clearly cannot be considered sound and the above suggestions will help to ensure that the plan is robust when submitted for examination.

<b>ID1:</b>	456	<b>comment_author:</b>	Lincolnshire County Council		
<b>comment_content:</b>	<p>Public health Comments There are good policies around the mix of housing, affordable housing and rural exception sites, etc. However, there is a lack of policy on meeting housing needs in relation to accessibility and space standards. The Housing Minister has said areas should consider the need for bungalows but there is no reference to them in the Plan. This needs consideration. M4 (2) and potentially M4 (3) higher access standards of the Building Regulations should apply to a proportion of dwellings on all developments. Evidence should be provided to demonstrate that the level required is proportionate to future need for accessible dwellings. This should help to enable residents with mobility issues to move within their community where adaptation of their existing accommodation is infeasible. Similarly it would be helpful to understand what work has been undertaken to consider if there is a need for minimum space standards.</p>	<b>Officer Comment:</b>	<p>The housing needs have been assessed in the Strategic Housing Market Assessments and LCC have been involved as consultants in these assessments progressing.</p> <p>No particular evidence is provided by Public Health.</p> <p>The provision of bungalows may be a house type that developers want to provide but the local plan cannot be too prescriptive. Lifetime or homes which can be adapted is sought by Policies in the Plan.</p> <p>The provision of bungalows is particularly challenging in terms of viability and safety in high flood risk areas. Upper floor areas of refuge are a normal mitigation requirement.</p> <p>Seeking higher standards than Building Regulations has been considered but this is difficult to evidence, presents viability considerations and is not generally supported by national policy unless exceptional circumstances can be demonstrated.</p>	<b>Officer Recommendation:</b>	No change to the Local Plan is recommended

**Post\_title:** 5.1 Meeting Objectively Assessed Housing Needs

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

ID1:

457

comment\_author: Mrs E Whettingsteel

comment content:

The draft Plan makes provision for 10,750 new dwellings (net) to be built within South Holland between 2011 and March 2036 at an average rate of 430 dwellings per annum. However, the South Holland Housing Land Supply Report dated 2014 sets a target of 13,950 for the period 2011-2036 with an annual target of 588. Due to a shortfall of 1,285 dwellings from earlier in the plan period, the five-year supply target incorporating the shortfall plus a 20% buffer is 4,890 providing an annual target for the next five years of 978 dwellings per year. There is therefore, considerable disparity between numbers identified in the Local Plan Consultation Draft and South Holland District Council's own Housing Land Supply Report. Given the Council's preferred strategy is one of restrained growth there is a concern that in this area of high demand for new housing, demand will outstrip supply. It is evident that the Council's preferred approach to housing delivery falls significantly short of the identified need for housing within the plan area which could result in a density of development which would have a greater adverse impact on the character of the countryside, than if development was more dispersed and achieved through the planned release of appropriate previously developed sites. The NPPF requires LPAs to boost significantly the supply of housing. It is therefore important the Council increases its housing target to provide a realistic prospect of achieving the planned supply (including its current shortfall) and to ensure choice and competition in the market for housing land. Growth needs to be planned for, over and above the proposed allocations. The proposed strategy is not effective and there is a requirement for further

Officer Comment:

It is considered that the Local Plan is being prepared to meet housing needs of the plan area with considerable scope for flexibility where the opportunities for infill and windfall development might come forward. There are no prescriptive densities of development set by the Plan so sites may accommodate more houses than the SHLAA's have presumed.

There will be differences in figures between the OAN housing need figures, SHLAA supply as being assessed as available (and deliverable) and housing trajectory figures as they are making different assessments for specific purposes in providing evidence that the plan is sound.

Officer Recommendation:

No change to the plan is recommended

contingency and flexibility within the Plan.

ID1:	458	comment_author:	G Greaves		
comment_content:	<p>I support Policies 11 and 12 and the principle behind the allocation of new housing sites within the District but believe that there should be flexibility regarding those allocations in order to meet actual demand for new housing, as appropriate, especially in the Main Service Centres which are capable of accommodating a greater number of dwellings.</p> <p>With particular reference to Cro031 I confirm that there are no ransom strips regarding access and a baseline Flood Risk Assessment undertaken supports residential development on the site.</p>	Officer Comment:	<p>The Objectively Assessed Housing Needs is accepted as being a minimum to be met by the Local Plan.</p> <p>Cro031 - confirmation that no ransom strips exist is noted. The Environment Agency identifies that 'the NPPF (para 101) says that 'The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding' because large areas of the Boston and Spalding are at the same probability of flooding (i.e. land having a 1 in 100 annual probability of river flooding, or a 1 in 200 annual probability of sea (tidal) flooding) the more refined information from the SFRA maps (i.e. the hazard maps) has been used, which show not only the probability of flooding but also the consequences of flooding, to decide which sites are sequentially preferable. The submission of a FRA may satisfy the Exception Test, but you shouldn't move onto apply the Exception Test unless the Sequential Test is passed' – until the updated SFRA is available it is not possible to determine whether the site is one of the more sequentially preferable.</p>	Officer Recommendation:	<p>No change to the Policy with regard to meeting Objectively Assessed Housing Needs is recommended.</p>

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ID1: 459 comment\_author: Aspbury Planning Limited

## comment content:

We support Option A as it is aligned with Paragraph 47 of the Framework s requirement to use an evidence base to ensure that a Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area. The NPPF requires authorities to meet the full objectively assessed housing needs for their areas using the most up to date evidence and so a constraint- led approach based on historical performance will not boost significantly the supply of housing if previous housing completions do not meet all future housing needs established through up to date forecasting. In these circumstances the LPA s should be examining the opportunities available to address constraints to housing delivery going forward rather than looking back to historical performance as a benchmark for the future provision. Paragraph 47 of the NPPF is unequivocal in its message to boost significantly the supply of housing Boston s most up to date assessment of housing requirements published in February 2014 concluded that based on a combination of data from the 2011 and 2008 household projections, ONS migration rates, economic forecasts and affordable housing need that Boston requires 366 dwellings per annum to meet their full objectively assessed housing need. Notwithstanding the above the Draft Local Plan proposes 300 dwellings per year which would appear to be significantly below the objectively assessed need. There is no justification within the Plan for how this lower figure has been derived therefore this figure has no sound basis and would be contrary to the Framework s core aim to significantly boost housing (see response to Policy 2). We support the proposed provision of housing for

## Officer Comment:

The Local Plan has been prepared using 2012 projected households but a review is underway to assess any changes 2014 projections might indicate

## Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

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South Holland as it is in accordance with the full objectively assessed needs calculated for the District within the Peterborough Sub Region- Strategic Housing Market Assessment which was published in October 2015 by GL Hearn.

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<b>ID1:</b>	460	<b>comment_author:</b>	Peterborough City Council
<b>comment_content:</b>	South Holland District Council falls within the Peterborough Sub Regional Strategic Housing Market Area and a joint Strategic Housing Market Assessment (SHMA) was produced with Peterborough, South Kesteven and Rutland. The South Holland element of the South East Lincolnshire Local Plan housing requirement meets the Objectively Assessed Need figure as set out in that SHMA, and Policy LP11 confirms that this will be met entirely within the Local Plan area. We can confirm that Peterborough City Council supports this approach.	<b>Officer Comment:</b>	Support noted. Peterborough are in partnership with SHDC in reviewing the SHMA (OAN)
		<b>Officer Recommendation:</b>	Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

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<b>ID1:</b>	461	<b>comment_author:</b>	Robert Doughty Consultancy Ltd
<b>comment_content:</b>	we support the provision of housing supply that is in accordance with an Objectively Assessed Housing Need. The target of 7,500 dwellings for Boston Borough for the Plan period is appropriate, but will require allocations for new housing sites outside the town in other settlements, such as Sutterton.	<b>Officer Comment:</b>	Comments noted
		<b>Officer Recommendation:</b>	Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

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ID1:

462

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

Policy 11 identifies the needs for permanent accommodation, but has not taken into account the needs of the temporary occupants of the area, who will be drawn to the area for seasonal work in rural businesses. Such seasonal labour is a fundamental requirement of food and farming enterprises, and the employment needs cannot be met by the settled population of the district. This need, whereas not unique to the area, is unusual and is not taken into account in most Strategic Housing Market Assessments. If temporary accommodation is not provided, it will be the case that existing dwellings will be converted to Homes in Multiple Occupation to meet the demands of the seasonal workforce. This will limit the supply of homes to the settled, permanent population, therefore increasing the need for the construction of more houses and reducing the supply of homes. Policy 11 should be amended to state that there is a need for seasonal accommodation over and above the Objective Assessment of Need [\[2\]](#)

Officer Comment:

The SHMA's assess what housing needs arise including single person households (e.g. as provided by HMO's) and family households. Policies are provided to meet these household typologies.

Various means of housing seasonal workers are provided by the hiring agencies and it is uncertain if or how the Local Plan can specifically change or influence such arrangements.

Officer Recommendation:

No change to the Local Plan is recommended

ID1:

463

comment\_author: Hume Planning Consultancy Ltd

comment content:

One consideration when identifying objectively assessed housing need, is ensuring the right level of jobs is sustained by the appropriate level of housing provision. Broadgate are of the opinion that greater flexibility that what is currently proposed should apply to the rural villages for reasons that arise from the findings of the Taylor Review and the need to provide a greater level of affordable housing in the villages. The lifespan of the Plan is such that development may extend beyond 2036. In order therefore to significantly boost the supply of housing during the earlier part of the Plan period, the overall dwelling requirement should be expressed as a minimum. The sites in the settlements below, have all been submitted for consideration in the SHLAA and their merits are set out in those submissions.

- i. Butterwick, Bennington Road - Capacity 19 units over an area of circa 0.75 hectares located to the west of the settlement adjacent to existing development.
- ii. Cowbit, Backgate - A site of 8 dwellings
- iii. Fishtoft, Whitehouse Lane - A site of 19 dwellings
- iv. Freiston, Butterwick Road - A site consisting of 10 dwellings
- v. Gosberton, Quadring Road - Part of this site is brownfield, meeting one of the Core Principles set out in the Framework at paragraph 17. The site is capable of accommodating up to 130 dwellings in a phased development over the Plan period
- vi. Kirton, Skeldyke Road - This site is capable of providing up to 120 dwellings phased over the Plan period. Allocation would realise the opportunity to extend the Graves Park playing field
- vii. Quadring, Casswell Drive - A site of 18 dwellings

Officer Comment:

Butterwick - It is assumed that the site referred to is But020. This site is considered to be one of the more suitable Potential Housing Sites in Butterwick, and should be taken forward as a Preferred Housing Site

Cowbit

The site in Backgate Cowbit is within the settlement boundary. It will not be shown as an allocation owing to it having a capacity of less than 10.

Fishtoft - from the information supplied, it is not possible to identify the site.

Freiston - Decisions on a settlement's place in the Spatial Strategy took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements and their Sustainability Credentials (which looks at local employment opportunities); the settlement's population; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. Whilst Freiston has a relatively broad service base and offers a range of employment opportunities, it is relatively small in scale and does not offer developable land that is at lower flood hazard. Consequently it is considered appropriate that Freiston should continue to be identified as an 'Other Service Centre and Settlement', and that specific housing allocations should not be made. Nonetheless, the Settlement Boundary for Freiston includes much undeveloped land that either has planning permission (B/14/0433 and B/15/0275) or which would be likely to receive planning permission when judged against the emerging Plan's policies

Officer Recommendation:

Butterwick - Site But020 should be taken forward as a Preferred Housing Site.

Cowbit

No change to the approach is required.

Fishtoft - no change to the approach is required.

Freiston - site Fre004 should not be taken forward as a Preferred Housing Site.

Gosberton

Conclusions on site Gos003 – It is considered that site Gos003 is a suitable Potential Housing Site in Gosberton, and should be taken forward as a Preferred Housing Site:  
 • When looking at all the sites in the Sustainability appraisal it is the fifth site of six. However, the site is partly brown field and is in the best flood zone and therefore should be considered as a suitable potential housing site above other site(s).

Kirton

Site Kir012 should not be taken forward as a Preferred Housing Site.

Quadring

It is considered that site Qua004 is a suitable Potential Housing Site in Quadring, and that it should be taken forward as a Preferred Housing Site because:  
 • The site has limited impact on the village and is in flood zone 2.

Weston

viii. Weston, Pinfold Lane - A site of 6 dwellings

ix. Wyberton, London Road - A proposal for 120 dwellings phased over the Plan period.

The total number of dwellings from these sites is circa 450, which represents 2.5% of the overall dwelling requirement of at least 18,250. Through the allocation of these sites, there is scope to further significantly boost the supply of housing, particularly in the early part of the Plan period, in accordance with paragraph 47 of the Framework.

(including site Fre004), to which the objector refers).

## Gosberton

The site is partly brown field and has the best flood risk, being in flood zone 1. All other sites are flood zone 3a. Along with one other site the Sustainability Appraisal scores the site with 2 positive, green, impacts and 3 negative, red, impacts.

## Kirton

It is assumed that the site referred to at Skeldyke Road, Kirton is site Kir012, which was not put forward as a Potential Housing Site, since it was assessed by the SHLAA as undevelopable because it would have adverse environmental impacts, is poorly located, and because dwellings may suffer potential 'bad neighbour' impacts.

## Quadring

The site is quite small and adjacent to Casswell Drive, can be accessed from it and will be seen as part of that development. It is screened on two sides and the open sides are screened at a distance by other development which reduces the impact of the development on the village.

## Weston

1. The capacity of this site at 20dph is 18. Lincolnshire County Highways advised that Pinfold Lane is not suitable to provide an access to this site and any improvement would require land from Wsn003. However, a planning application for 6 dwellings in extensive grounds has been submitted and Pinfold Lane will be improved within its highway limits. This is acceptable to the County Highways Department.
2. The site is between Wsn003 and the existing built up area and fits in with the proposed built form of the

It is considered that site Wsn011 is a suitable Potential Housing Site in Weston owing to its location and its flood risk. However, as it is now proposed to hold less than 10 dwellings it will not be shown as a Preferred Option Housing Allocation. It will be shown within the settlement boundary.

Wyberton - site Wyb010 should not be taken forward as a Preferred Housing Site.

village. It is in flood zone 3a and has one of the better flood risks because it has 'no hazard' for flood hazard or flood depth.

Wyberton - it is assumed that the site referred to is Wyb010. This site is considered to be undevelopable on the basis that: its development would cause adverse environmental impacts (it would extend development into an area with a strongly rural character, to the detriment of that character and it may have adverse impacts on natural assets (the site is an orchard, and the Lincolnshire Biodiversity Action Plan includes a Habitat Action Plan for traditional orchards)); it is poorly located (i.e. It is less accessible to the majority of the town's existing services and facilities than alternative sites); and that the site has some amenity value which would be lost if it were developed.

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ID1:

464

comment\_author: Savills

## comment content:

Housing provision is made for a net increase of at least 18,250 dwellings in South East Lincolnshire, 10,750 dwellings (430 per annum) are proposed in the South Holland Housing Market Area (HMA). In drafting this policy two options were considered: Option a) “ to meet objectively assessed housing needs as set out in the respective Strategic Housing Market Assessments for Boston Borough and South Holland; or Option b) “ to meet housing targets based upon housing completion rates since 1976. We disagree with the above options, and consider that neither option fully encapsulates both authorities housing needs. Option a) fails to take account of local needs whilst Option b) is considered to be unsuitable and takes no account of population growth and future housing need. As set out in the Sustainability Appraisal, Option A was considered the most appropriate and thus taken forward in the Draft Local Plan. South Hollands housing target of 430 dwellings per annum is therefore lifted from the Peterborough Sub-Region SHMA Update (2015). However, whilst the SHMA has considered market signals and affordable housing need as required by the NPPG, no adjustment of this figure has been made to take account of the ability to deliver this level of need in regards to factors such as; past delivery and land supply, development constraints or infrastructure provision, and issues regarding unmet needs from outside of the HMA. South Holland has consistently failed to meet its housing targets. As set out in the South East Lincolnshire Monitoring Report 2013/14, South Holland has met its housing targets only once in 10 years (2007-2008). Furthermore, whilst somewhat out of date, the Housing Trajectory contained in the

## Officer Comment:

The Local Plan will make housing land and development provisions to meet its objectively Assessed Housing Needs. This will be based upon as much reliable evidence as is available and provided by landowners and developers. All such provisions will be assessed by an Inspector at the EIP.

## Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

Report suggests that the Council will not meet its proposed targets (430/annum) until 2017/18. Housing targets in the forthcoming plan period should therefore be adjusted to take account of past under delivery. South Hollands 6 Year Housing Land Supply Assessment as at 31st December 2015, identifies a housing land supply of 3 years. This includes a 20% buffer which in itself is an acknowledgement by the Council that it has consistently failed to meet its housing requirements. Therefore, in addition to increasing overall housing targets that take account of past under-delivery, sites should be capable of being delivered in the next 1-5 years. This is in accordance with the NPPG (ID:3-0352014306) which states local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Additional sites, which are available for delivery in the next 1-5 years, should therefore be identified. Whilst the SHMA has taken into account economic driven projections, the assessment does not take account of local policies or land allocations for economic growth. As noted at paragraph 4.0.4 of the Draft Local Plan, the long term strategy for employment focuses on diversifying the local economy and jobs market, which together with the housing growth agenda will encourage more skilled employees to live and work in the area. In order to help the Council meet its economic aspirations, it is essential sufficient high quality homes are built to attract more skilled employees and ensure young local families stay in the area. There is no evidence that the Local Planning Area has effectively co-operated with neighbouring authorities in regards to meeting their unmet housing need. The Duty-to-Cooperate is an essential component of the NPPF (paragraphs 178-182) and thus further consideration should be given to the housing needs neighbouring HMAs.



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

ID1: 465 comment\_author: Gladman

## comment content:

Introduction This letter is in response to the above consultation and provides Gladman Developments representations to South East Lincolnshire s new Local Plan Issues Paper. Gladman have had the opportunity to become involved in a number of local plan preparation processes since the Framework was brought into force and have gained significant experience as a result. What continues to be clear from this experience is that many local authorities have not fully addressed the requirements of the Framework when preparing their Local Plans and this has led to significant concerns being expressed by Inspectors on the soundness of their plans in their current format. The main concerns centre upon the requirement in the Framework to use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area ( 47). This representation seeks to discuss a number of policy areas which Gladman consider to be important to the development of South East Lincolnshire s New Local Plan. Objectively Assessed Housing Need (OAN) Gladman believe that South East Lincolnshire should plan to meet its full OAN. We note that there are separate Strategic Housing Market Assessments as the two authorities comprising South East Lincolnshire are considered to sit within separate Housing Market Areas (HMAs). Gladman consider that it is vital that there is a consistent methodology across the two SHMAs so that the evidence for housing need across the joint plan area is robust. Evidence will also need to be provided to demonstrate that these two HMAs are indeed reflective of conditions in practice. The process of undertaking an objective assessment is

## Officer Comment:

This contribution exhaustively rehearses the issues an Inspector is likely to examine. Whilst it is the prerogative of any participant in the Local Plan consultation process to maintain an interest and further contribute it is clearly a fundamental function of the consultation process to "evolve" the Plan so that issues can be addressed and agreed in preparation for Examination.

The contributors provide no specific issues to guide how any changes can be considered in order to improve the draft Plan.

## Officer Recommendation:

No change to the Policy is recommended

clearly set out in the Framework principally in 14, 47, 152 and 159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base. The starting point for this assessment is set out in 159 which requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas. The Framework goes on to set out the factors that should be included in a SHMA including identifying 'the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- Meets household and population projections taking account of migration and demographic change;
- Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.

Key points that are worth noting from the above is that the objective assessment should identify the full need for housing before you consider undertaking any process of assessing the ability to deliver this figure. In addition, 159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to

factor in a 3% housing vacancy rate for churn in the housing market, economic factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, offsetting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area. It is our understanding that a majority of the SHMAs that were prepared under the current guidance on SHMA preparation are not Framework compliant and do not consider the full range of factors that are outlined in 159. This is causing significant problems for authorities currently at Examination and therefore, to avoid this issue, SHMAs should be updated to take account of the Framework and ensure plans are based on robust and up-to-date evidence. Indeed, the Government have noted the deficiency in SHMAs and are updating the guidance on SHMA preparation to fully reflect the guidance given in the Framework. Following the exercise to identify the full, objectively assessed need for housing in an area, the local planning authority should then seek to undertake the assessment outlined in 152 of the Framework. This states that Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. This statement clearly sets out that local planning

authorities should seek to deliver the full, objectively assessed need and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate. The final stage of the process is outlined in 14 and involves a planning judgement as to whether, following all of the stages of the process outlined above, any adverse impacts of meeting the objectively assessed needs would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole or specific policies in this Framework indicate development should be restricted. It is also worth noting that the final part of this sentence refers to footnote 9 which sets out the types of policies that the Government consider to be restrictive. These include sites protected under the Birds and Habitat Directive (see 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion . Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints. Assessment of Housing and Economic Development Needs ” Planning Practice Guidance (PPG) As South East Lincolnshire will be aware, the Government issued a guidance note to support local authorities in objectively

assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments as set out in the Framework. Gladman highlight the following key points from this document: - Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, infrastructure or environmental constraints. - Household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need. - Household projection based estimates of housing need may need adjusting to reflect factors affecting local demography and household formation rates which are not captured by past trends, for example historic suppression by under supply and worsening affordability of housing. The assessment will need to reflect the consequences of past under delivery and the extent to which household formation rates have been constrained by supply. - Plan makers need to consider increasing their housing numbers where the supply of working age population is less than projected job growth, to prevent unsustainable commuting patterns and reduced local business resilience. - If the historic rate of development shows that actual supply falls below planned supply, future supply should be increased to reflect the likelihood of under-delivery of a plan. - Plan makers should take account of concealed households. - Housing needs indicated by household projections should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Appropriate comparisons of indicators (land prices, house prices etc.) should be made - with longer

term trends in the HMA, similar demographic and economic areas, and nationally. Divergence under any of these circumstances will require upward adjustment to planned housing numbers. - The more significant the affordability constraints (as reflected in rising prices and rents, and worsening affordability ratio) and the stronger other indicators of high demand (e.g. the differential between land prices), the larger the improvement in affordability needed, and the larger the additional supply response should be. - Market signals are affected by a number of economic factors. Plan makers should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability. The Framework is clear that Local Planning Authorities must consider market signals. It is one of the core planning principles considered in 17. The Framework states: ..Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities. Of critical importance is what the Framework goes on to say in 158 in the section discussing Plan Making. It states here: Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land. The formal publication of the PPG in March 2014 gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which

local planning authorities should go about factoring in relevant market signals in arriving at their objectively assessed need. s 19 and 20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extracts identify some particularly pertinent points. The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand. The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at 17, quoted above, it seems clear that particular consideration should be given to affordability. In order to consider how market signals should be taken forward 20 identifies some key concepts: Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections. It is therefore clear that where market signals are apparent there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully benchmark themselves against other areas. This should not simply be a case of considering

neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are in favour of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing. What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of plans, that many local authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within. The problems are noted in Fixing the Foundations: Creating a more prosperous nation published by HM Treasury in July 2015. In 9.7 the report states: There remains more to do. As the London School of Economics (LSE) Growth Commission found, under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand. Gladman are therefore of the view that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the lifetime of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing

growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis. Gladman note that the uplift suggested for South Holland to take into account market signals was 4 dwellings. Convincing evidence will need to be provided to support this, especially as the uplift seems low when compared to areas such as Eastleigh and Uttlesford (where the respective Inspectors proposed 10% uplifts) and Bath and North East Somerset (where the Inspector recommended an uplift of approximately 30%). To conclude on this point, Gladman believe that South East Lincolnshire, in accordance with 14 of the Framework should meet its full objectively assessed need, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be restricted. Gladman reserve the right to adduce further evidence on OAN at the appropriate time.

ID1:	466	comment_author:	Fishtoft Parish Council
comment_content:		Officer Comment:	Officer Recommendation:
<p>Members of Fishtoft Parish Council have looked at great length at the Local Plan 2011 - 2036 and wish to make comments as follows:- What research has been done with regard to who will occupy the proposed properties; where are the survey results; who completed the surveys and when were they done? Where is the proof that such a large amount of additional housing is needed</p>		<p>The Local Plan text makes reference to the supporting evidence and where it can be found.</p>	<p>No change to the Policy is recommended</p>

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

ID1: 467 comment\_author: Chestnut Homes

comment content:

We agree with the proposed approach to adopt option A to meet the objectively assessed housing needs resulting from the strategic housing market assessments and also support the separation of the two local authority areas between Boston Borough and South Holland. The key policy driver within the NPPF of retaining a 5 year housing supply will, in our opinion, be better dealt with in relation to these separate areas rather than being considered jointly. In relation to the housing trajectories referred to in paragraph 5.1.8, as one of the major housing developers in the area we will be keen to discuss this in further detail with the local planning authority in the run up to the publication draft Local Plan. It will also be important to ensure an up to date housing needs figure is adopted and this will no doubt be interrogated in more detail as the Local Plan progresses towards enquiry.

Officer Comment:

Comments noted

Officer Recommendation:

No change to the Local Plan is recommended

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ID1: 468 comment\_author: Vale Planning Consultants

comment content:

This Policy sets out the required housing provision for each Local Authority area, with South Holland being required to deliver 10,750 no. New dwellings across the plan period, which equates to 430 no. Dwellings per annum. This level of provision is supported, in order to ensure the delivery of a range of housing options to support the sustainable growth of settlements across the District.

Officer Comment:

Comments noted

Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

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

ID1:

469

comment\_author:

Woods Hardwick Planning Ltd

comment content:

The plan presents two options for meeting housing need. The first is to meet objectively assessed need as set out within the respective Strategic Housing Market Assessments and the second option is to meet housing targets based upon housing completion rates since 1976. The second option does not comply with the requirements of the National Planning Policy Framework which requires local planning authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed need for market and affordable housing in the housing market area. This option should therefore not be considered. We support the option of basing housing need on an up-to-date assessment. The supporting evidence includes an update to the Peterborough Sub-Regional Strategic Housing Market Assessment in October 2015, which took account of the new national household projections that were published in February 2015. This is considered to constitute an assessment based on the most up-to-date assessment evidence. However, in respect of South Holland it should be recognised that the previous SHMA set an annual figure of 560 dpa. The difference obviously reflects fluctuations over time and consideration should be given to increasing the current figure of 430dpa to reflect this as future need could swing back towards the higher figure.

Officer Comment:

Comments noted

Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

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

ID1: 470 comment\_author: Mark Bassett

## comment content:

Policy 11: Meeting Objectively Assessed Housing Needs  
Policy 11 sets out the Objectively Assessed Housing Need (OAHN) for Boston Borough over the plan period (2011-2036) as 7500 dwellings (300 dwellings per annum). It is considered that this figure is too low and has been suppressed by a number assumptions relating to population projection, economic forecasts and the requirement for affordable housing. Demographic Pro'ections The evidence within the latest Strategic Housing Market Assessment (2015) demonstrates that population growth within Boston over the period 2001-2013 rose 18.1%, with a high proportion of international migration. This level of population growth is significantly higher when compared to Lincolnshire (11.9%), East Midlands (9.8%) and England (8.9%). Figure 2.5 of the SHMA also demonstrates that projected population growth in Boston for the period 2011-2036 will increase at a faster rate (20.8%) than county, regional or national levels. The future projected levels of migration are below past trends yet it is clear that international migration has been a significant factor in net migration, with a ten year increase from 1,727 to 9,790 (467%) for non UK population. The evidence for this is unclear and an under estimate for future levels of migration would call into question the effectiveness of the OAHN figure. A second area which requires further analysis is age structure of the population Boston and how this is projected to change. Specifically for the period between 2001 and 2013, the over 75 category saw an 19.6% increase in population. This was only the third highest increase with the age category 15-29 at 31.1% and 60-74 at 25%. In comparison figure 2.8 looks at projected population

## Officer Comment:

Comments noted

## Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

change 2011 to 2036 within the same fifteen year age bands and reports that the over 75 category is projected to increase by 81%. All other age ranges vary between an 8-17% increase. Whilst a more elderly population is of course in line with the national trend, this figure seems exceptionally high and somewhat of an anomaly. The impact that a revised distribution of population growth through the age categories would have is unclear, but the matter requires further explanation to ensure that the current assumptions are not suppressing OAHN. Economic Pro'ections The forecast for the increase in employment for the plan period is approximately 3,800, with the increase projected from 34,150 in 2011 to 37,196 in 2031, extending a further five years to 2036. This forecast appears unreasonably pessimistic in the context that figure 3.2 shows following the recession in 2008, significant job increases were experienced for the period of 2009-2011, before a slowing in growth to 2013. The graph at figure 3.2 shows growth of approx 2,500 for the period between 2009 and 2011 alone. It is submitted that greater justification is required for the growth in jobs of 3,800 over the plan period. It is noted that the figure derived for OAHN, could in theory accommodate job growth approaching double the figure provided, but nevertheless the correct approach required by the NPPF and PPG is to make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate. The evidence within the SHMA on job growth only appears to relate back to 1997 and therefore a considerably shorter length of time than the plan period. Affordable Housing The need for affordable housing in the SHMA is calculated at 250 dwellings per annum but adjustments are made for a proportion of supply being provided by the private

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

rented sector (PRS). The SHMA recognises that the methodology adopted in providing an assumption for need met by PRS is arbitrary (para 4.77) but seeks to justify that approximately two thirds of affordable housing will be provided by PRS. This results in a figure of approx 100 dwellings per annum as the target for affordable housing but this figure is not sufficiently justified to give any appropriate weight and therefore this affordable housing figure may unreasonably suppress OAHN.

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<b>ID1:</b>	471	<b>comment_author:</b>	Chris Atkinson
<b>comment_content:</b>	Policy 11 - Meeting Objectively Assessed Housing Needs Our Client is encouraged to note that the Council are proposing to provide at least 18,250 dwellings, which is split between 7,500 (300 per annum) in Boston Borough and 10,750 (430 per annum) in South Holland. This is an increase on previous housing targets set out in the Lincolnshire Structure Plan and the East Midlands Regional Plan and aims to meet the increased housing demand in the two areas. Notwithstanding the above, our Client reserves the right to make further comments at a later stage regarding the specific housing target.	<b>Officer Comment:</b>	Comments noted
		<b>Officer Recommendation:</b>	Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

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

ID1: 472 comment\_author: Lincolnshire County Council

## comment content:

Strategic Planning Comments The overall scale of housing growth proposed is supported by evidence in two up-to-date SHMAs, on which LCC were consulted. The evidence and justification for this d s, however, need to be more fully and clearly presented, both in the Local Plan itself and supporting documents to stand up to challenge at the Examination stage. 1. There is no explanation in the Local Plan of why Government policies expect that objectively assessed housing needs should normally be met in full (NPPF paras. 14 and 47) or that it is still for Local Authorities to decide whether to propose a housing target that is higher or lower, provided it is clearly justified. This leaves the impression that they are "given" figures, like the old Regional Plan targets. Policy 11 itself is extremely brief. It d s not even state the Local Plan period. 2. The alternative Option B for Sustainability Appraisal purposes of basing targets on completion rates since 1976 is not a radical alternative, especially in South Holland where the annual rates are only slightly below the OAN (408 in 1976-2013 compared to the OAN of 430). Both SHMA contained a number of alternative scenarios, some of which could have been used for SA purposes, if only to demonstrate why they are less sustainable. LCC is happy to advise on reasonable alternatives for a revised Sustainability Appraisal. 3. It not correct to state that "Both HMAs have a higher housing need to be met than |. either through the Lincolnshire Structure Plan or East Midlands Regional Plan". The South Holland annual rate of OAN is significantly lower than the Regional Plan target of 540 p.a. The total provision is higher only because the Local Plan is for 25 years, compared to just 10 in the Regional

## Officer Comment:

Comments noted.

LCC are a partner in producing the detail and contents of the Local Plan and background evidence.

## Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

Plan. 4. The draft Local Plan relies heavily on the Spatial Strategy Background Paper for further detail, including of Government policies, but the references in that document to the SHMAs need to be updated. They do not currently refer to either SHMA as finally published, which they now have been, even though the final versions are in the Evidence Base on the South East Lincolnshire Local Plan website. a. The Boston SHMA (July 2015) is fairly summarised, but the key paragraph 5.15 should state the final published OAN of 302 p.a. (rounded down to 300 in Policy 11). b. It summarises the original Peterborough SHMA (July 2014), with just one paragraph added on the Peterborough SHMA Update (Oct. 2015). This does not set out the rationale for a reduction in the OAN for South Holland from a range of 560-600 p.a. to just 430 p.a., even though this figure is used in Policy 11. Currently the only published basis for that decision is Note 2 in Appendix A to the report on the draft Local Plan to the Joint Strategic Planning Committee on 11th Sept. 2015, and the Minutes of that meeting. Taken together the draft Local Plan and the Spatial Strategy Background Paper provide inadequate evidence to support the proposed housing provision in South Holland in particular. They need to be more precisely drafted and updated to reflect the evidence that does exist.

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

ID1: 473 comment\_author: Barton Willmore

## comment content:

The South East Lincolnshire Plan Area consists of two Housing Market Areas (HMA), namely Boston Borough and the Peterborough Sub-Region and this includes South Holland for the plan period from 2011-2036. Boston Borough conducted a Strategic Housing Market Assessment (SHMA) in July 2015 and concluded that the Objectively Assessed Need (OAN) for housing is 302 homes per annum (7,550 total for the plan period). Peterborough Sub-Region also conducted a SHMA in October 2015 and concluded that the OAN is 430 dwellings per annum (10,750 for the plan period). Both SHMA figures conclude a total of 18,300 dwellings required throughout the plan period to meet the OAN. Policy 11: Meeting Objectively Assessed Housing Needs (Paragraph 5.1.4) of the draft Local Plan states that provision will be made for a net increase of at least 18,250 dwellings for South East Lincolnshire with South Holland accommodating 10,750 and Boston Borough accommodating 7,500. The total figure is 50 dwellings less than the two SHMA figures and therefore not considered to meeting the full OAN. The Council do consider it necessary to objectively assess housing need within the District and propose to act in accordance with meeting the Strategic Housing Market Assessments outcomes. However, the proposed housing provision is less than the combined SHMA figures. We object to this proposed figure and would recommend that the Local Plan figures are adjusted to meet the full OAN of the two SHMA figures.

## Officer Comment:

Comments noted. The shortfall of 50 for BBC is due to a "rounding down" by 2 per annum of the indicative annual build rate. The figures will not be represented this way in the Publication draft.

## Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

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

ID1: 474 comment\_author: iba planning

comment content:

Whilst Policy 11 (Meeting Objectively Assessed Housing Needs) confirms that provision will be made for a net increase of at least 18,250 dwellings in South-East Lincolnshire, the local authority split is given as a fixed, rather than minimum, requirement. Given that the objectively assessed housing need is a minimum one, it is suggested that the housing splits for the two local planning authorities and individual settlements are similarly identified as a minimum requirement in the interests of consistency and for the avoidance of any doubt. To remedy the above objection at this stage: - the housing splits for the Local Planning Authorities and individual settlements should be identified as a minimum requirement in the interests of consistency and for the avoidance of any doubt. In the absence of the above amendments, my client's objection to the draft Plan will remain.

Officer Comment:

Comments noted. In stating "at least" it is clearly an acceptance that the figures are minimum figures. The Local Plan has many flexibilities in the assessment and provision of sites; no fixed density policy, windfalls are excluded as are infill opportunities throughout all the settlements. The rural exceptions policy may also bring forward other sites.

Officer Recommendation:

No change to the approach is recommended.

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ID1: 475 comment\_author: Larkfleet Homes

comment content:

Generally we support the increase in the housing requirement from 696 dwellings per annum proposed in the Preferred Options consultation to 730 dwellings per annum in the Draft Plan. However, for various reasons as highlighted in the response from the HBF, this increase is too modest and the housing requirement should be higher.

Officer Comment:

Comments noted. No evidence is provided by the Objector.

Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

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

ID1: 476 comment\_author: Mike Harrison

## comment content:

There has been an increase in low skilled economic migrants for planting and harvesting vegetable crops. The number of people required to work on farms permanently has fallen dramatically. Many owners are not now from a historical background . The area is similar to many, many other agricultural zones in the world. Characterised by low populations, scattered communities and opportunities for young people low. These are not deprived but have been stable for generations. So shipping in people and building houses in high quality food growing areas does not make any sense whatsoever. Reducing the food output in favour of houses that is already taking place along with SHDC zoning double cropping arable land around Holbeach and elsewhere is the wrong decision. As with many proposals with the plan no foresighted thinking has been applied. Much vision but more suitable areas are available in the UK ; Other families such as the retired and those looking for cheaper housing also now populate the area. Many have little understanding of agriculture or food production. Many commute to other large towns and cities. Will providing lots of houses help the area or people? No, it will create more car traffic on roads not designed to carry large numbers of vehicles. Locally pubs are closing, shops are shutting down, markets are much reduced in variety and size. Bus routes are much reduced and under threat from Government cuts. Most people have cars. As an agricultural production area few people are required. The odd abattoir and a few vegetable processing plants fit quite easily. The need to locally process crops is very low. Potatoes go to March/Corby/Easton. Peas to Kings Lynn. Vegetables to the Boston area. The area is not

## Officer Comment:

Comments noted. The Objector provides a range of opinions but no evidence to counter the Objectively Assessed Housing Needs or the policies and proposals of the Plan

## Officer Recommendation:

No change in the approach of the Local Plan is recommended.

deprived, it is balanced against the needs of an organically changing population. Economic migrants are adding to the diversity but it takes time for many to speak English or integrate. most are very hard workers. So trying to turn the area into a higher population area compared to many food production areas in the world would seem the wrong decision. The overall idea that a low population, sustainable food growing area (that is stable), that is more than likely to flood, needs to have more houses, people, cars, pollution, d s not appear to be the most sensible approach to local planning.

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

ID1: 477 comment\_author: Waller Planning

comment content:

The Proposed Housing Target The proposed housing target for South Holland, of 430 dwellings per annum (dpa) is unrealistically low. It is very low when compared with previous projections, which have consistently indicated a basic requirement for around 560 to 600 dpa. Despite this, it has been accepted as an acceptable target, without sense checking or any realistic adjustments to ensure that it delivers sustainable development for the future. As drafted, it is unsound and it would be open to challenge at Examination. The essential reason for the significant downturn in the housing target is because it is based on an assumption that a 5-year trend, which represents an almost entirely recessionary period, will be continued over the next 20 years. We understand that the proposed housing target relates to the 2012-based ONS Household Projections. These projections are themselves based on trends seen in the period 2007-2012, and 2006-12 for international migration. Within this period, net internal migration reduced markedly, halving from 736 people in 2007 to 318 people in 2008. In addition, international migration halved from 956 people in 2008 to 476 people in 2010. In both cases, these trends have started to reverse, with large increases in inwards migration in 2012/13 and then more markedly in 2013/14. However, the trend of recovery is not captured by the projections on which the housing target is based, as they are outside of the range to which it relates. The period 2007-2012 was largely a period of recession. It is not representative of the average level of development in South Holland District over a longer 10 or 15 year period. Comparing the net change in the total number of people migrating

Officer Comment:

Comments noted

Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

to the District year on year, it is particularly striking to note that in the final pre-recession year of 2007/08, this was 1,451 people, but that it dropped to a low of only 128 people in 2011/12. It then rose again, to 725 people and then 1,176 people in 2012/13 and 2013/14 respectively, years which are not within the period on which the housing target is based. However, despite the very clear evidence that the household and population projections are based almost exclusively on a period of recession, the Strategic Housing Market Assessment Update Report (SHMA 2015) makes no upward adjustment to the base housing target. Such an adjustment would be a logical response to a trend which is so clearly skewed by a well known phenomenon, and which has clearly led to some very unrepresentative data. The effect of this approach is to base the housing target for the next 20 years on an assumption that there will be a continuation of trends which are representative of the worst years of the recession. This approach is entirely unrealistic, and it will have the effect of artificially constraining housing growth. Table 13 of the SHMA 2015 shows that a trend based on a 10-year period would imply a far higher level of housing need. The 2012-based Sub-National Population Projections projection, which is the one favoured by the SHMA 2015, imply a population growth in South Holland District of 21.8%. If this projection is moved on to a 2014 base date, it is based even more on the worst years of the recession, and the population increase reduces to 17.4%. However, the 10-year migration (variable) trend, which is based on a 10-year period covering both the recession and the period before it, indicates population growth of 25.9%. It can therefore be seen that by using a period which is more representative of the full economic cycle a higher level of population change, and therefore a higher housing

target, can be expected. The SHMA 2015 fails to consider in any robust way whether the base data for its housing target is appropriate, or whether there may be good reasons for using data based on a longer period. It also fails to consider the evidence of the two most recent years of monitoring data, which indicate a rapid return is underway to pre-recession levels of migration. These are significant issues, which must be addressed before the Local Plan progresses. A failure to do so would cast significant doubt on the likelihood of the Plan being found sound at examination. Affordable Housing Policy 15 of the draft Local Plan explains that there is an identified need for 210 affordable homes each year in South Holland. Table 42 of the SHMA 2015 actually estimates a higher net level of affordable housing need within South Holland, at 284 dwellings per annum. The level of affordable housing need is at best around half of the proposed housing target for the District. It is therefore clear that such a high need for affordable housing cannot be met within the scope of the policies in the Local Plan. Whilst this is not an unusual situation, the high level of need for affordable housing is a legitimate reason for increasing the housing target, irrespective of the base data that is used. This is recognised in the SHMA 2015, at paragraph 4.87. However, the SHMA 2015 does not include any notable increase in response to the need for affordable housing. We have noted in relation to Policy 15 that the proposed level of 30% affordable housing in residential developments in South Holland District, is unlikely to be viable in all cases. Given this, there is an even greater need to increase the overall level of housing proposed, in order to help make a suitable contribution towards meeting the need for affordable housing. National Policy and Guidance The NPPG recognises that projections should form the

starting point 2 for Local Planning Authorities, when looking to define housing need. The level of housing which the projections indicate is therefore a minimum threshold for future development. However, they are only a starting point because they are simply a continuation of past trends, based in a relatively short 5 year period. The NPPG notes the following in this regard: The household projections are trend based, i.e. They provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.

3 It is therefore relevant to consider changing economic circumstances, when assessing whether these trend-based figures represent a suitable housing target. When considering how changing trends over time should be factored in to a housing needs assessment, the NPPG offers the following advice: Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections. Volatility in some indicators requires care to be taken: in these cases rolling average comparisons may be helpful to identify persistent changes and trends.

4 This approach is consistent with the fundamental aim expressed at paragraph 47 of the NPPF, that local planning authorities should boost significantly the supply of housing. The NPPF does not support any approach which would artificially constrain

housing through a negative assumption, that a recessionary trend will continue in the long term. This approach is fundamentally unsound, as it fails to meet the NPPF's requirement for Local Plans to be positively prepared, in addition to meeting the need for development, on the basis of a robust evidence base.

The Economic and Social Implications of an Under-Supply in Housing The NPPG is clear that the needs of businesses must be considered when determining a suitable housing target. A failure to meet housing need over the long-term will inevitably lead to an acceleration in the increase of house prices, as demand outstrips supply. Where housing is unaffordable, it will be increasingly difficult for workers on lower incomes to find suitable housing close to their place of employment. These workers will not typically commute long distances to work, and so this can lead to a shortage of suitable workers in the area. This trend can have a particularly strong effect on the local economy in an area like South-East Lincolnshire, where there are a high proportion of workers on relatively low salaries. The NPPF recognises at paragraph 21 that a lack of housing can be a barrier to investment and economic growth. Paragraph 17 also notes the link between housing and economic growth. The social consequences of limiting house building, leading to worsening affordability, will be that the local population will become even less diverse, and increasingly polarised between the haves and have-nots. A failure to meet housing need implies that the Local Plan will not deliver a sustainable future for South-East Lincolnshire. As such, it would be unsound, due to not being positively prepared, justified or effective. Proposed Change The housing target for South Holland should be reviewed, and a new target derived which is based on long-term migration trends, incorporating the complete economic

cycle. It should also be uplifted as may be necessary in order to meet the needs for specialist types of housing, including affordable housing. The proposed housing target should also be stated as a minimum requirement, to ensure that where there is the potential to meet a higher level of housing need, this can be achieved.

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<b>ID1:</b>	478	<b>comment_author:</b>	Steven Ball
<b>comment_content:</b>	I believe that there is not a shortage of houses in England, just too many people, but that's a different issue.	<b>Officer Comment:</b>	Comments noted
		<b>Officer Recommendation:</b>	No change to the Local Plan is recommended

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**Post\_title:** 5.10 Conversion of Redundant Rural Buildings to Residential Use

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

ID1: 819 comment\_author: Jacqui Woods

comment\_content:

5.10. Do not try to tidy-up the county too much, it has an absolute and unique charm and this must be retained.

Officer Comment:

Noted.

Officer Recommendation:

No change required.

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ID1: 820 comment\_author: Aspbury Planning Limited

comment\_content:

We support this policy as enables redundant buildings to be brought back in to use and assists in the supply of housing to meet the full objectively assessed needs of South Holland and Boston.

Officer Comment:

Noted.

Officer Recommendation:

No change required.

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ID1:

821

comment\_author:

Country Landowners Association

comment content:

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 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.

Officer Comment:

The policy does not make reference to highways impacts and therefore does not specifically seek to restrict the conversion of redundant rural buildings in situations where there are problems with rural modes of transport.

Officer Recommendation:

No change required.

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

ID1: 822 comment\_author: Surfleet Parish Council

comment\_content:

We support the details of the conversion of the redundant rural buildings to residential use. This will allow development to provide for the number of dwellings potentially required, without destroying the countryside, in fact enhancing it by providing good quality residential buildings.

Officer Comment:

Noted.

Officer Recommendation:

No change required.

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ID1: 823 comment\_author: Natural England

comment\_content:

We welcome paragraph 5.10.10 which highlights the requirement for ecological surveys under the Wildlife and Countryside Act 1981.

Officer Comment:

Noted.

Officer Recommendation:

No change required.

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

ID1: 824 comment\_author: Mr & Mrs Rylott

comment content:

Policy 20 page 57 Conversion of redundant Rural buildings to residential use. The wording of the policy should allow for significant repair works to be undertaken in order for conversion - the words "without the need for significant extension, alteration or rebuilding" should be redrafted to state: "without the need for significant extension, whilst any necessary alteration, repair or rebuilding should maintain the original character of the building in terms of its scale, colour and use of materials". This would allow for the fact that any conversion would automatically entail 'significant alteration'. What matters is the character and external appearance of the end result , that it remains 'in keeping with its surroundings.'

Officer Comment:

If significant repair works or alterations are required the building probably is not a suitable candidate for conversion. It is considered that the words "significant rebuilding" need to be included in the policy since if this is necessary the development entailed clearly would not be a conversion. This policy would therefore no longer apply. It would be treated as a new building in the countryside and paragraph 55 of the NPPF seeks to avoid new isolated dwellings in the countryside unless there are special circumstances.

Officer Recommendation:

No change required.

ID1: 825 comment\_author: RSPB

comment content:

The RSPB recommend that policy 20 references the Habitat Regulations 2010 in addition to the Wildlife and Countryside Act 1981, as all UK bat species are protected as under Annex IV of the Habitats Directive. In addition, we recommend barn owls are referred to specifically within policy 20 as a schedule 1 species under the Wildlife and Countryside Act 1981.

Officer Comment:

Other policies of the Plan would require compliance with the Habitat Regulations 2010. It is unnecessary to repeat specifically for this Policy when such policy requirements are, conceivably relevant to all existing buildings and pieces of land. Barn owls are covered by reference to the Wildlife and Countryside Act 1981.

Officer Recommendation:

No change required.

ID1:

826

comment\_author: Studio 11 Architecture Ltd

comment content:

Generally we would support this policy as it can both help to protect attractive buildings which are worthy of retention, by giving them a viable use and also help to meet the need for housing in rural areas. More flexibility in paragraph is required though in paragraph 5.10.7 to allow for the retention of quality post war barns that are not built of brick but are no longer of use due to the size of modern machinery.

Officer Comment:

Paragraph 5.10.7 does not restrict the policy purely to brick built barns. However, criterion 3 of the policy means that a building should be of architectural or historic merit or one that makes a positive contribution to the character of the landscape. This is so as to protect against the conversion of poor quality buildings that make no contribution to the character of the landscape.

Officer Recommendation:

No change required.

ID1: 827 comment\_author: Lincolnshire Wildlife Trust

comment content:

Whilst we welcome the mention within this policy of the requirement for ecological surveys, the wording used is inaccurate. This should be amended to read An ecological survey will be required where species protected by law, or priority species listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 have the potential to be present. 5.10.10: We support the inclusion of this paragraph which highlights the value of rural buildings to protected species such as bats and barn owls. However the text should be amended to make it factually correct. Bats are protected under the Wildlife and Countryside Act 1981 (as amended), however they are also European protected species and covered by legislation in the Conservation of Habitats and Species Regulations 2010 which provides additional protection over and above that within the Wildlife and Countryside Act. Rather than a survey being required only when such species are known to be present, surveys should be carried out in all cases where there is a reasonable potential for the species to occur; this is an important distinction which should be made in the text.

Officer Comment:

Noted.

Officer Recommendation:

Changes made to reflect comments.

ID1:

828

comment\_author:

Greater Lincolnshire Nature Partn

comment content:

Object The GLNP object to this policy as it is not the primary objective of an ecological survey to be carried out when protected species are present but rather to determine if they are present. Furthermore restricting the requirement for a survey to only Wildlife and Countryside protected species excludes other legally protected species plus other species for which the Joint Committee has policy obligations. As such the GLNP recommends rewording this section to: An ecological survey will be required where it is likely that legally protected or priority species are present ☒

Officer Comment:

Noted.

Officer Recommendation:

Changes made to reflect comments.

ID1:

829

comment\_author: Waller Planning

comment content:

We support Policy 20, as it can both help to protect attractive buildings which are worthy of retention, by giving them a viable use, and also help to meet the need for housing in rural areas. This policy is also consistent with the Government's approach to boosting housing in rural areas, and making efficient use of existing buildings. It is an environmentally sustainable approach to development, due to the potential to re-use existing buildings, with their embodied carbon and energy. It is also socially sustainable, as it can help people to stay within rural communities, rather than having to move away from family and friends to find suitable housing. We do not believe that it is necessary for Policy 20 to be limited to buildings which are of architectural or historic merit, or make a positive contribution to the character of the landscape. This limitation means that many other buildings, which may be suitable for conversion, would not be covered by the policy. This would mean that opportunities would be missed for sustainable forms of development, and to provide housing to meet local needs. We suggest that the policy should be made broader, with the inclusion of additional criteria in this regard. The reference within the Policy to ecological surveys is unnecessary, given that this matter is covered more adequately by other policies. If the Councils consider it is necessary to highlight the issue that rural buildings may be habitats for protected species, this could be addressed within the supporting text alone. We also note that it is not clear why paragraph 5.10.9 of the supporting text is necessary. A restrictive condition should not be imposed on a replacement dwelling without there being a need for it; this principle is set out at paragraph

Officer Comment:

The purpose of the policy is to protect and retain rural buildings with traditional character that are of architectural merit and benefit the rural landscape. Making the policy broader as suggested would result in proposals for the conversion of poor quality buildings that make no contribution to the character of the landscape. Point noted regarding ecological surveys. Comment noted in relation to occupancy restriction. It is not considered that the proposed amended wording is necessary - if the building to be reused is of substantial construction, then it will be a more sustainable form of development because it is likely that less energy will be consumed by converting it than would be used in constructing a newbuild. Development through this policy would also undoubtedly contribute towards meeting the Objectively Assessed Housing Need for the area. It is unnecessary to expressly state this.

Officer Recommendation:

Reference to ecological surveys should be included in the policy's supporting text instead. Reference to the possibility of a planning condition/legal agreement being required should be deleted to reflect the position in the National Planning Policy Framework

204 of the NPPF. Such a condition is only required where a new build house is proposed on previously undeveloped land, as envisaged by Policy 21. We therefore suggest that paragraph 5.10.9 should be deleted. We propose the following amended wording for Policy 20 (deleted text struck through, new text is in bold): Proposals for the conversion of existing buildings which are located outside settlement boundaries to residential use will be permitted provided that: 1. the building is structurally sound and capable of conversion without the need for significant extension, alteration or rebuilding; and 2. the building is of architectural or historic merit or makes a positive contribution to the character of the landscape, to justify conversion to ensure retention; and 2. the proposal is in keeping with its surroundings; and 3. the design is sympathetic to the character and appearance of the building in terms of architectural detailing and materials of construction; and 4. development leads to an enhancement of the immediate setting of the building. In addition, the building should meet at least one of the following criteria: 1. the building is of architectural or historic merit or makes a positive contribution to the character of the landscape; or 2. the building is of substantial construction, and its re-use would be a sustainable form of development due to the retention of embodied energy and carbon; 3. the proposed conversion would meet an identified need for local housing. An ecological survey will be required where species protected under the Wildlife and Countryside Act 1981 are present. Permitted Development Rights may be removed in order to control future alterations or extensions that may impact upon the landscape and rural character of the area.

Post\_title: **5.11 Agricultural, Forestry and other Rural Workers Dwellings**

ID1:

830

comment\_author:

Country Landowners Association

comment content:

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 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. We generally consider Policy 21 on rural dwellings to be clearly drafted and sensible in its contents however we would ask for the removal of the phrase other existing accommodation in the area as the reason for applying for a rural worker's dwelling to offer emergency care out of hours necessitates a worker living on site; a need that could not be met by accommodation in the local

Officer Comment:

The policy only seeks to ensure that an appropriate level of safety and access to the highway can be achieved and therefore does not specifically seek to restrict the conversion of redundant rural buildings in situations where there are problems with rural modes of transport. Development management officers have indicated that the spatial term "area" has been used without problem in the South Holland Local Plan since its adoption in 2006. "Immediate locality" suggests that the "other existing accommodation" that is capable of meeting the functional need would need to be next door which would result in the criterion being extremely narrow.

Officer Recommendation:

No change required.

area. If this clause must be left in then we would request that the wording is amended to read immediate locality

<b>ID1:</b>	831	<b>comment_author:</b>	Lincolnshire Wildlife Trust
<b>comment_content:</b>	The Lincolnshire Wildlife trust would recommend that this policy is amended to include reference to potential impacts on biodiversity. For instance, we would suggest an extra bullet point under the first paragraph to read: 6. the proposed dwelling will not adversely affect areas of importance to nature conservation.		
<b>Officer Comment:</b>	It is considered that this is covered by Policy 25.		
<b>Officer Recommendation:</b>	No change required.		

## **Post\_title:** 5.2 Distribution of New Housing

<b>ID1:</b>	479	<b>comment_author:</b>	Status Design
<b>comment_content:</b>	have re submitted Lut015. This is an implied objection to the position of the settlement boundary for Lutton, which excludes the site, and the position of Lutton in the Settlement hierarchy and the consequent approach for development in Lutton.		
<b>Officer Comment:</b>	Lutton is a small settlement with a low sustainability of settlement assessment score. It is considered that it is logical that Lutton remains a designated Other Service Centre and Settlement. It is comparable with the other settlements in this category.  A number of other SHLAA sites have also been put forward for Lutton, many of which are adjoining the proposed settlement boundary. Lut015 is seperated from the settlement boundary.		
<b>Officer Recommendation:</b>	No change to the Policy is recommended		

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

ID1: 480 comment\_author: G R Merchant

comment content:

have resubmitted Wsn019 for consideration. This is an implied objection to the position of the settlement boundary for Weston Hills St Johns, which excludes much of the site, and the position of Weston Hills St Johns in the Settlement Hierarchy and the consequent approach for development in Weston Hills St Johns

Officer Comment:

Weston Hills St Johns is a small settlement within the proposed Other Service Centre and Settlement category. It is the strategy of the Plan to meet the objectively assessed housing needs within more sustainable and accessible settlements rather than distribute the housing need throughout all settlements or where SHLAA sites have been submitted.

The Objector's site was part of a housing allocation put forward in the South Holland District Local Plan of 1998 but has not come forward for development.

The Rural Exception Sites policy would allow a specific housing need to be met in the settlement where community, economic and environmental benefits would be realised.

Officer Recommendation:

No change to the Policy is recommended

ID1: 481 comment\_author: David Connolly

comment content:

has submitted two sites at Tongue End for consideration. One is to the south west of Masters House and wraps around 1,2,3,&4 Norton Cottages. The second is to the north and wraps around a dwelling and abuts 1 Counter Fen Drove. This is an implied objection to the position of the settlement boundary for Tongue End, which excludes the sites, and the position of Tongue End in the Settlement Hierarchy and the consequent approach for development in Tongue End.

Officer Comment:

Tongue End is a remote and scattered linear settlement of a small number of houses. It has one of the lowest sustainability of settlement scores in the whole plan area.

The objectors sites would intensify the linear extension. It is not considered to be consistent with the approach of the plan to redefine the settlement boundary of Tongues End either in relation to the character and form of the settlement or to justify the settlement's re-categorisation as a Minor Service Centre.

Officer Recommendation:

No change to the Policy is recommended

ID1: 482 comment\_author: Adam Murfit

comment content:

Submits land for consideration, which fronts Six House Bank and is opposite Rural Avenue. This is an implied objection to the position of the settlement boundary for Northgate & West Pinchbeck, which excludes the site, and the position of Northgate & West Pinchbeck in the settlement hierarchy and the consequent approach for development in Northgate & west Pinchbeck.

Officer Comment:

Northgate and Pinchbeck is a long linear settlement with a low sustainability of settlement assessment score. It is considered that the settlement is comparable with Other Service Centres and Settlements in the category.

The objectors site is part of a large site extending to some 5 hectares. As purely a frontage site the inclusion within the settlement boundary would simply elongate the linear form of the settlement and set a precedent for other similar linear extensions.

It is not considered to be consistent with the general approach for determining settlement boundaries to include the objectors site nor is it considered that there is any evidence provided to re-categorize Northgate and West Pinchbeck as a Minor Service Centre.

Officer Recommendation:

No change to the Policy is recommended

ID1: 483 comment\_author: Jacqui Woods

comment content:

Comments in relation to Pinchbeck: This is a comprehensive, far reaching and important plan that will potentially change some areas of South Holland for good. I appreciate that this is an area that requires new housing and new transport links as there is a massive agricultural employment structure that needs maintaining " it is probably the major employer in the area. Pinchbeck is in a unique position as it is both rural and urban with a large industrial estate on the outskirts which provides 30% at least of the transport to the UK and beyond. However I do think that this unique position needs to be considered and maintained by the plan developers. Although it is a large village, it is still a village. It is not a town and I don t believe that the inhabitants want it to be a town or to receive town status so why has it been promoted to be a Main Service centre? What will this promotion mean in the future? Also, the rural aspect needs to be at the fore of some of the considerations " Spalding is a charming market town and this should be retained as far as possible but Pinchbeck is not to be made a suburb of Spalding by the encroachment of housing built on land between the two areas. It is a separate village. I like living next to Spalding. I like living in a village next to Spalding. There needs to be a major green area between the two areas to retain the feel and separateness of Pinchbeck as a village. This, I feel, is vital. There is a great community spirit in Pinchbeck which largely relies on the fact that it is a village and this is in danger if the plan does not implement a large area of green space to keep it separate.

Officer Comment:

Pinchbeck, as a settlement in its own right, has sustainability assets and locational benefits that are comparable if not superior to many other Main Service Centres.

The settlement also has a population of a scale comparable with the other Main Service Centres. Past completion rates (1976 -2011) are similarly comparable.

The approach of the Local Plan is to manage pressures for development within and adjacent to the defined settlement boundary of Pinchbeck as it is likely to continue to be location where housing needs will arise.

Officer Recommendation:

No change to the Policy is recommended

ID1: 484 comment\_author: Mrs P Ivatt

comment content:

has submitted a site to the south of Wha024 for consideration. This is an implied objection to the position of the settlement boundary for Whaplode Drove, which excludes the site, and the position of Whaplode Drove in the settlement hierarchy and the consequent approach for development in Whaplode Drove.

Officer Comment:

Whaplode Drove is a small settlement with a low sustainability of settlement assessment score that is comparable with other settlements in the Other Service Centres and Settlements category.

The objector's site is largely separated from the settlement boundary by the SHLAA site Wha024. A combined site of the objectors site and Wha024 could result in over 80 additional houses (@ 20 to the ha).

The low sustainability score and relatively poor connectivity to the nearest Main Service Centre of Crowland does not support the case for re-categorizing Whaplode Drove to a Minor Service Centre or extending the settlement boundary to include the objector's site.

Officer Recommendation:

No change to the Policy is recommended

ID1: 485 comment\_author: G R Merchant

comment content:

has submitted a revised Wsn014. It now extends the same depth as Carrisbrooke Way. This is an implied objection to the position of the settlement boundary for Weston Hills St Johns, which excludes the site, and the position of Weston Hills St Johns in the settlement hierarchy and the consequent approach for development in Weston Hills St Johns.

Officer Comment:

Weston Hills St Johns is a small settlement within the proposed Other Service Centre and Settlement category. It is the strategy of the Plan to meet the objectively assessed housing needs within more sustainable and accessible settlements rather than distribute the housing need throughout all settlements or where SHLAA sites have been submitted.

The Objector's site is one of a number submitted for the settlement. The reduction in size of the site now put forward would potentially bring forward an additional 20 houses for the settlement. However the only rationale for supporting further development in Weston Hills St Johns is the availability of SHLAA sites. This is not considered to be a robust approach to meeting the housing needs of the Plan Area in the most sustainable locations.

The Rural Exception Sites policy would allow a specific housing need to be met in the settlement where community, economic and environmental benefits would be realised.

Officer Recommendation:

No change to the Policy is recommended.

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

ID1:

486

comment\_author:

Sutton St James Parish Council

comment\_content:

Sutton St James Parish Council would support any development that had the least impact on its existing residents, highways and infrastructure and was inclusive of affordable housing. Consideration should be given to Anglia Water's cordon sanitaire surrounding the sewer works within the village

Officer Comment:

Support for the Housing requirement is welcome.

Officer Recommendation:

No change to the approach is required.

ID1:

487

comment\_author:

Nick Grace

comment\_content:

The principal purpose of these representations are to confirm that our client's Caulton Field, Littleworth Drove, Deeping St Nicholas " Site Ref: Dsn007 is suitable, available and deliverable for residential development. We SUPPORT its allocation as a housing site to meet the housing needs of South Holland & SE Lincs now and during the lifetime of this emerging Local Plan. Furthermore that the land should be identified as a preferred option for housing in the forthcoming Publication Draft Local Plan (anticipated in June July 2016) on the basis that its current identification is an option for housing in Deeping St Nicholas. There is current developer interest in the site and a noise assessment has been undertaken. We consider that by the end of March 2016 we will be able to submit an outline planning application for an up to level of dwellings on this site. At this stage the figure has not been fixed.

Officer Comment:

A comment was received supporting the allocation of the site.

The site scores exactly the same as Dsn005 in the Sustainability Appraisal and has the same issues in the SHLAA, such as the impact of the railway, which is experiencing a growth in traffic. It also has the same flood risk. The only difference is this site does not have a public objector and a planning application has been submitted upon it.

Officer Recommendation:

Conclusions on site Dsn007 – It is considered that site Dsn007 is not a suitable Potential Housing Site in Deeping St Nicholas, and should not be taken forward as a Preferred Housing Site because:

- Although a planning application has been submitted on the site, it is affected by the railway line, which is likely to experience increased traffic in light of the recent upgrade to the line and potential future Rail Freight Interchange at Deeping Fen and consequently is likely to affect the site's amenity.

ID1: 489 comment\_author: Nick Grace

## comment content:

The principal purpose of these representations are to confirm that Land North of Church Lane, Donington - Site Ref: Don033 - is suitable, available and deliverable for residential development. We SUPPORT its allocation as a housing site to meet the housing needs of South Holland & SE Lincs now and during the lifetime of this emerging Local Plan. Furthermore that the land should be identified as a preferred option for housing in the forthcoming Publication Draft Local Plan (anticipated in June " July 2016) on the basis that its current identification is an option for housing in Donington. There IS current developer interest in the site. Since 2012 my client has also been approached by local housebuilders who have made offers for the site. As stated above this site has significant developer interest. It measures circa 10 Hectares and has the potential to improve the character of the area by delivering a mix of homes, open space and possibly wider public benefits such as a school delivery drop off area. As such the site has unique potential in Donington to deliver a planned (possibly phased) housing development with wider public benefits which could not be delivered on other site options in Donington. As the LPA have identified the land has the lowest flood risk and two points of vehicular access (Church Lane & Browntoft Lane). This would necessitate no need to form a new access point off the A52. Its location is highly sustainable with its southern boundary facing the local school. Without question this would allow children to walk to school and so the site scores very highly in terms of sustainability compared to other site options in Donington. It would also not necessitate traffic flows to funnel down Station Street to access the A52. The

## Officer Comment:

Confirmation of suitability, availability, developer interest and deliverability is welcome. The mix of houses, the proposed phasing and the physical and community infrastructure proposed for the site is noted. The potential to incorporate a drop-off area for the school is noted. The site is within Flood Zone 1, flood hazard in 2115 is classified as 'no hazard', and flood depth in 2115 is classified as 'no hazard' one of the most sequentially preferable sites in Donington. The Highways Authority identifies that 'the carriageways of Church Lane and Browntree lane are suitable to serve residential development but frontage footways and connections to the existing footpath network, together with kerbs and drainage are required. It appears that a satisfactory, straightforward vehicular access could be provided to this site. The site is within 350m of the town centre, a secondary school and other local facilities.

## Officer Recommendation:

The scale of housing growth proposed for Donington took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. This site has the capacity to provide for 203 dwellings at 20 dwellings to the hectare, (whereas the reality is that most sites will be developed at a higher density), which if taken with other appropriate sites would exceed the housing requirement for Donington, which based on the evidence available is not sustainable. Several smaller sites are preferred to help spread the housing delivery and provide a better housing mix and product offer in the area. Site Don033 is not one of the more suitable Potential Housing Sites in Donington, and it should not be taken forward as Preferred Option Housing Allocation.

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site is also within walking distance of the High Street and the principal amenities and services which Donington offers to residents.

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ID1:	490	comment_author:	G R Merchant
comment_content:	<p>has resubmitted a site adjacent Red House Hill Farm for housing. This was submitted to the Strategic Housing Land Assessment and referenced Wha017. This is an implied objection to the position of the settlement boundary for Saracens Head, which excludes the site, and the position of Saracens Head in the settlement hierarchy and the consequent approach for development in Saracens Head.</p>	Officer Comment:	Officer Recommendation:
		<p>Saracen's Head has a low sustainability of settlement assessment score that is comparable with settlements in the Other Service Centres and Settlements category. The community assets serving the settlement are to the east of the A17 and this major road effectively severs the main part of Saracen's Head (as defined by the settlement boundary) from the properties to which Wha017 adjoins.</p>	No change to the Policy is recommended
		<p>There are infill development opportunities within the defined settlement boundary of Saracen's Head which represent much better options in terms of access to the services within the village.</p>	
		<p>The objector provides no evidence to support either a change to the settlement boundary for Saracen's Head or the re-categorization to a Minor Service Centre.</p>	

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ID1: 492 comment\_author: G R Merchant

comment content:

has submitted a site for consideration for housing on Marsh Road, to the south of Midsummer House. This is an implied objection to the position of the settlement boundary for Gedney Drove End, which excludes the site, and the position of Gedney Drove End in the settlement hierarchy and the consequent approach for development in Gedney Drove End.

Officer Comment:

Gedney Drove End is a small settlement with a low sustainability of settlement score assessment that is comparable with other settlements in the Other Service Centres and Settlements category.

The Objectors site would extend the settlement southwards to allow an additional few houses fronting the Marsh Road. As the only rationale to support additional development is the availability of the site it could clearly be repeated (as linear extensions) elsewhere in the settlement. It is considered that there are better located infill opportunities within the defined settlement boundary.

Gedney Drove End is in the worst flood risk category of "danger for all" and it would be difficult to meet the Exceptions Test for additional housing.

The objector provides no evidence to support either a change to the settlement boundary for Gedney Drove End or the re-categorization to a Minor Service Centre.

Officer Recommendation:

No change to the Policy is recommended

ID1: 493 comment\_author: G R Merchant

comment content:

has resubmitted a site that was previously submitted to the Strategic Housing Land Assessment. It was given the reference Mou036. This is an implied objection to the position of the settlement boundary for Moulton Seas End, which excludes the site, and the position of Moulton Seas End in the settlement hierarchy and the consequent approach for development in Moulton Seas End.

Officer Comment:

Moulton Seas End is a small settlement with a low sustainability of settlement score assessment that is comparable with other settlements in the Other Service Centres and Settlements category.

Mou036 would allow for a few additional houses but the only rationale for this would be availability of sites. This could be repeated in other locations adjoining the settlement based upon this singular consideration. There are infill opportunities within the settlement boundary.

The objector provides no evidence to support either a change to the settlement boundary for Moulton Seas End or the re-categorization to a Minor Service Centre.

Officer Recommendation:

No change to the Policy is recommended

ID1: 495 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 to 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

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

ID1: 496 comment\_author: Michael Patterson

comment content:

The 2011 census shows 1582 households in the Swineshead and Holland Fen ward. There are no precise figures but I would estimate that about 1200 of those are in Swineshead itself. The draft local plan seeks to increase housing units in Swineshead by 400, an increase of 33% over the existing number of households. In my view that is an excessive growth rate. An increase of 200 units would be more appropriate, allowing the village to grow organically rather than through the building of large new housing estates which would change the character of the village.

Officer Comment:

It is not accepted that the development of 400 dwellings in Swineshead would inevitably harm the village's character – much depends upon the sites selected, and the sensitivity of the schemes for their eventual development. The housing requirement is for a 25 year period, and amounts to an average of 16 per year – it is considered that the village can accommodate this pace of growth without harm to its community cohesion

Officer Recommendation:

No change is required to Swineshead's housing requirements.

ID1: 497 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 120 new housing site allocations for Quadring, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Quadring with its existing good level of village services.

Officer Comment:

The support for Quadring's proposed housing requirement of 120 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the housing paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Following to these comments it is considered that a change to Quadring's housing requirements is required and the Local Plan should identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

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

ID1: 498 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12 , which provides for 80 new housing site allocations for Deeping St Nicholas, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). Deeping St Nicholas offers a mid point location between South Holland and Peterborough and its close proximity to the various Trunk road networks makes it an excellent location for any additional housing in the district, that may be considered appropriate, if additional allocations through Local Plan policy amendments come forward

Officer Comment:

The support for Deeping St Nicholas's proposed housing requirement of 80 dwellings is welcome. We will reconsider housing numbers when we receive updated population data.

Officer Recommendation:

No change to the approach is required.

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

ID1: 499 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 120 new housing site allocations for Quadring, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Quadring with its existing good level of village services.

Officer Comment:

The support for Quadring's proposed housing requirement of 120 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the housing paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Due to these comments it is considered that a change to Quadring's housing requirements is required and the Local Plan should identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

ID1: 500 comment\_author: Sutton Bridge PC

comment content:

Additional new homes will place considerable pressure on the Sutton Bridge Medical Centre. It is reported that currently, each Doctor has two and a half times more his/her recommended quota of patients. Furthermore, we are led to believe that the current financial arrangement relating to the lease of the building makes it virtually impossible to attract doctors in order to replace those who are retiring.

Officer Comment:

The Local Plan will have to demonstrate how arising infrastructure needs will be met. This will be evidenced through the Infrastructure Delivery Plan and subsequent versions of the Local Plan. The CCG's have commented that currently there is some capacity at the local GP surgery(ies) to accommodate additional patients, however County-wide there is an increasing shortage of GP's, nurses and other healthcare staff which could affect future capacity should demand increase.

Officer Recommendation:

No change required.

ID1: 501 comment\_author: G R Merchant

comment content:

has resubmitted Wsn014. This is an implied objection to the position of the settlement boundary for Weston Hills St Johns, which excludes the site, and the position of Weston Hills St Johns in the settlement hierarchy and the consequent approach for development in Weston Hills St Johns.

Officer Comment:

Weston Hills St Johns is a small settlement within the proposed Other Service Centre and Settlement category. It is the strategy of the Plan to meet the objectively assessed housing needs within more sustainable and accessible settlements rather than distribute the housing need throughout all settlements or where SHLAA sites have been submitted.

The Objector's site is one of a number submitted for the settlement. It is also the case that the same site Wsn014 has also been resubmitted as a reduced site (record 471). However the only rationale for supporting further development in Weston Hills St Johns is the availability of SHLAA sites. This is not considered to be a robust approach to meeting the housing needs of the Plan Area in the most sustainable locations. By submitting Wsn014 as two "size" options further demonstrates that the only rationale for prompting these sites is availability.

The Rural Exception Sites policy would allow a specific housing need to be met in the settlement where community, economic and environmental benefits would be realised.

Officer Recommendation:

No change to the Policy is recommended

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

ID1: 502 comment\_author: Tim Taylor & Sarah Bull

## comment content:

We are writing in reference to the proposed planning for housing in the Kirton / Frampton area, in the Boston Borough. FRA024. We live on the opposite side of Middlegate Road West to FRA024, and we have the following concerns to the proposed area for housing: We currently have low water pressure at our property, therefore if houses were built in the area there would need to be significant work on the water supply to increase the pressure to supply this area. This is also the case for the sewage drainage to our property. We regularly have sewage pipes blocking where we have to flush our drains through and get it moving again. This is due to the sewage not draining, and not anything blocking the sewage from flowing. We would have concerns that such a large number of houses being built in FRA024 would cause the sewage flow to get worse. During the summer months we can smell the sewage works which is just off the A16. If the proposed area of housing were to go ahead then they would be closer to the sewage works, therefore they would be more likely to smell the sewage works than what we currently do now. Also would this be a concern to residents health? The other impact on Middlegate Road West would be the amount of traffic using the road. Currently you struggle to get two cars side by side at the entrance to the road from the A16. There are numerous pot holes or area's where the road is sinking slightly causing a sharp impact on a cars suspension. We ensure that we remain below the 30mph limit on our road due to the children and also the number of cats and dogs in the area. However you can watch many a car, and even a number of lorries and tractors exceeding this speed limit and in turn shaking the property. This traffic on

## Officer Comment:

Anglian Water has commented that, whilst water resources are adequate to serve the proposed growth, upgrades to the supply network may be required to serve some sites. Anglian Water has commented that enhancements to the capacity of the foul sewerage network may be necessary to accommodate the development of the site. The Local Plan will need to demonstrate how such infrastructure needs will be met, and these matters will be dealt with in later versions of the document and the Infrastructure Delivery Plan that will accompany it. Site Fra024 approaches within 450m of the Frampton Water Recycling Centre, and new homes may suffer smell or other disturbance. The Highway Authority has identified that the carriageway of Middlegate Road (West) is suitable to serve residential development on site Fra024.

The support for site Kir037 is welcomed

## Officer Recommendation:

Site Fra024 should not be taken forward as a Preferred Housing Site.

Site Kir037 should be taken forward as a Preferred Housing Site.

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

the road would only increase if there were additional housing in FRA024, causing concern for the current residents on Middlegate Road West.

If you were to ask us to choose an area in Kirton/Frampton, we would suggest area KIR037, where the housing would be closer to the village centre and schools, and it would also provide a better use of the underused industrial area.

ID1:	503	comment_author:	Longstaffs		
comment content:	<p>We consider the proposed Policy 12 , which provides for 230 new housing site allocations for Gosberton, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Gosberton with its existing high level of village services (it being the highest ranking settlement in the Minor Service village category - with a sustainability score of 87).</p>	Officer Comment:	<p>The support for Gosberton 's proposed housing requirement of 230 dwellings is welcome. We will reconsider housing numbers when we receive updated population data.</p> <p>The Gosberton Risegate and Clough Housing paper suggests that the 40 dwelling allocation is added to Gosberton's allocation.</p>	Officer Recommendation:	<p>Due to these comments it is considered that a change to Gosberton's housing requirements is required and the Local Plan should identify housing allocations in Gosberton for 270 dwellings between April 2011 and 31st March 2036.</p>

ID1: 504 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 230 new housing site allocations for Gosberton, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Gosberton with its existing high level of village services (it being the highest ranking settlement in the Minor Service village category with a sustainability score of 87).

Officer Comment:

The support for Gosberton 's proposed housing requirement of 230 dwellings is welcome. We will reconsider housing numbers when we receive updated population data.

The Gosberton Risegate and Clough Housing paper suggests that the 40 dwelling allocation is added to Gosberton's allocation.

Officer Recommendation:

Due to these comments it is considered that a change to Gosberton's housing requirements is required and the Local Plan should identify housing allocations in Gosberton for 270 dwellings between April 2011 and 31st March 2036.

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

ID1:	505	comment_author:	Longstaffs		
comment content:	<p>we consider the proposed Policy 12 , which provides for 10,750 new housing site allocations for South Holland, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to some village settlements, and therefore housing allocation number increased could be required for the villages.</p>	Officer Comment:	<p>The housing need to be met as evidenced by the SHMA's also requires a strategy to provide for these needs to be met in a sustainable way. It is considered that there is flexibility within the strategy to meet development needs outside the sub-regional centres. In the case of South Holland about 50% of development opportunities for housing are outside Spalding.</p> <p>There is no degree of certainty or evidence provided with regard to what specific development patterns will evolve as a result of potential population increases through continuing in-migration.</p>	Officer Recommendation:	<p>No change to the Policy is recommended</p>

ID1:	506	comment_author:	Longstaffs		
comment content:	<p>we are disappointed to note that the site Hob043 has not been selected as a 'Potential Housing site'. To remedy the failing to provide for some future housing in the village, we hereby put forward an alternative area of frontage land only, on Clough Road, mirroring the development of Local Authority housing opposite. The site is immediately adjacent to the new Anglian Water Foul Sewerage facility.</p>	Officer Comment:	<p>This has been registered as Hob054 in the SHLAA</p>	Officer Recommendation:	<p>The site should not be taken forward as a Preferred Housing Site.</p>

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

ID1: 507 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12, which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

ID1: 508 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12, which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

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

ID1: 509 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12, which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

ID1: 510 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12, which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

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

ID1: 511 comment\_author: Cllr Sally Slade

comment\_content:

I support the possibility of increased infilling in Surfleet Seas End and would like this to be recognised as part of Surfleet, not as a separate village. It is one parish.

Officer Comment:

The first section of this housing paper considered the spatial strategy of Surfleet and Surfleet Seas End. It is accepted that the two settlements are treated as one and as such SHLAA sites that were submitted in Surfleet Seas End can be reconsidered as previously they may have been inconsistent with the approach for 'Other Service Centres and Settlements'.

Officer Recommendation:

Surfleet and Surfleet Seas End are merged into one settlement called Surfleet.

ID1: 512 comment\_author: Miss S Walker

comment\_content:

Comments in relation to Swineshead: With regard to the village as a whole, I have settled here well as has my family and after having come from a built up urban area it was nice to meet friendly residents and for the village to not be that big that it wasn't difficult to recognise most people. If the village is increased by 400 houses that is at least another 800 adults, it would then have the feeling of a small town and lose that local village feeling.

Officer Comment:

It is not accepted that the development of 400 dwellings in Swineshead would inevitably harm the village's character – much depends upon the sites selected, and the sensitivity of the schemes for their eventual development. The housing requirement is for a 25 year period, and amounts to an average of 16 per year – it is considered that the village can accommodate this pace of growth without harm to its community cohesion

Officer Recommendation:

No change is required to Swineshead's housing requirements.

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

ID1: 513 comment\_author: Maz Culy

comment content:

I live in Pinchbeck and moved here because it is an independent village. Spalding as a whole cannot sustain 4000 more families. The 3 Dr's surgeries are so full it is almost impossible to get an appointment as it is, add to this Munro is still struggling to appoint full time GP's to work there mainly I would think because of the demanding work load and over stretched surgery. Yes I know progress states you have to move forward but I think Spalding and surrounding villages needs time to accommodate the influx of new homes/families we have had in the past 8 years or so. We need time for all the promises made then by the councils like shops, schools etc. Along Woolram Wygate. Please please think before you give permission for the 4000 homes based purely on your budgets and meeting targets set before the towns and surrounding villagers needs. This is Our homes. Our lives. Our future.

Officer Comment:

The Local Plan will have to demonstrate how arising infrastructure needs will be met, and these matters will be dealt with in later versions of the document and the Infrastructure Delivery Plan that will accompany it;

Officer Recommendation:

It is not considered that the comments made by consultees justify a change to Spalding's housing requirements. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding's housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

ID1: 514 comment\_author: Mr Andrew Parks

comment content:

As for the nominated development areas I fully support the need for additional housing and affordable housing in particular.

Officer Comment:

Comments noted

Officer Recommendation:

No change to the Local Plan is recommended

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

ID1: 515 comment\_author: Mr Leonard Parker

comment\_content:

I agree with development of Quadring but would like to see development of land to the south east which would take traffic away from the one major crossroads in the village. I would like to see development of land behind 47 Main Road and 11a Sarah Gate which can only add to existing settlement and has necessary drainage for additional settlement.

Officer Comment:

The support for Quadring's proposed housing requirement of 120 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Due to these comments it is considered that a change to Quadring's housing requirements is required and the Local Plan should identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

ID1: 516 comment\_author: Mr Colin Kenny

comment\_content:

I agree with development of Quadring but would like to see development of land to the south east which would take traffic away from the one major crossroads in the village. I would like to see development of land behind 47 Main Road and 11A Sarah Gate which can only add to existing settlement and has necessary drainage for additional settlement.

Officer Comment:

The support for Quadring's proposed housing requirement of 120 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Due to these comments it is considered that a change to Quadring's housing requirements is required and the Local Plan should identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

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

ID1: 517 comment\_author: Mrs Gillian Parker

comment\_content:

I agree with developing Quadring. I think there should be more development behind 47 Main Road, Quadring. I don't think the existing infrastructure should be damaged by over developing the centre of Quadring.

Officer Comment:

The support for Quadring's proposed housing requirement of 120 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Due to these comments it is considered that a change to Quadring's housing requirements is required and the Local Plan should identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

ID1: 518 comment\_author: Mr Stephen Whitmore

comment\_content:

I agree with development in Quadring. I would like to see more community areas like neighbouring Gosberton and Donington. I don't think the crossroads should be congested as the Local Plan development shows. Development to the south east would mean there isn't any congestion.

Officer Comment:

The support for Quadring's proposed housing requirement of 120 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Due to these comments it is considered that a change to Quadring's housing requirements is required and the Local Plan should identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

ID1: 519 comment\_author: Mr Chris Iszatt

comment content:

I would like to see more development of Quadring to the south east. Development on Sarah Gate would take the traffic from the one main cross roads in the centre of the village.

Officer Comment:

The support for Quadring's proposed housing requirement of 120 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Due to these comments it is considered that a change to Quadring's housing requirements is required and the Local Plan should identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

ID1: 520 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 150 new housing site allocations for Surfleet, but none for Surfleet Seas End, to potentially be corrected by our point 1 above. If so, we would support the suggestions for housing within the defined settlement boundaries, and the new proposed sites suggested as potential Housing sites. In respect of the possibility that the settlement classifications are not changed as proposed by us above, we note that the proposed inset plans provide for a redefined settlement boundary for the villages, and we consider these are a sensible return to previous planning policy, and should allow for the needed additional infill dwellings in the village to support the role of the settlements as service centres, and help sustain existing facilities or helps meet the service needs of other local communities. We are strongly of the belief that flexibility in the number of new housing allocations is needed, as we consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for villages like Surfleet with good village services.

Officer Comment:

The support for Surfleet’s proposed housing requirement of 150 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Øwing to these comments it is considered that a change to Surfleet’s housing requirements is required and the Local Plan should identify housing allocations in Surfleet for 180 dwellings between April 2011 and 31st March 2036.

Officer Recommendation:

A change to the Policy is recommended

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

ID1: 521 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

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

ID1: 522 comment\_author: Longstaffs

## comment content:

we consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District. However we have noted the prioritisation of the suggested development of land in the north west quadrant of Spalding, and consider that the South East Lincolnshire Forward Planning team, appear to be concentrating all their efforts to open up an additional area for housing development, north/west of The Vernatts/Joint Railway Line. There is also extensive development consented already in the south west sector. Because we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the South east sector could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South

## Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding's housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

We are updating the Strategic Flood Risk Assessment for South Holland District. Evidence we have at present suggests the South East Quadrant is less preferable in respect of the sequential test.

Other sites to the south of the Vernatts Drain and adjacent Horseshoe Road are being put forward as Preferred Sites for development.

## Officer Recommendation:

Increase the Spalding housing allocation to 5880.

west of Spalding) to have a potential to provide housing development in the Spalding district. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability for those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horseshoe Road, it would do a lot to improve the traffic congestion in the town, but until it is completed from Spalding Common to Pinchbeck Road, the Western relief road cannot be a relief to the whole of Spalding, and therefore deliverability of the full effect is very long term possibly 30-50 years. Surely before consideration is given to any more development on the north west of the town, the sections of the relief road to the south (Horseshoe Road to Spalding Common), and north (Wygate Park to Pinchbeck Road) should be completed as a priority before any opening up of further tranches of land North/west of the Vernatts/Joint Railway Line, for housing development takes place in the area, otherwise all that will occur more traffic will be delivered onto the already congested Pinchbeck Road area, from the dwellings planned on these additional preferred housing sites. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of

reducing the segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside going west and south west of Spalding in this area is sensible going north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of a second area of Preferred Housing sites in the South east, to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of development opportunities. Including land in the South eastern area may allow individual and smaller developers the chance of building to a different style rather than being controlled by so few developers. It is in close proximity to primary and secondary schools, doctors, and the town centre. Locationally, it is an obvious region to develop without the need for expensive infrastructure, being close to the A16 Bypass, skirting the eastern areas of the town. Whilst the site is in a flood risk area, all the land around Spalding is virtually the same level. The level at Spalding Common, and right round to north of the Vernatts is virtually the same as Clay Lake, but because the land in Cowbit Wash acts as a flood plain with a considerable area that would flood before Clay Lake, the South East Quadrant may be a better area. Carefully designed housing, with raised floor levels could all negate the issue of flooding. Additionally, the land in the Clay Lake area is a poorer

grade of farmland than the Spalding Common,  
Horseshoe Road and areas north/west of The  
Vernatts/Joint Railway Line.

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

ID1: 523 comment\_author: Longstaffs

## comment content:

we consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District. However we have noted the prioritisation of the suggested development of land in the north west quadrant of Spalding, and consider that the South East Lincolnshire Forward Planning team, appear to be concentrating all their efforts to open up an additional area for housing development, north/west of The Vernatts/Joint Railway Line. There is also extensive development consented already in the south west sector. Because we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the South east sector could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South west of Spalding) to have a

## Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding's housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

We are updating the Strategic Flood Risk Assessment for South Holland District. Evidence we have at present suggests the South East Quadrant is less preferable in respect of the sequential test.

Other sites to the south of the Vernatts Drain and adjacent Horseshoe Road are being put forward as Preferred Sites for development.

## Officer Recommendation:

Increase the Spalding housing allocation to 5880.

potential to provide housing development in the Spalding district. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability for those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horseshoe Road, it would do a lot to improve the traffic congestion in the town, but until it is completed from Spalding Common to Pinchbeck Road, the Western relief road cannot be a relief to the whole of Spalding, and therefore deliverability of the full effect is very long term possibly 30-50 years. Surely before consideration is given to any more development on the north west of the town, the sections of the relief road to the south (Horseshoe Road to Spalding Common), and north (Wygate Park to Pinchbeck Road) should be completed as a priority before any opening up of further tranches of land North/west of the Vernatts/Joint Railway Line, for housing development takes place in the area, otherwise all that will occur more traffic will be delivered onto the already congested Pinchbeck Road area, from the dwellings planned on these additional preferred housing sites. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the

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

ID1: 524 comment\_author: Longstaffs

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

ID1: 525 comment\_author: Longstaffs

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

than the Spalding Common, Horseshoe Road and areas north/west of The Vernatts/Joint Railway Line. We wish to include an additional area of land to the previously submitted site area, land that has been added to our client's ownership, which we believe provides a better access connection for the South East Quadrant to the A16 Bypass and onwards links to Peterborough and the South.

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ID1:	526	comment_author:	Mr Richard Whitelam
comment content:	Officer Comment:	Officer Recommendation:	
General concern at the number of houses proposed for Holbeach and the increase in traffic through the town. The traffic lights in the centre of town are likely to become very busy and I am concerned that due to the traffic from the new housing proposal off of Northons Lane traffic headed for Peterborough will migrate through Netherfield, Langwith Drive etc. and not use the A road from Spalding to Peterborough.	New development will inevitably generate additional vehicle movements; the Highways Authority have raised no objections to the overall housing requirement for Holbeach in terms of highways safety and congestion and have recognised that all of the sites have the potential to be accessible on foot and bicycle. The proposed improvements to the Peppermint Junction (A151/A17) adjacent to Holbeach should help reduce traffic flows passing through the town centre.	No change required.	

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ID1: 527 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 80 new housing site allocations for Gedney Church End, in the plan period 2011-2036, (reduced from 100 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), so if numbers swing by the 25% range as seen above, it may give rise to further allocations being requirement than the existing Objectively assessed Housing need (OAHN) figures show. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the villages with good existing high levels of village services.

Officer Comment:

Concerns were raised about Gedney Church End about:

- treating Gedney Church End and Gedney Black Lion End differently when they score the same in the Sustainability of Settlements study. It exacerbates the split in the village.
- the classification of Gedney Church End as a 'Minor Service Centre'
- the scale of population increase and it being more than envisaged in Boston, Spalding and Main Service Centres
- the lack of facilities and the inability of the utilities to cope with the proposed development.

Officer Recommendation:

Gedney Church End should be re-categorised as Other Service Centres and Settlements and along with Gedney Black Lion End named 'Gedney' and shown on one map. As a result no sites will be allocated. Infill development within the settlement boundary would be acceptable. The development boundary has been drawn across Ged025 to link the rear boundaries of those properties that front Tops Gate and Church End so that it does not adjoin the curtilage of the Church.

ID1: 528 comment\_author: Longstaffs

comment content:

Fle010 we consider the proposed Policy 12 , which provides for 120 new housing site allocations for Fleet Hargate, in the plan period 2011-2036, (reduced from 150 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations.

The 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area, so if numbers swing by the 25% range as seen above, it may give rise to further allocations being requirement than the latest Objectively assessed Housing need (OAHN) figures show. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the villages with good existing high levels of village services lie Fleet Hargate.

Officer Comment:

The support for Fleet Hargate’s proposed housing requirement of 120 dwellings is welcome. We will reconsider housing numbers when we receive updated population data.

However, a slight increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Consequently it is considered that a change to Fleet Hargate’s housing requirements, is required and the Local Plan should identify housing allocations of 150 dwellings between April 2011 and 31st March 2036.

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

ID1: 529 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12 , which provides for 190 new housing site allocations for Pinchbeck, in the plan period 2011-2036, (reduced from 250 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dwellings per annum (dpa) for the district), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations. The fact that the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area, shows numbers can swing by 25%, and we consider it gives merit to a greater number of allocations being provided for, than the current Objectively assessed Housing need (OAHN) figures show. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Pinchbeck with its existing high level of village services.

Officer Comment:

A slight increase in the housing requirement is considered necessary, based upon the availability of a range of small and medium sized sites in Pinchbeck, with the potential to deliver a good mix of housing in the early part of the plan period. Consequently, it is considered that a change to Pinchbeck's housing requirement should be made, and that the Local Plan should provide for 240 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Pinchbeck housing allocation to 240

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

ID1: 530 comment\_author: Mr Peter Bird

comment\_content:

I am opposing further housing development in Crowland because insufficient concern has been shown for accessing the old A1073 by-pass (now James Road). If this issue is taken care of I would not oppose further housing development.

Officer Comment:

The Highways Authority have identified no adverse impacts relating to the amount of new development proposed for Crowland on the local highway network.

Officer Recommendation:

No change required.

ID1: 531 comment\_author: Longstaffs

comment\_content:

we consider the proposed Policy 12 , which provides for 80 new housing site allocations for Cowbit, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), as we consider current immigration increases in the District will increase housing needs above and beyond the previous levels of the 2014 SHMA.

Officer Comment:

The support for Cowbit's proposed housing requirement of 80 dwellings is welcome; However, a slight increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Owing to these comments it is considered that a change to Cowbit's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036.

Officer Recommendation:

Owing to these comments it is considered that a change to Cowbit's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036.

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

ID1: 532 comment\_author: Longstaffs

## comment content:

Whilst Weston Hills Austendyke is not classified as a settlement within the draft proposals, Policy 12, and therefore there are no proposals to provide any new housing site allocations, we would comment that during the plan period 2011-2036, allocations of 430 dwellings per annum (dpa) for the district are suggested. We note that this has been reduced to reflect the Peterborough Sub region Strategic Housing market assessment " 2015 update. We believe there should be a great degree of flexibility in the number of new housing allocations, as the fact that the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area, shows numbers can swing by 25%, and we consider it gives merit to a greater number of allocations being provided for, than the current Objectively assessed Housing need (OAHN) figures show. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Pinchbeck with its existing high level of village services.

## Officer Comment:

Weston Hills Austendyke is classified as an "Other Service Centre and Settlement" which will be joined with Weston Hills St Johns and called Weston Hills. The Settlement Boundary allows for some infill development.

## Officer Recommendation:

No change to the approach is required.

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

ID1: 533 comment\_author: Longstaffs

## comment content:

we consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District. However we have noted the prioritisation of the suggested development of land in the north west quadrant of Spalding, and consider that the South East Lincolnshire Forward Planning team, appear to be concentrating all their efforts to open up an additional area for housing development, north/west of The Vernatts/Joint Railway Line. There is also extensive development consented already in the south west sector. Because we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the South east sector could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South west of Spalding) to have a

## Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding's housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

We are updating the Strategic Flood Risk Assessment for South Holland District. Evidence we have at present suggests the South East Quadrant is less preferable in respect of the sequential test.

Other sites to the south of the Vernatts Drain and adjacent Horseshoe Road are being put forward as Preferred Sites for development.

## Officer Recommendation:

Increase the Spalding housing allocation to 5880.

potential to provide housing development in the Spalding district. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability for those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horseshoe Road, it would do a lot to improve the traffic congestion in the town, but until it is completed from Spalding Common to Pinchbeck Road, the Western relief road cannot be a relief to the whole of Spalding, and therefore deliverability of the full effect is very long term possibly 30-50 years. Surely before consideration is given to any more development on the north west of the town, the sections of the relief road to the south (Horseshoe Road to Spalding Common), and north (Wygate Park to Pinchbeck Road) should be completed as a priority before any opening up of further tranches of land North/west of the Vernatts/Joint Railway Line, for housing development takes place in the area, otherwise all that will occur more traffic will be delivered onto the already congested Pinchbeck Road area, from the dwellings planned on these additional preferred housing sites. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the

segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside going west and south west of Spalding in this area is sensible going north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of a second area of Preferred Housing sites in the South east, to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of development opportunities. Including land in the South eastern area may allow individual and smaller developers the chance of building to a different style rather than being controlled by so few developers. It is in close proximity to primary and secondary schools, doctors, and the town centre. Locationally, it is an obvious region to develop without the need for expensive infrastructure, being close to the A16 Bypass, skirting the eastern areas of the town. Whilst the site is in a flood risk area, all the land around Spalding is virtually the same level. The level at Spalding Common, and right round to north of the Vernatts is virtually the same as Clay Lake, but because the land in Cowbit Wash acts as a flood plain with a considerable area that would flood before Clay Lake, the South East Quadrant may be a better area. Carefully designed housing, with raised floor levels could all negate the issue of flooding. Additionally, the land in the Clay Lake area is a poorer grade of farmland

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than the Spalding Common, Horseshoe Road and areas north/west of The Vernatts/Joint Railway Line.

ID1:	534	comment_author:	BD and AH Naylor		
comment_content:	BD and AH Naylor have submitted a site for consideration as a housing site. It is to the south of and between a row of dwellings on Old Main Road and Lloyds Farm. This is an implied objection to the position of the settlement boundary for Fosdyke, which excludes the site, and the position of Fosdyke in the Settlement hierarchy and the consequent approach for development in Fosdyke.	Officer Comment:	<p>Fosdyke is a small settlement with a low sustainability of settlement assessment score that is comparable with other settlements in the Other Service Centres and Settlements category.</p> <p>The Objector's site would continue linear development allowing a small number of houses. The rationale for doing so would be purely because a site is available. Clearly this could be repeated in other places adjoining the settlement boundary. There are infill development opportunities within the development boundary.</p> <p>Fosdyke has vulnerability in terms of flood risk and the objector's site comes within the "danger for most" assessment. It would be difficult to meet the Exceptions Test in providing a rationale for development based upon the housing needs evidence for the Borough combined with a strategy that seeks to provide for such development needs within the most sustainable locations.</p> <p>Under the Rural Exceptions Sites policy specific housing needs for the settlement could come forward.</p>	Officer Recommendation:	No change to the Policy is recommended

ID1: 535 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 230 new housing site allocations for Gosberton, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Gosberton with its existing high level of village services (it being the highest ranking settlement in the Minor Service village category with a sustainability score of 87).

Officer Comment:

The support for Gosberton 's proposed housing requirement of 230 dwellings is welcome. We will reconsider housing numbers when we receive updated population data.

The Gosberton Riseagate and Clough Housing paper suggests that the 40 dwelling allocation is added to Gosberton's allocation.

Officer Recommendation:

Due to these comments it is considered that a change to Gosberton's housing requirements is required and the Local Plan should identify housing allocations in Gosberton for 270 dwellings between April 2011 and 31st March 2036.

ID1: 536 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12 , which provides for 120 new housing site allocations for Quadring, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Quadring with its existing good level of village services.

Officer Comment:

The support for Quadring's proposed housing requirement of 120 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the housing paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Following to these comments it is considered that a change to Quadring's housing requirements is required and the Local Plan should identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

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

ID1: 537 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 50 new housing site allocations for Bicker, in the plan period 2011-2036, should allow for flexibility in the number of new housing allocations, as we consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for villages like Bicker with its existing good level of facilities.

Officer Comment:

The scale of the housing growth proposed for Bicker took account of the most up-to-date information on migration rates.

Officer Recommendation:

No change to Bicker's housing requirements is necessary.

ID1: 538 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12 , which provides for 380 new housing site allocations for Donington, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for villages like Donington with its existing good level of village services.

Officer Comment:

A change to Donington’s housing requirements. But, following consideration of the potential housing sites (see Section 5) and the site specific issues, it is proposed to increase the minimum housing requirement slightly, primarily to achieve a better form of development. Consequently it is considered that a change to Donington’s housing requirements should be made, and that the Local Plan should provide for 400 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the housing allocation to 400

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

ID1: 539 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12, which provides for no new housing site allocations for Sutton St Edmund, but provides for a redefined settlement boundary for the village is a sensible return to previous planning policy, and should allow for the needed additional dwellings in the village to support the role of the settlement as a service centre, and help sustain existing facilities or helps meet the service needs of other local communities. We are strongly of the belief that flexibility in the number of new housing allocation is needed, as we consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for villages like Sutton St Edmund with good village services.

Officer Comment:

The support is Welcomed.

Officer Recommendation:

No change to the approach is required.

ID1: 540 comment\_author: G Greaves

comment content:

I support Policies 11 and 12 and the principle behind the allocation of new housing sites within the District but believe that there should be flexibility regarding those allocations in order to meet actual demand for new housing, as appropriate, especially in the Main Service Centres which are capable of accommodating a greater number of dwellings.

With particular reference to Cro031 I confirm that there are no ransom strips regarding access and a baseline Flood Risk Assessment undertaken supports residential development on the site.

Officer Comment:

The support for the two policies is welcomed. Development is likely to come forward on sites that have not been allocated, either because they have not been submitted to the SHLAA for consideration, but comply with the policies of the Local Plan, or because they hold fewer than 10 dwellings. Therefore, there is flexibility in how demand will be supplied. In addition this is the first consultation and as the plan progresses the preferred/allocated sites may evolve, as well as the dwelling numbers for each settlement, as new information emerges.

Cro031 - confirmation that no ransom strips exist is noted. The Environment Agency identifies that 'the NPPF (para 101) says that 'The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding' because large areas of the Boston and Spalding are at the same probability of flooding (i.e. Land having a 1 in 100 annual probability of river flooding, or a 1 in 200 annual probability of sea (tidal) flooding) the more refined information from the SFRA maps (i.e. The hazard maps) has been used, which show not only the probability of flooding but also the consequences of flooding, to decide which sites are sequentially preferable. The submission of a FRA may satisfy the Exception Test, but you shouldn't move onto apply the Exception Test unless the Sequential Test is passed' – until the updated SFRA is available it is not possible to determine whether the site is one of the more sequentially preferable.

Officer Recommendation:

No change to the approach is required.

ID1: 541 comment\_author: G R Merchant

comment content:

has submitted a site for consideration as a housing site. It is on the western side of Broadgate and is open land to the south of number 22 . This is an implied objection to the position of the settlement boundary for Whaplode Drove, which excludes much of the site, and the position of Whaplode Drove in the Settlement Hierarchy and the consequent approach for development in Whaplode Drove

Officer Comment:

Whaplode Drove is a small settlement with a low sustainability of settlement assessment score that is comparable with other settlements in the Other Service Centres and Settlements category.

The Objector's site would provide for a small number of houses as frontage development. This would marginally extend development on the western side of Broadgate but could not be seen as infill. Chapel Green is identified as a Recreational Open Space, at least for its visual amenity value. Development on the Objector's site would compromise the open character currently provided by Chapel Green.

Infill opportunities could arise within the defined settlement boundary.

Officer Recommendation:

No change to the Policy is recommended

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

ID1: 542 comment\_author: Aspbury Planning Limited

## comment content:

As a result of the proposed Settlement Hierarchy within Policy 2 there is a requirement for a relatively large number of dwellings across a relatively small number of settlements. Concentrating dwellings in a small number of settlements will require the release of large sites which can take a number of years to come forward. To assist with housing delivery, particularly in the short term a portion of housing could be distributed to smaller sustainable settlements and delivered through small developments within or immediately adjoining the defined settlement boundaries. At this stage the Draft Local Plan has not proposed any formal allocations but instead identified on a number of inset maps potential housing sites within or immediately adjoining all settlements where new housing is proposed.

Our client, the Lincoln Diocese owns site ref: Wig009 for Wigtoft. This site is located within the proposed settlement boundary and is capable of accommodating a small scale residential development. The Diocese have previously undertaken pre application discussions with the Council where they promoted the availability of the landholding. In light of the proposed change in approach supporting 30 new dwellings for Wigtoft, this site offers a small suitable, available, deliverable and achievable option for new dwellings in the village.

Outside of sites identified within the inset maps the Diocese have two additional sites, not identified in the SHLAA or Draft Local Plan, which should be considered as potential allocations; The first lies directly south of St Leodegar s Close, Wyberton and could form an

## Officer Comment:

The Housing needs for the Plan Area are identified to be met, principally across 32 settlements most of which have a range of sites. In terms of the size of sites these range from urban extensions of 1000 plus down to 30. Some 40 Other Service Centres and Settlements also have defined Settlement Boundaries and in all defined settlements windfall and infill opportunities can arise and be considered positively.

Formal allocations will be made at the Publicaion stage of the plan following consultations on this ("site options") and the subsequent "Preferred Sites" draft.

The support for site Wig009 is welcomed. However, the site has an area of 0.33 hectares, and is assumed to be capable of accomodating just 7 dwellings. It is therefore too small in size to be a Housing Allocation. [it was identified as a Potential Housing Site in error.]

This site has been registered as Wyb039. The Strategic Housing Land Availability Assessment (SHLAA) identifies this land as being undevelopable because it would have adverse environmental impacts and is poorly located.

This site has been registered as Sut031. The Strategic Housing Land Availability Assessment (SHLAA) identifies this land as being undevelopable because it would have adverse environmental impacts.

## Officer Recommendation:

No change to the Local Plan is recommended with regard to changing the approach on the Spatial Strategy or Distribution of Housing subject to individual consideration of specific sites or settlements.

Site Wig009 should not be taken forward as a Preferred Housing Site

Site Wyb039 should not be taken forward as a Preferred Housing Site.

Site Sut031 should not be taken forward as a Preferred Housing Site.

allocation for Boston. The current proposed sites for Boston are concentrated around the main built up area of Boston. Wyberton, as an outer suburb of Boston offers a sustainable location for development with good access to a range of services and facilities Boston has to offer. Situated directly south of the settlement boundary for Boston this site offers a suitable location, outside of the designated Safeguarding Corridor which would not require significant infrastructure and could therefore be brought forward in the short term.

The second site lies to the east of Station Road, Sutterton and directly adjoins the proposed southern settlement boundary for the village. The site is well contained by development to the north and east and has a defined boundary to the south in the form of an existing drain. The site has good access and is in relative close proximity to the strategic intersection between the A16 and A17 trunk roads. The site is available now and could be delivered in the short term. Plans of the two sites proposed above have been sent separately to our representations for the Council's consideration.

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

ID1: 543 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12, which provides for no new housing site allocations for Sutton St Edmund, but provides for a redefined settlement boundary for the village is a sensible return to previous planning policy, and should allow for the needed additional dwellings in the village to support the role of the settlement as a service centre, and help sustain existing facilities or helps meet the service needs of other local communities. We are strongly of the belief that flexibility in the number of new housing allocation is needed, as we consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for villages like Sutton St Edmund with good village services.

Officer Comment:

Comments noted

Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

ID1: 544 comment\_author: Longstaffs

comment content:

we consider the proposed Policy 12 , which provides for 190 new housing site allocations for Pinchbeck, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility, in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Pinchbeck with its existing high level of village services.

Officer Comment:

A slight increase in the housing requirement is considered necessary, based upon the availability of a range of small and medium sized sites in Pinchbeck, with the potential to deliver a good mix of housing in the early part of the plan period. Consequently, it is considered that a change to Pinchbeck’s housing requirement should be made, and that the Local Plan should provide for 240 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Pinchbeck housing allocation to 240

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

ID1: 545 comment\_author: Longstaffs

## comment content:

we consider the proposed Policy 12 , which provides for 190 new housing site allocations for Pinchbeck, in the plan period 2011-2036, (reduced from 250 to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area, so if numbers swing by the 25% range as seen above, it may give rise to further allocations being required than the existing Objectively assessed Housing need (OAHN) figures show. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Pinchbeck with its existing high level of village services.

## Officer Comment:

A change to Pinchbeck’s housing requirements. However, a slight increase in the housing requirement is considered necessary, based upon the availability of a range of small and medium sized sites in Pinchbeck, with the potential to deliver a good mix of housing in the early part of the plan period. Consequently, it is considered that a change to Pinchbeck’s housing requirement should be made, and that the Local Plan should provide for 240 dwellings between 1st April 2011 and 31st March 2036.

## Officer Recommendation:

Increase the Pinchbeck housing allocation to 240

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

ID1: 546 comment\_author: Geoffrey Collins & Co

## comment content:

Only one parcel of land (now developed) was allocated in the current Local Plan for purposes of residential development in Long Sutton. This has curtailed population growth in Long Sutton over the last 10 years or so. Appendix A is a compilation for purposes of comparison as to the percentage increase in growth of a number of settlements anticipated by the draft Local Plan. It will be noted that the draft Local Plan anticipates that Long Sutton will have a population growth of 17.58% during the plan period. Long Sutton has a Sustainability Credential score of 171. Long Sutton is a Main Service Centre (an area where development is to be directed). The following is a list of some of the Minor Service Centres (areas of limited development opportunity): Quadring 19.72% (anticipated % increase in population) 19 (sustainability credentials)  
Weston 54.18% (anticipated % increase in population) 50 (sustainability credentials)  
Tydd St Mary 61.28% (anticipated % increase in population) 51 (sustainability credentials)  
Sutton St James 18.47% (anticipated % increase in population) 57 (sustainability credentials)  
Moulton 27.37% (anticipated % increase in population) 87 (sustainability credentials)  
It appears the Sustainability Credentials of Long Sutton is undervalued and we consider it would be appropriate to increase the proposed 580 dwellings which the emerging Local Plan seeks to be developed in Long Sutton. A figure commensurate with its status as the fourth largest settlement in the draft Local Plan area (after Boston and Spalding and just below Holbeach in terms of population (2011 census) would be 750

## Officer Comment:

The scale of housing growth proposed for Long Sutton took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; population and household projections and the local availability of land at lower risk of flooding. Kirton has a housing requirement figure of 500 and a Sustainability Score of 126; the housing requirement for Long Sutton of 580 dwellings with a Sustainability Score of 171 is therefore broadly comparable.

## Officer Recommendation:

No change required.

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

dwellings representing a percentage increase of 22.72%. This is in line with Kirton which has a very similar Sustainability Credential.

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ID1: 547	comment_author: Savills	
comment_content: We support the proposed allocation of 30 dwellings in Wigtoft in Policy 12. The South East Lincolnshire Strategic Housing Land Availability Assessment (January 2016) for Wigtoft, a supporting document to the draft Local Plan, identifies that sites Wig012 and Wig013 could deliver 32 and 52 dwellings respectively at a density of 30 dwellings per hectare (dph) and 26 and 44 dwellings respectively at a density of 25dph. We therefore requested that the South East Lincolnshire Joint Strategic Planning Committee consider allocating more residential development in Wigtoft in line with potential capacity of sites Wig012 and Wig013. It is evident that land under the ownership of Magdalen College can accommodate all the proposed housing for Wigtoft in Policy 12 over the plan period to 2036.	Officer Comment: The scale of housing growth proposed for Wigtoft took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. The objection does not seek to address any of these issues, and does not set out any substantive arguments to justify the proposed increase.	Officer Recommendation: No change to Wigtoft's housing requirements is necessary.

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ID1:

548

comment\_author: Valerie Newbury

comment content:

As a resident of Moulton Chapel for many years, may I express my concern at the possibility of 150 houses being built in and around the Village. This will bring the size to more than double the original Village turning it into a small town!

The plans may look simple on paper, but in reality will make a significant adverse impact on village life. For example:

The roads in and around the village are inadequate to take a possible extra 150+ cars owing to their width and drainage problems. The fourteen wheel lorries using the weigh bridge in Woodgate Road and massive dangerous farm machinery take the whole width of the roads which at times cause untold damage over grass verges causing flooding.

Moulton Chapel School is not suitable as it is to accommodate an increase in potential children.

Moulton Medical Centre is the nearest doctors five miles away and would find it difficult to absorb large numbers of incomers and is inaccessible by public transport from Moulton Chapel. Thus additional car use.

The Public Transport system is very thin on the ground making it difficult for those without cars accessing doctors, dentist, health care requirements and banking. There is no employment opportunities locally, making the use of the local roads, already in poor condition, further used to travel out of the village.

Yes, there is a need for more housing to accommodate the ever increasing population, but 150 in a small village such as ours are intolerable. In the past we have already accommodated one Estate comprising 70 + houses. We do not need another 150.

Officer Comment:

The village as it currently is resulted from allocations in the 1998 Local Plan. The 2006 Local Plan did not make further allocations. The approach is based on the previous growth the village has accommodated; the facilities it has, which are similar to other minor villages; public transport provision, which scores in the centre of the other settlements; employment, which with six other settlements scores better than all the others for self containment; and flood risk, which is in Flood Zone 1. The Local Plan will be accompanied by an Infrastructure Delivery Plan, which will identify what needs to be improved, by whom and when. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 of the Housing Paper it is considered that the Local Plan should seek to slightly reduce the number of dwellings proposed in Moulton Chapel.

Ⓚwing to these comments it is considered that a change to Moulton Chapel's housing requirements is required and the Local Plan should identify housing allocations in Moulton Chapel for 130 dwellings between April 2011 and 31st March 2036.

Officer Recommendation:

A change to the Policy is recommended

Another aspect to this, more countryside to be covered in concrete thus less land for food production for the coming generations.

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

ID1:

549

comment\_author: Rosina Chattell

comment content:

Total proposed plan for Moulton Chapel: 150 houses could mean approx 100 (or more) children. Local school could not accommodate this increase in pupils - the capacity is already full. Footways are already inadequate and an increase in traffic could present a danger to children and pedestrians making their way to school/bus/work. The Braybrook settlement has already recently increased the number of dwellings in Moulton Chapel putting pressure on all local services. Drainage of surface water has major constraints in many areas of Moulton Chapel and requires much upgrading. Likewise the clean water supply and foul sewerage and water recycling facilities need sympathetic upgrading throughout. Public transport provision is almost non-existent, causing problems accessing GP/health care/dentists, banking, etc, together with connections further afield. Thus making it difficult for villagers to attempt to improve their health and quality of life considerations. P.O. and retail are also minimal in Moulton Chapel and opportunities for local employment almost non-existent. All of the above makes it difficult for residents to manage their day-to-day lives and an increase in housing as proposed would have a significant adverse impact. Of course funding and involvement in infrastructure can be secured through developer contributions but this has not happened successfully in the past. Our Community hall is in existence through the efforts mainly of local people giving their time and effort to the project and this continues. The impact of all the aforementioned on Moulton Chapel would be immeasurable, destroying the rural aspects of this village and creating a small town without suitable amenities and facilities,

Officer Comment:

The village as it currently is resulted from allocations in the 1998 Local Plan. The 2006 Local Plan did not make further allocations. The approach is based on the previous growth the village has accommodated; the facilities it has, which are similar to other minor villages; public transport provision, which scores in the centre of the other settlements; employment, which with six other settlements scores better than all the others for self containment; and flood risk, which is in Flood Zone 1. The Local Plan will be accompanied by an Infrastructure Delivery Plan, which will identify what needs to be improved, by whom and when. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 of the Housing Paper it is considered that the Local Plan should seek to slightly reduce the number of dwellings proposed in Moulton Chapel.   
Øwing to these comments it is considered that a change to Moulton Chapel's housing requirements is required and the Local Plan should identify housing allocations in Moulton Chapel for 130 dwellings between April 2011 and 31st March 2036.

Officer Recommendation:

A change to the Policy is recommended

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

adversely affecting the lives of current residents who greatly value the rural status of Moulton Chapel. Please take the above points into consideration and preserve the integrity of the country life of Moulton Chapel.

ID1: 550 comment\_author: Robert Spenceley

comment\_content:

Long Sutton: Following last night's local meeting it was clear the town does not need 580 units (23.2 per year) as there have only been 46 units in the last 4 years built and sold (11.5 per year) Many of which I built. I can assure you there is no requirement for any more than that per year, we struggled to sell them until investors came along and that market is drying up. Therefore the maximum likely to be required is approx. 290 and you already have planning permission passed for half that.

Officer Comment:

Comments noted. The Local Plan has to assess housing needs over much longer time periods. The completion rate for Long Sutton over the 35 year period to 2011 was about 30 per annum.

More recently 96 homes were completed between 2011-2016 (19.2 per year). Planning permission exists for 160 dwellings, leaving a residual requirement of 324 dwellings. This represents an annual increase (29 per year) over recent completion rates but is almost the long term average. The Council does not have a 5 year supply of housing sites – this requirement can deliver housing in the short term to help address the under-delivery but also to provide sustainable locations for growth over the next 25 years when the economy and housebuilding rate is expected to improve.

Officer Recommendation:

No change in the overall approach to housing provision for Long Sutton is recommended.

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

ID1: 551 comment\_author: Mr N Marshall

## comment content:

As chairman of the parish council and a parish resident for over 60 years, I would like to object to the lack of future development opportunities allocated to the parish of Freiston in the recently published South East Lincolnshire Local Plan. The parish covers a large area with the main housing areas being spread around the village centre, Haltoft End, Scrane End and Freiston Shore and no future development has been allocated to any of these areas. Increasing the number of homes in the parish can only be a benefit, with the area already offering all the amenities new residents would need: The centre of village and Haltoft End is on the main Boston to Skegness bus route. The village has three public houses, a butchers and a general shop with post office. The village has a diverse range of job opportunities at the local farms, at North Sea Camp and at the numerous businesses at the Enterprise Business Park (including the recently opened veterinary centre) The village also has a well maintained playing field (with football, cricket, bowls and children s play area) and large recently renovated community centre which both have huge local support. Funding has also been acquired for adult exercise equipment to be installed on the playing field later in 2016. The village has a vibrant church community, with recent grant funding improving the church grounds, internal facilities and disabled access. As a village we are keen to hold on to all the above amenities and without increasing our population until after 2036 this will be extremely difficult. It seems ludicrous that Fishtoft village has 3 large development areas and it has far more limited amenities (one pub, no shops, no large community centre) and minor job opportunities near the

## Officer Comment:

Freiston has development opportunities within the defined settlement boundary and some opportunities also arise in Haltoft End. Housing needs in the northern parishes of Boston Borough are limited (according to the Boston Borough SHMA) and so the Local Plan makes specific housing site provisions within the most sustainable settlements.

## Officer Recommendation:

No change to the approach on the Spatial Strategy and provision of housing sites within the Other Service Centres and Settlements is proposed.

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

development areas. Wouldn't it be far more sensible to move some of Fishtoft's development opportunities to Freiston village?

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ID1:	552	comment_author:	Robert Doughty Consultancy Ltd
comment_content:	we support the allocation of 300 dwellings in Sutterton and 60 dwellings can be readily provided on the Persimmon Homes East Midlands' land off Monarch's Road in Sutterton.	Officer Comment:	The support is welcomed.
		Officer Recommendation:	No change is needed to Sutterton's housing requirements.

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ID1:

553

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that the target for Holbeach is for 1340 homes across the plan period. We would support an approach in the plan which treated housing targets as a floor and not a ceiling, that is a minimum target and not an upper limit. The policy currently states that allocations will be made to meet the housing numbers promoted in the plan. The plan, however, does not identify the allocations, other than by reference to the Proposals Map. This approach is at odds with the Economic Development Policies, (i.e. Policy 7: Improving South East Lincolnshire's Employment Land Portfolio " which names each site and provides a site specific reference). This approach should be taken in Policy 12, where each site is identified. Given the number of sites this detail could be set out in an appendix to the plan, which could then set out relevant information regarding the development of the site to provide guidance for landowners, developers and the wider community, to provide certainty regarding the scale and scope of development of the site. Our clients are the joint owners of a site to the west of Holbeach, contained by the A17, A151 and Spalding Road (SHLAA reference HOB048), with a maximum capacity for approximately 1000 new homes. A draft scheme has already been prepared for this site, which has been subject to public consultation. This site to the west of Holbeach will form part of a comprehensive and co-ordinated extension to the town, including the new roundabout at the junction of the A151 and A17 and the proposed Food Enterprise Zone. The comprehensive development collectively has clear benefits for the town making best use as it would of planned investment in improvements to the road

Officer Comment:

Support for Hob048, Peppermint Junction improvements and the Food Enterprise Zone are noted. Hob048 would be a strategic development, potentially delivered into the next plan period. To ensure that development takes place in a comprehensive, coordinated manner a policy will be prepared for delivery of the sustainable urban extension.

Officer Recommendation:

Prepare new policy to enable the delivery of Hob048. Hob048 is one of the more suitable Potential Housing Sites in Holbeach and should be taken forward as Preferred Option Housing Allocation.

network, linking the Food Enterprise Zone to the town and allowing for effectively planned investment in utility provision to support both the residential and commercial development. The land to the West of Holbeach also makes sense as a freestanding development, enclosed as it is by major roads to three sides and the existing built form of Holbeach to the east. The site provides excellent opportunity for a development that connects well to the rest of the town in a location that would have limited impact on the landscape setting of the town. We note, however, that South Holland District Council has also indicated that it is minded to approve a proposed development for 900 houses at Manor Farm, to the south of Holbeach (Hob002). Although the delivery of these sites may extend beyond the lifetime of the plan, if both sites are to come forward, they could be constrained by the current target of growth for the town. In order to facilitate the delivery of both sites a target of at least 1800 dwellings should be adopted for Holbeach to take into account the overall capacity of developments in the town. Given the relationship between the housing site, the food enterprise zone and the Peppermint Junction improvement scheme consideration should be given to the formulation of a specific policy, similar to the Policy 13 "A sustainable Urban Extension for Spalding. HOB048 clearly plays a fundamental role in the future of Holbeach specifically, and in its support for the Food Enterprise Zone, the economic growth of South East Lincolnshire more generally and as such must be allocated in the adopted local plan. In summary we object to the target of 1340 for Holbeach as this is too low to accommodate the growth anticipated by the Local Authorities. A target of at least 1800 dwellings, which should be treated as a floor and not a ceiling, would be more appropriate. We also

support the allocation of HOB048 in its entirety as a housing allocation under Policy 12. It may be appropriate, however, to create a new policy, similar in intent to Policy 13, to promote Hob048 as a Sustainable Urban Extension in association with the development of the Food Enterprise Zone to the west of the A151.

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ID1:

554

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that the target for Gosberton is for 230 homes across the plan period. We would support an approach in the plan which treats housing targets as a floor and not a ceiling: that is a minimum target and not an upper limit. Even in that case, however, it will be possible to allocate all sites set out in the current consultation. The policy currently states that allocations will be made to meet the housing numbers promoted in the plan. The plan, however, does not identify the allocations, other than by reference to the Proposals Map. This approach is at odds with the Economic Development Policies, (i.e. Policy 7: Improving South East Lincolnshire's Employment Land Portfolio which names each site and provides a site specific reference). This approach should be taken in Policy 12, where each site is identified. Given the number of sites, this detail could be set out in an appendix to the plan, which could then set out relevant information regarding the development of the site to provide guidance for landowners, developers and the wider community, to provide certainty regarding the scale and scope of development of the site.

The Belchmire Lane site (GOS11) could help deliver a comprehensive package of works, including expansion of the cemetery and open space, in addition to providing new pedestrian links between disparate parts of the settlement and allowing better pedestrian circulation around the settlement. The expansion of the open space would help meet a current undersupply of open space in the settlement identified by the LPAs own analysis, an undersupply which would only worsen with new development. As such we would anticipate that our clients land would form the basis of the

Officer Comment:

The support for Gosberton's proposed housing requirement of 230 dwellings is welcome. We will reconsider housing numbers when we receive updated population data.

Policy 11 says "provision will be made for a net increase of at least..." Therefore, the approach we are taking provides flexibility and are not ceiling figures.

Gos011

1. The Parish Council have been contacted to establish how much burial land they have. The Chairman has advised they are looking for land at the back of the cemetery as they only have enough burial ground for around 18 months. The SHLAA submission also showed the potential to increase the size of the playing field.

2. An alternative SHLAA option, which was rejected as an option for the consultation held in January, was to build on the existing playing field and some other land, provide an extension to the cemetery and replace the open space, where this option seeks to build houses. This alternative option was rejected because of the change in character it would have on the centre of the village and that the replacement open space would be peripheral and more isolated.

3. The Sustainability Appraisal for Gos011 scores it the worst of all six sites that were shown on the inset map for the January consultation, with: 1 positive impact, 5 uncertain impacts, 1 neutral impact and 6 negative impacts. The rejected alternative option scores better with: 1 positive impact, 8 uncertain impacts, 1 neutral impact and 3 negative impacts. The areas of improvements are:

- To make efficient use of South East Lincolnshire's

Officer Recommendation:

Due to these comments it is considered that a change to Gosberton's housing requirements is required and the Local Plan should identify housing allocations in Gosberton for 270 dwellings between April 2011 and 31st March 2036.

housing allocations in Gosberton and request that the site is allocated appropriately.

We note that in assessing each site no account is taken of the necessary cumulative impact of the allocations that would be necessary to deliver 230 new dwellings on the facilities of the settlement, specifically in respect of the identified shortfall in some forms of open space.

transport infrastructure, reduce the need to travel by car, and promote greater accessibility to services, employment, public transport, cycling and walking; oThis is because the rejected alternative is closer to the shops and bus stop than Gos011.

- To promote strong, secure, socially inclusive and cohesive communities for all residents of South East Lincolnshire;

oThis is because the rejected alternative is outside the ideal walking distance of some essential services, rather than the majority and is just within the ideal 7km distance to the nearest employment site, which is Millfield Road in Donington

- To protect the quality and character of landscape and townscape and seek opportunities for enhancement oThis is because the rejected alternative site could have an adverse impact on the character and appearance of the area. Although most of the site is located within the development limits of Gosberton and has a good relationship with the existing built up area, its development would change the open character of this of this part of the village. However, Gos011 would have an adverse impact on the character and appearance of the area. Although the site is located adjacent to the development limits of Gosberton, its size and location means that it would extend the built up area into the countryside to the detriment of the area's character. The impact of both proposals depends on the quality of the design.

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

ID1:

555

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We support the fact that Spalding, together with Boston, has been set the highest level of growth in the South East Lincolnshire area. The town is well placed to accommodate high levels of growth as a catalyst for development across the district.

Officer Comment:

Comments noted

Officer Recommendation:

No change to the Local Plan is recommended

ID1:

556

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

we support the fact that Spalding, together with Boston, has been set the highest level of growth in the South East Lincolnshire area. The town is well placed to accommodate high levels of growth as a catalyst for development across the district. As stated in our comments on Policy 2, however, we consider that the growth targets for Spalding should be merged with those for Pinchbeck and be presented as a single target. The policy currently states that allocations will be made to meet the housing numbers promoted in the plan. The plan, however, does not identify the allocations, other than by reference to the Proposals Map. This approach is at odds with the Economic Development Policies, (i.e. Policy 7: Improving South East Lincolnshire's Employment Land Portfolio " which names each site and provides a site specific reference). Policy 12 should also identify each site, although the weight of numbers might suggest that this information is set out in a separate table or appendices. This approach would include relevant information regarding the development of the site to provide guidance for landowners, developers and the wider community, to provide certainty regarding the scale and scope of development of the site. Our client's land (PIN025) should be included in the list of allocations.

Officer Comment:

Although Pinchbeck is within close proximity of Spalding, it functions as a separate settlement, with its own character and distinctiveness. Its role and function, as well as the level of services available is comparable to the other Main Service Centres. Pinchbeck does not therefore have the same characteristics as other Spalding suburbs. As such it would not be appropriate to merge the housing requirement for Pinchbeck with Spalding, solely because of its location.

Officer Recommendation:

It is not considered that the comments made by consultees justify a change to Pinchbeck's housing requirements. However, a slight increase in the housing requirement is considered necessary, based upon the availability of a range of small and medium sized sites in Pinchbeck, with the potential to deliver a good mix of housing in the early part of the plan period. Consequently, it is considered that a change to Pinchbeck's housing requirement should be made, and that the Local Plan should provide for 240 dwellings between 1st April 2011 and 31st March 2036.

ID1:

557

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that the target for Pinchbeck is for 190 homes across the plan period. In response to the relationship to Spalding and how this relationship will grow over the plan period, we would request that the target for Pinchbeck is reviewed in light of the relationship to the larger neighbour and its high scoring on the Sustainability of Settlements review (where Pinchbeck has the fourth best score outside Spalding and Boston, and a higher growth figure be directed to Pinchbeck). If the decision is taken to treat Pinchbeck and Spalding as, in effect a single development area the housing targets for the two settlements would need to be merged into a single target. Clearly all the sites promoted in Pinchbeck will not need to be allocated in order to reach the target of 190 dwellings. We would challenge the development rates used in site assessments, which assumes that larger sites will come forward at a rate of 50 dwellings per year. Recent experience would suggest that development rates will lie near the 30 per year. Policy 12, as the mechanism for allocating housing sites, should include a list of sites and set out the specific key opportunities and constraints regarding the development of each site. Given the number of sites this could take the form of an appendix to the Local Plan.

Officer Comment:

A slight increase in the housing requirement is considered necessary, based upon the availability of a range of small and medium sized sites in Pinchbeck, with the potential to deliver a good mix of housing in the early part of the plan period. Consequently, it is considered that a change to Pinchbeck's housing requirement should be made, and that the Local Plan should provide for 240 dwellings between 1st April 2011 and 31st March 2036.

The supporting text will list the Allocated Sites and the constraints are addressed in the SHLAA

Officer Recommendation:

Increase the housing allocation to 240.

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

ID1:

558

comment\_author:

Mr & Mrs Antony Barnes & Collee

comment content:

We feel the proposed housing numbers are too many for Long Sutton.

Officer Comment:

Comments noted

Comments noted. The Local Plan has to assess housing needs over a long time period. The completion rate for Long Sutton over the 35 year period to 2011 was about 30 per annum. The proposals for Long Sutton are of a similar rate of growth.

Officer Recommendation:

No change in the general approach to apportioning housing development in Long Sutton is recommended.

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

ID1: 559 comment\_author: Weston Parish Council

comment content:

The potential impact of the proposals - contained within the South East Lincs. Local Plan 2011-2036 - Draft for Public Consultation - as they relate to the Parish of Weston were considered at a recent meeting. The Parish Council considered the sheer quantity of land in and around the village of Weston, that has been identified for possible housing developments, as staggering. Even allowing that all the land identified will not actually be developed the possible addition of over 200 new dwellings to relatively small rural village would have a major - detrimental - impact. There is no mention of improving infrastructure in the local area to cope with additional housing - the Parish Council have recently made objections to a proposed development of 45 dwellings on Small Drove on the basis that local infrastructure will not be able to cope - the schools, the roads, the Doctor's surgery but first and foremost the local sewage system. All of the above concerns are multiplied exponentially by the proposals put forward in the Plan no matter which of the proposed sites might be developed.

Officer Comment:

The Local Plan will be supported by an Infrastructure delivery Plan which will demonstrate how arising infrastructure needs will be met.

Officer Recommendation:

No change to the approach is required.

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

ID1: 560 comment\_author: Derek Smith

comment content:

I strongly support the proposed plan for Long Sutton, however, I would suggest that development is favoured in relatively small plots so they might organically blend in with the town, rather than large isolated estates such as the Woodlands development which create a character of their own instead of gently integrating.

Officer Comment:

Comments noted

The consideration of sites is largely triggered by land owners who put forward sites for assessment. Small scale development (e.g. infill plots or sites under 10 units) may come forward but, in general, such sites are few and far between and difficult to assess as landowners do not generally promote them.

Small and larger scale housing sites are required to ensure that a mix of house types and tenures can be delivered across the plan period. This will also cater for demand from national and local housebuilders and for self build. It should be possible through good design to ensure that new housing sites (small or large) can complement the character of Long Sutton and integrate with the existing built form.

Officer Recommendation:

No change to the Local Plan is recommended.

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

ID1: 561 comment\_author: Mrs J Wilson

## comment content:

I am writing with my concerns over the proposed housing development on the field between Eastwood Rd and Blackthorn Lane Boston titled Fis001. We purchased our house on Eastwood Road as we liked the idea of fields behind, and not to be over looked by houses. My concerns are not only to be overlooked by others but how the development will affect the environment and safety of others. The proposed road way on to the development for the 224 houses off Lindis road would be extremely dangerous, at either end of Lindis Rd the 2 junctions at Eastwood Rd/Freiston Rd and Tower Rd/Freiston Rd are crossroads and are not the safest due to them having restricted views and it would only be a matter of time before someone will be seriously hurt or worse as these junctions would not be able to Cope with the additional volume of traffic. There is also no proposed recreational ground or schools for the additional volume if children that this development would bring. The developments on Mill Rd Boston and Toot Lane Boston would be more than enough additional properties for this end of town and have a safer route to and from their locations, also the traffic from the Freiston Rd end and Tower Rd is already at a high volume getting in to or across town and this would just add to the congestion.

## Officer Comment:

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

Highway issues - The Highway Authority comments that ....

Amenities for children - The provision of new open space would be required as part of the development of the site

Infrastructure - The Local Plan will need to demonstrate how arising infrastructure needs will be met, and these matters will be dealt with in later versions of the document and the Infrastructure Delivery Plan that will accompany it

## Officer Recommendation:

Site Fis001 should be taken forward as a Preferred Housing Site.

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

ID1: 562 comment\_author: Mr John Stuart Birkett

comment content:

The employment and services at Old Leake could justify a higher level of development. Old Leake is unusual in having secondary education in a village context and there is employment and other services. Development here could help to support other villages to the north and east of Boston.

Officer Comment:

The scale of housing growth proposed for Old Leake took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credential (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. Whilst it is correct that Old Leake offers secondary education and limited employment opportunities (as well as some other services) its 'Sustainability of Settlement' score does not suggest that it performs a significant service role, or that it would be appropriate to increase its housing requirements

Officer Recommendation:

No change to Old Leake's housing requirement is necessary.

ID1: 563 comment\_author: Hix & son

comment content:

have submitted 3 sites in Gedney Dyke for housing: 1 frontage development to the west of Orchard End. 2 frontage development on Main road opposite Anvil Close. 3 frontage development on the north side of Roman Bank opposite existing frontage development, extending upto the bend in the road. This is an implied objection to the position of the settlement boundary for Gedney Dyke, which excludes the sites, and the position of Gedney Dyke in the Settlement Hierarchy and the consequent approach for development in Gedney Dyke

Officer Comment:

Gedney Dyke is a small settlement with a low sustainability of settlement assessment score that is comparable with other settlements in the Other Service Centres and Settlements category.

Taken individually or in combination all three sites put forward provide significant extensions to the settlement either in a linear form or development in depth. The only rationale put forward is that the sites are available.

The changes to the settlement boundary sought, as either singular or the combination of sites, would substantially change the character of the settlement. There is no evidence for the re-categorization to Minor Service Centre.

Officer Recommendation:

No change to the Policy is recommended

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

ID1: 564 comment\_author: Hix & son

comment content:

have submitted a site in Holbeach St Johns for housing. It is on the east side of Ravens Bank opposite existing development. This is an implied objection to the position of the settlement boundary for Holbeach St Johns, which excludes the sites, and the position of Holbeach St Johns in the Settlement Hierarchy and the consequent approach for development in Holbeach St Johns.

Officer Comment:

Holbeach St John's is a small settlement with a low sustainability of settlement assessment score that is comparable with other settlements in the Other Service Centres and Settlements category.

The only rationale put forward is that the site is available.

The change to the settlement boundary is not justified with the exception that the site is opposite existing development. There are other such sites with the same limited justification and could be brought forward elsewhere in the settlement. There is no evidence for the re-categorization to Minor Service Centre.

Officer Recommendation:

No change to the Policy is recommended

ID1: 565 comment\_author: Mrs Penelope Jane Fountain

comment content:

I would like to make it clear that I think 300 new houses would make the village of Sutterton into a completely unattractive village, especially if a great number were built on one site. The visual impact would be to overcome the few remaining houses that have character; the facilities (doctor, school, etc) are already at bursting point; and it is impossible to integrate so many newcomers if the buildings are all occupied at much the same time. Sutterton residents remain a friendly and supportive village population, and I would like to recommend that it stays that way.

Officer Comment:

It is not accepted that the development of 300 dwellings in Sutterton would inevitably harm the village's character – much depends upon the sites selected, and the sensitivity of the schemes for their eventual development. The housing requirement is for a 25 year period, and amounts to an average of 12 per year – it is considered that the village can accommodate this pace of growth without harm to its community cohesion. The Local Plan will have to demonstrate how arising infrastructure needs will be met.

Officer Recommendation:

No change is needed to Sutterton's housing requirements.

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

ID1: 566 comment\_author: Derek Tansley

comment\_content:

Policy 12 02 Proposal to build 4000 homes on land adjacent to Vernatts Drain will overload existing infrastructure and will in effect make Pinchbeck part of Spalding. This is contrary to previous promises.

Officer Comment:

The allocation of land resulting in the virtual coalescence of the two settlements is regarded as an inevitable consequence of priority being given by the Joint Strategic Planning Committee to securing the funding and delivery of the first phase of the Northern section of the SWRR (i.e. the roundabout junction with the Spalding Road)

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension in the Draft Publication version of the Local Plan is approved.

ID1: 567 comment\_author: Marilyn Tansley

comment\_content:

Policy 12, Pin 02 Land adjacent to the Pinchbeck side of Vernatts Drain. 400 homes seems an unsustainable development. Pinchbeck will be part of Spalding, which is not what we have been previously informed of.

Officer Comment:

The need to develop the majority of the 'gap' between Spalding and Pinchbeck results from priority being given by the Joint Strategic Planning Committee to development which will assist the delivery of the Northern section of the Spalding Western Relief Road (SWRR).  
An infrastructure delivery plan has been prepared in support of the emerging proposals which seeks to address the physical and community infrastructure needs generated by the additional housing.

Officer Recommendation:

No change is made to the emerging proposals to develop land between Spalding and Pinchbeck for housing.

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

ID1: 568 comment\_author: Mr & Mrs R Hamilton

## comment content:

The settlement of Swineshead Bridge should be included within the Minor Service Centres, group C, in recognition of the nuclear nature of the existing settlement, the facilities and communication links available, and the contribution which site SwiO14 can make to the settlement. In further support of our comments on the Consultation Draft Plan, we should like to draw your attention to the following matters, which support our views. (1). Some years ago, probably 2006, we took a petition around Swineshead Bridge to get enough signatures in favour of Swineshead Bridge becoming part of Swineshead village. This enabled the village to be big enough to be included in the five largest villages that were up for development. Everyone signed except for one household who were away at the time. This showed that we didn't want to become a forgotten hamlet. You may have a record of this petition. (2). We now have a group who are developing the 40 foot drain as a through way for a canal loop. This project is now very advanced and the waterway is within 250m of our house. There is a big move to make Lincolnshire a centre for leisure with the planting of woods, nature trails, walk ways etc. all within the Boston area. All this work progresses through Swineshead Bridge and this could become a beauty spot attractive to residents and boating visitors. (3). We want to keep this community and area alive as it used to be, and prevent it falling into decline like East Heckington, the small hamlet a few miles along the road which, when part of Heckington was a thriving area with a church, shop, school etc. Without allowing for some further development this is what will happen to Swineshead Bridge. (4). This is on a personal note and

## Officer Comment:

Swineshead Bridge is a stand alone settlement separated from Swineshead. Development opportunities are available within the settlement boundary. It is also the case that an extant planning permission has been available for the development of 35 houses since 2008. With additional opportunities on the Objector's submitted site Swineshead Bridge has the potential for significant growth especially when compared to its current extent and population.

## Officer Recommendation:

No change to the Policy is recommended.

may not be appropriate, but we were recently refused permission for a dwelling for our son and his family who works locally at Swineshead Bridge. He has had to take up a house in Swineshead village, which could have been built here. Similarly an elderly family member who wished to live close to us here in Swineshead Bridge has had to go to live in the village, as permission would not be granted on land here. These are both real examples of lost opportunities for local housing need and which could help sustain Swineshead Bridge as a settlement. Inclusion of SwiO14 as a Minor Service Centre (Policy 12, Distribution of New Housing, group C) would provide for such cases without any material planning objections. It would also help the sustainability of the settlement.

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ID1:

569

comment\_author:

Hume Planning Consultancy Ltd

comment content:

Broadgate are of the opinion that greater flexibility that what is currently proposed should apply to the rural villages for reasons that arise from the findings of the Taylor Review and the need to provide a greater level of affordable housing in the villages. The lifespan of the Plan is such that development may extend beyond 2036. In order therefore to significantly boost the supply of housing during the earlier part of the Plan period, the overall dwelling requirement should be expressed as a minimum. To bring affordable housing on stream in what is primarily a rural area, where the majority of households reside and where affordable housing need is greatest, requires a greater range of smaller sites outside the Sub Regional Centres to be allocated than currently identified in the Plan. The Government's emerging initiative to classify low cost market housing as affordable, means that market housing led schemes in the villages, i.e. Beyond the second tier Main Service Centres, are necessary. One consideration when identifying objectively assessed housing need, is ensuring the right level of jobs is sustained by the appropriate level of housing provision. The Framework at paragraph 28, requires Planning Policies to support growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. Under Policy 7 of the Plan, Freiston is regarded as an employment centre and so should have a wider level of housing than currently proposed to support it.

Officer Comment:

Comments noted.  
Additional sites are being considered subsequent to this consultation and the "preferred sites" consultation. However, in general a large range of sites in a significant number of settlements is proposed. It is also necessary through the Local Plan to support development in the most sustainable locations, support the provision of strategic infrastructure and provide certainty on the delivery of development.

Officer Recommendation:

Consider the OAN based upon the 2014 Household projections and whether any changes to the plan are required in meeting housing needs.

ID1:

570

comment\_author: Mr & Mrs Rylott

comment content:

Policy 12 page 40 All development for new housing is restricted to existing settlements as defined by the local plan. This is in order to preserve the countryside. However, many settlements are not defined by the local plan and some settlements such as Algarkirk are not correctly mapped - excluding areas along Pitcher Row Lane/A17 which includes a number of houses and a public house/café (currently for sale). The local Plan ignores more dispersed settlements or any that are not in a 'nucleated' form. This leaves those residents at a disadvantage in terms of the plan's provisions on a number of policy areas and prevents the 'natural' expansion/development in these areas. The Council should carefully review what it considers as settlement and what is open countryside.

Officer Comment:

All settlements, including the largest (e.g. Boston and Spalding) have outlying areas where the "developed" form can be seen to change to the countryside or more open, generally undeveloped areas.

There will always be differences in interpretation with regard to where the developed and undeveloped characteristics change, especially so where the settlement may be small, the pattern of development, generally more sporadic, and where other associations might be attached.

Many will associate the settlement boundary as providing a degree of certainty with regard where certain forms of development will be contained. Although it is assumed that the Objector sees the settlement hierarchy and development boundary as a handicap it is unclear what "natural" expansion/development means and how it can be assessed.

The Rural Exceptions Site policy will allow development outside but adjoining settlement boundaries where a specific need for that settlement can be provided.

Officer Recommendation:

No change to the Policy is recommended.

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

ID1:

571

comment\_author: Savills

comment content:

object to the proposed allocation of 180 dwellings in Sutton Bridge and believe that this figure should be increased. Policy 2 Spatial Strategy categorises Sutton Bridge as a Main Service Centre and this is supported. Policy 2 states that Sub-Regional Centres and Main Service Centres are Areas where development is to be directed and that Minor Service Centres are Areas of limited development opportunity. It is therefore unclear in Policy 12 why there are 4 settlements, that are categorised as Minor Service Centres, which have a higher amount of residential development proposed than Sutton Bridge. The South East Lincolnshire Strategic Housing Land Availability Assessment (January 2016) for Sutton Bridge, a supporting document to the draft Local Plan, identifies that the proposed housing sites Sub013 and Sub016 could deliver 270 and 93 dwellings respectively at a density of 30 dwellings per hectare (dph) and 225 and 78 dwellings respectively at a density of 25dph. In light of the South East Lincolnshire Joint Strategic Planning Committee's own evidence base, the proposed housing sites Sub013 and Sub016 could therefore deliver 363 dwellings at 30dph or 303 dwellings at 25dph. As previously mentioned the landowner is supportive of residential development at sites Sub013 and Sub016 and we therefore request that the proposed 180 dwellings for Sutton Bridge to be significantly revised upwards. The landowner is supportive of all the proposed dwellings for Sutton Bridge to be located on sites Sub013 and Sub016. Also note that the land to the South of site Sub013 (up to the A17) is under the ownership of the Henry Smith Charity and this land could also accommodate residential development post 2036.

Officer Comment:

It is not considered that the comments made by consultees justify a change to Sutton Bridge's housing requirements. However a slight increase in the housing requirement is considered necessary to deliver a better form of flood resilient development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Consequently it is considered that a change to Sutton Bridge's housing requirement should be made, and that the Local Plan should provide for 210 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the housing allocation to 210.

ID1:

572

comment\_author: Savills

comment\_content:

Policy 12 seeks to deliver 1,340 new dwellings in Holbeach over the plan period. We consider that this should be increased to take account of previous under delivery and to help meet housing needs and economic aspirations. Between April 2011 and March 2015, only 68 new homes have been delivered in Holbeach. It is therefore essential that sites which are available now, and can be delivered in the next 1-5 years, are identified and permitted to come forward for residential development. It is noted that a number of sites allocated in Holbeach will not come forward for development until later in the plan period and some sites could take up to 15 years to complete. Furthermore, land allocated to the north west of the settlement is in numerous ownerships and this, in our experience, could result in delays to the delivery of the site. Our clients sites to the south of the settlement, Land off Barrington Gate (Site Hob051) and Land off Branches Lanes (Site Hob052) are both within the sole ownership of our client and do not rely on the delivery of other sites coming forward. They can be delivered in the next 1-5 years and should, in our view, be allocated for development. As set out in our response to Policy 2, it is important sufficient sites are allocated in Holbeach to meet the areas housing and economic needs. Two strategic employment sites are allocated in the settlement, and it is essential housing is delivered to support their growth. It is anticipated that the Holbeach Food Enterprise Zone will attract skilled workers to the area, and high quality houses will therefore need to be provided.

Officer Comment:

Hob051 is within a single ownership and can be delivered on its own within the next 1-5 years. However the Local Plan is in year 6 so delivery would need to be in years 6-10. The SHLAA identifies that 'the site has a scrapyard to the south. Environmental Health identify that the site is on a list of potentially contaminated sites requiring further investigation. There have been complaints about the operation of the scrapyard and so it is considered that residential use is not appropriate.' The SHDC's Environmental Health Service will need to be satisfied that any contamination can be mitigated. As a contaminated land survey has not been undertaken, it is not accepted that the site would be acceptable for housing. The Highways Authority identifies that 'Hob052 Branches Lane would require widening, strengthening, surface water drainage, footways and street lighting to make it suitable to serve the site', so although it is accepted that access could be taken from Branches Lane, it does not appear that a satisfactory access solution would be straightforward. Although there is residential development to the north and a row of properties to the east of Branches Lane, Hob052 would alter the open countryside character of this location so should not be taken forward.

Officer Recommendation:

Hob051 and Hob052 are not some of the more suitable Potential Housing Sites in Holbeach and should not be taken forward as Preferred Option Housing Allocations.

ID1:

573

comment\_author: Fisher German LLP

comment content:

It is noted that at this stage in preparing the Local Plan, various for housing sites have been identified to deliver the housing The allocation of 380 dwellings in the Main Service Centre of Donington is supported and considered appropriate given the range of services and facilities that are available in the settlement. These include (but are not limited to), a Secondary School, Primary School, two Food Stores, Public House and a Community Centre. It is considered that Site Don008' (Land off Malting Lane) as shown on Inset Map 4 for Donington represents a sustainable and suitable location for new residential development and should be allocated as a housing site for Donington within the emerging South East Lincolnshire Local Plan. Detailed consideration has already been given to this site within the January 2016 South East Lincolnshire Strategic Housing Land Availability Assessment (SHLAA). This concludes that the site is available, achievable and suitable for residential development. Regarding availability, as stated within the SHLAA assessment there are no known legal or ownership constraints to development on the site. Furthermore, at the current time a planning application for a residential development of 73 dwellings on the site is being prepared, therefore the site should continue to be considered as available by the Council. As recognised within the SHLAA assessment, development on the site is achievable, and given the forthcoming planning application should be considered as being able to deliver development within five years (rather than the 11-15 years stated within the assessment). Furthermore, it is significant to note that the development proposed by the current planning

Officer Comment:

Support for the Donington housing target is welcome. Support for Don008 is welcome. The comments made relating to the SHLAA are not disputed. A planning application is pending consideration by SHDC. The SHLAA identifies the site as being deliverable from years 6-10 which reflects the owners intentions. The ability of the scheme to provide for 30% affordable housing is noted. The outcome of the Phase 1 Habitat Survey and Protected Species Surveys are noted and the biodiversity enhancements proposed are welcome. The SHLAA identifies that the site 'will not change the built up character and appearance of the area.' Provision of open space and children's play within the scheme is noted. The proximity of Don008 to bus services is accepted, as is its proximity to local shops and services. The outcome of the noise assessment and any mitigation proposed should be discussed and agreed with SHDC's Environmental Health. Any highways matters should be agreed through the planning application process with the Local Highways Authority.

Officer Recommendation:

Site Don008 is one of the more suitable Potential Housing Sites in Donington, and it should be taken forward as Preferred Option Housing Allocation.

application proposes the inclusion of 30% affordable housing, in accordance with the latest evidence on housing need. Regarding the suitability of the site, the SHLAA assessment states that "The site is in scale with the 380 dwellings which the emerging Local Plan seeks to be developed in Donington". The site will not have any adverse impact on natural, built or historic assets and as confirmed by the SHLAA, development will not negatively impact the built up character and appearance of the surrounding area. A Phase 1 Habitat Survey prepared for this site confirms that the majority of the site is arable farmland and therefore of low biodiversity value. Existing ditches to the north and south western boundary of the site are identified as being of higher biodiversity value. These features will be retained with suitable buffer zones as part of any future development. Great Crested Newt Surveys were undertaken and none were found in the ditches in proximity of the site. As a biodiversity enhancement, the proposed development incorporates a Wildlife Pond as part of the Sustainable Drainage System. WaterVole Surveys have also been undertaken on the site. None were observed. The site is bounded to the north by existing dwellings on Cowley Road and by dwellings on Malting Lane to the east. A new residential development is currently under construction on land to the south east of the site. Turners (Soham) Haulage Business is located to the south western boundary of the site. It is therefore considered that this site is a logical location for a residential development/small urban extension, as it is surrounded on all sides by existing development. The Illustrative Masterplan prepared in support of the outline planning application demonstrates that the site can deliver an enhancement to existing infrastructure in the form of a high quality public open space (including children's play area). As

outlined in the SHLAA, development of the site will not lead to the loss of, nor place undue burdens on, existing infrastructure, such as open space, green infrastructure or community facilities". Furthermore, the location of the site is described as being accessible to existing services and facilities in Donington, and adjacent to the existing built-up area of the village. It is noted that the site is in good walking distance to the village and will provide a development that accords with national and local planning guidance by making efficient use of existing services and by offering an inclusive and mixed community as advocated by paragraph 50 of the NPPF. Planned growth of a settlement is the most sustainable form of development as it allows for well planned infrastructure, and access to a range of facilities. This form of development balances and integrates the social, economic and environmental needs of the local community. We also suggest that such extensions to a village/settlement represent an efficient and effective means of sustainably meeting housing targets, and this pattern of organic growth or gradual expansion is the historic means by which almost all towns and villages in England have grown. The nearest bus stops are located on Station Street approximately 500 metres northeast of the site, these are served by the K59 service which connects the site to Boston, Bicker and Spalding. The centre of Donington is located approximately 850m to the northeast of the site. A footway along the eastern edge of Matting Lane continues along Station Street towards the centre of Donington providing a link to the centre of the village. In addition, the Donington Cowley Endowed Primary School is located approximately 650m northeast of the site on Towndam Lane. Regarding site characteristics the SHLAA states that The site is close to a distribution site which will impact

on the residential amenities of this site. Although some of the site will be no more impacted than the E & S Forklifts site, which has planning permission, the boundary would need to be protected in some way, such as an earth bund. A Noise Assessment has been undertaken to assess the noise impact that the neighbouring Haulage Yard has on the site. In order to reduce the impact on the residential amenity of the site it is recommended that the proposed dwellings adjacent to the Haulage Yard are orientated so that they provide an added acoustic barrier between the Haulage Yard and the gardens of the proposed dwellings. Furthermore, the report recommends that 2.5m acoustic fences are built around the gardens of the dwellings facing the Haulage Yard; and that these dwellings are fitted with standard thermal glazing and acoustic vents. The Noise Assessment concludes that with these measures the provision of an earth bund/fence along the southwestern boundary of the site will not be necessary, and that these measures are sufficient to protect both the amenity of the future residents and the operation of the existing business. The SHLAA assessment recognises that services and facilities are accessible on foot and by bicycle. It also confirms that vehicular access onto Malting Lane is acceptable. A Transport Assessment has been prepared to support the outline planning application for this site. This has evaluated the traffic and transport implications of the proposed development. Access in the form of a priority controlled T-Junction off Malting Lane (with a 5.5m wide carriageway and a 3m wide combined cycleway/footway) has been agreed with the local Highway Authority. As such, it is considered that this site is a suitable location for development that does not have any unsurmountable constraints that would prevent development. It is therefore requested that

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

this site Don008 is identified as a formal Housing allocation within Policy 12 of the emerging South East Lincolnshire Local Plan.

<b>ID1:</b>	574	<b>comment_author:</b>	Robert Doughty Consultancy Ltd
<b>comment_content:</b>	80 units are planned to be allocated across the plan period for Cowbit. The continued growth of the settlement is supported, however, it is considered that there are better opportunities for growth in addition to the sites identified in the draft Inset Plan and that a residual of 21 units gives little scope for growth across the plan period.	<b>Officer Comment:</b>	The support for Cowbit's proposed housing requirement of 80 dwellings is welcome; However, a slight increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Owing to these comments it is considered that a change to Cowbit's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036.
		<b>Officer Recommendation:</b>	A change to the Policy is recommended.

<b>ID1:</b>	575	<b>comment_author:</b>	Historic England
<b>comment_content:</b>	Historic England has concern regarding specific site allocations which are described later within this letter. Paragraph 5.2.10 comments that there are no known constraints to prevent development taking place, although commenting that mitigation may be required in relation to the Historic Environment. Historic England strongly disagrees with this statement; the Historic Environment is a significant constraint for potential housing sites as described below.	<b>Officer Comment:</b>	In the process of housing site selection the proximity and status of historic assets has been a primary consideration. It is inevitable that some sites are in the proximity of heritage assets and designations or the views of said assets might be a consideration. Paragraph 5.2.10 asserts that such considerations do not necessarily prevent development taking place. It is considered that this approach is consistent with national policy and legislation.
		<b>Officer Recommendation:</b>	No change to the approach is recommended.

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

ID1: 576 comment\_author: Mr K L J Vines

## comment content:

Housing requirement The emerging Local Plan seeks the development of approximately 300 dwellings at Sutterton between 2011 and 2036. I disagree with Sutterton's allocation as it seems far too high in comparison with neighbouring villages which have far better infrastructure and facilities and only marginally higher housing allocations, see below. I am aware that another Sutterton resident, Norma Grove, has submitted comments regarding the scores allocated to Sutterton, and I fully support her findings. I would strongly suggest that the allocation for Sutterton be re-visited, particularly in light of the facilities that we have lost in the last couple of years (both pubs and one of the village shops). Village, Housing requirement, Current facilities Sutteron 300 1 village shop/ post office, 1 hairdressers, 1 i-gh shop, Pre-school nursery, Primary School, Village hall (shared school hall), Doctors Surgery Swineshead 400 2 Pubs, Post office, Fish shop, Village shop, 2 retail shops, Bakery, Hairdressers, Chemist, Farm shop, Caf  , Village hall, Church hall, Art gallery, Garage, 2 Car sale showrooms, Pre-school nursery, Primary school, Doctors Surger, Donington 380 Pub, Village shop, Co-op supermarket, Fire station, Mixed business/retail, Retail shops, Bakers, Butchers, Bank, 2 Hairdressers, Beauty salon, Post office, Clothes shop, Library, 2 Florists, Car sales/repairs/MOT, Opticians, 2 Fish shops/restaurant, 2 Takeaways, Caf  , Chemist, Primary school, Secondary school, Village hall, Community centre, British Legion hall, Christian fellowship centre.

Housing Completions It is stated in your literature that there have been only 3 homes built in Sutterton

## Officer Comment:

The Local Plan will have to demonstrate how arising infrastructure needs will be met.

It is accepted that the residual housing calculations set out in the January 2106 Housing Paper for Sutterton are now out-of-date, and a new calculation based upon the situation as at 31st March 2016 will be set out.

## Officer Recommendation:

No change is needed to Sutterton's housing requirements

between 1 April 2011 and 31 March 2015. I can think of as least 23, see below: Planning ref , Description  
B/11/0182 | 2 no semi-detached dwellings, Love Lane  
B/11/0348 | 20 no dwellings, Greenacre Nursery  
B/11/0336 | 1 no bungalow, The Old Inn, Wigtoft Road  
Housing Commitments It is stated in your literature that there are planning permissions outstanding for the construction of 19 dwellings in Sutterton. This figure is now out of date and should be 47 dwellings, see below: Planning ref, Description B/15/0084 21 residential dwellings, Sutterton garage and adjacent land (site partially cleared) B/15/0219 9 no dwellings, Beridge Arms (currently under construction) B/15/0347 4 no semi-detached dwellings, Greenacre Close (currently under construction) B/15/0336 10 no dwellings, Water Tower site (clearance work has begun on site) B/15/0498 3 no residential dwellings, Sutterton Caravan and Camping (site cleared) Residual requirement Therefore, the residual requirement, based on your original allocation of 300, is 230. If the original allocation is re-visited and found to be too high, as suggested above, and is reduced to a more realistic figure, then obviously the residual figure of 230 will reduce accordingly. This is somewhat lower than the figure of 278 quoted in your literature, which needs updating.

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

ID1: 577 comment\_author: Mouchel Consulting

comment content:

Our client Lincolnshire County Council supports the general principles of the emerging South East Lincolnshire Local Plan (the Local Plan). However, we consider that the sites listed below and, detailed on the attached location plans, should be considered appropriate for inclusion as sites for residential development. These sites are:-  
 Holding 102 L: Angle Farm (Tydd St Mary)  
 Holding 127 Y: Clifton's Land (Long Sutton)  
 Holding 141 C: East Reach and Chapel Farms (Deeping St Nicholas)  
 Holding 155 D: Garnsgate Hall Farm ( Long Sutton)  
 Holding 157 B: Gate Farm (Weston Hills)  
 Holding 233 B: Seymour's Land (Saracen's Head)  
 In relation to any of the sites which are within Flood Zone 2 or 3. National Planning Policy Framework and its associated Planning Practice guidance, along with proposed Policies 4 Strategic Approach to Flood Risk and proposed Policy 28 Climate Change and Renewable and Low Carbon Energy, of the Local Plan, address development in flood zones. These policies allows for residential development to take place in Flood Zone 3, subject to its compliance with the required Sequential and Exception Tests. All of the sites are in the single ownership of Lincolnshire County Council, which makes them more attractive to potential developers, thereby improving their deliverability status. The development of these sites could also provide a significant provision of affordable homes in accordance with the requirements of proposed Policy 15: Affordable Housing and developer contribution in accordance with proposed Policy 6: Developer Contributions. With regard to the site identified as

Officer Comment:

Holding 102 L: Angle Farm (Tydd St Mary)  
 This has been registered as Tyd015 in the SHLAA. The Strategic Housing Land Availability Assessment identifies this site as undevelopable because it would have adverse environmental impacts and transport issues (if considered in isolation).  
  
 Holding 127 Y: Clifton's Land (Long Sutton)  
 This is registered as Ged034 in the SHLAA, which concludes that the site is unsuitable, due to conflict with the emerging Plan's locational strategy, adverse environmental impacts, and poor location.  
  
 Holding 141 C: East Reach and Chapel Farms (Deeping St Nicholas) These have been registered as Dsn014, Dsn015 and Dsn016 in the SHLAA and have not been selected owing to adverse environmental impacts, poor location, and transport issues.  
  
 Holding 155 D: Garnsgate Hall Farm (Long Sutton)  
 The Highways Authority identifies that 'the development of Los004, requires Lutton Garnsgate to be provided with a footway, surface water drainage and street lighting. This would be expensive and would significantly alter the character of the road. Residential development would materially increase turning movements at the Lutton Garnsgate/A17 junction. Traffic on the A17 is fast and free-flowing at this point and the straightness and long forward visibility provides a relatively rare overtaking opportunity. There are unprotected ghost island right turn lanes on the A17 to provide refuge for vehicles turning right into Lutton Garnsgate. The left, then right, configuration of the junction means vehicles

Officer Recommendation:

Tydd St Mary  
 No change to the approach is required.  
  
 Long Sutton  
 Ged034. The site should not be taken forward as a Preferred Option Housing Allocation.  
  
 Deeping St Nicholas  
 No change to the approach is required.  
  
 Long Sutton  
 Los004 is not one of the more suitable Potential Housing Sites in Long Sutton and should not be taken forward as a Preferred Option Housing Allocation.  
  
 Weston Hills  
 No change to the approach is required.  
  
 Saracen's Head  
 No change to the approach is required.

Angle Farm this site, which is well related to the existing settlement of Tydd St Marys, is considered to be an appropriate extension of the built area and should be considered as a potential housing site.

queuing to turn right one way would back up against vehicles waiting to turn right the other way. Any intensification of movements at this junction is likely to significantly increase the risk of vehicle conflicts at this junction and the Local Highways Authority does not recommend the inclusion of these sites as suitable for residential development'.

Holding 157 B: Gate Farm (Weston Hills)

The emerging policy for Weston Hills is to allow infill development only. New allocations will not be made.

Holding 233 B: Seymour's Land (Saracen's Head)

The emerging policy for Saracen's Head is to allow infill development only. New allocations will not be made.

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ID1: 578 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 190 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 250 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should be considered flexible in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement, than the current Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA. An over allocation of sites for housing is recommended. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the larger villages like Pinchbeck with its very good existing level of village services.

Officer Comment:

A change to Pinchbeck's housing requirements. However, a slight increase in the housing requirement is considered necessary, based upon the availability of a range of small and medium sized sites in Pinchbeck, with the potential to deliver a good mix of housing in the early part of the plan period. Consequently, it is considered that a change to Pinchbeck's housing requirement should be made, and that the Local Plan should provide for 240 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Pinchbeck housing allocation to 240

ID1: 579 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 230 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 300 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should be considered flexible in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement, than the current Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA.

We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Weston with its very good existing level of village services.

Officer Comment:

The support for Weston's proposed housing requirement of 150 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Due to these comments it is considered that a change to Weston's housing requirements is required and the Local Plan should identify housing allocations in Weston for 310 dwellings between April 2011 and 31st March 2036.

ID1: 580 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 380 new housing site allocations for this market town, in the plan period 2011-2036, (reduced from 500 to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the town than the previous Preferred options document , the numbers of new housing allocations should be flexible, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement above the level that the existing Objectively assessed Housing need (OAHN) figures show, when further studies are carried out. We suggest an over allocation, rather than an under allocation be allowed for. We wish to highlight the current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants. We consider this will, over time, lead to distribution out from the Sub regional centres to the larger towns/village settlements, and therefore housing allocation number increases could be required for Crowland with its existing very good level of facilities and services.

Officer Comment:

A slight increase in the housing requirement is considered necessary to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Consequently it is considered that a change to Crowland’s housing requirements should be made, and that the Local Plan should provide for 500 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the housing allocation to 500

ID1: 581 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 380 new housing site allocations for this market town, in the plan period 2011-2036, (reduced from 500 to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the town than the previous Preferred options document , the numbers of new housing allocations should be flexible, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement above the level that the existing Objectively assessed Housing need (OAHN) figures show, when further studies are carried out. We suggest an over allocation, rather than an under allocation be allowed for. We wish to highlight the current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants. We consider this will, over time, lead to distribution out from the Sub regional centres to the larger towns/village settlements, and therefore housing allocation number increases could be required for Crowland with its existing very good level of facilities and services.

Officer Comment:

A slight increase in the housing requirement is considered necessary to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Consequently it is considered that a change to Crowland’s housing requirements should be made, and that the Local Plan should provide for 500 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the housing allocation to 500

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

ID1: 582 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations,

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

ID1: 583 comment\_author: Pygott & Crone

comment content:

The emerging Local Plan provides for significant new housing within areas of the districts which are at a lower risk of flooding. Support: The provision of new housing within areas at a lower risk of flooding is in accordance with paragraphs 94, 100 and 101 of the National Planning Policy Framework which requires local authorities to have regard for the impact of new development on the potential for future flooding. SHLAA: Paragraph 3.2 identifies a proposed housing density of 20 dwellings per hectare in settlement locations other than those specifically identified. Objection: In our opinion, the Councils should adopt a policy whereby the emerging Local Plan provides flexibility for increased densities where it would be appropriate to the individual site layout.

Officer Comment:

The SHLAA does not set planning policy and any assumed densities put forward in the SHLAA are provided to assess a capacity for sites in either urban or rural locations. It is recognised that developers will put forward schemes of different density based upon a range of material considerations that are too detailed for a SHLAA to consider.

Officer Recommendation:

No change to the SHLAA approach or the Local Plan is required.

ID1: 584 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 380 new housing site allocations for this market town, in the plan period 2011-2036, (reduced from 500 to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the town than the previous Preferred options document , the numbers of new housing allocations should be flexible, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement above the level that the existing Objectively assessed Housing need (OAHN) figures show, when further studies are carried out. We suggest an over allocation, rather than an under allocation be allowed for. We wish to highlight the current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants. We consider this will, over time, lead to distribution out from the Sub regional centres to the larger towns/village settlements, and therefore housing allocation number increases could be required for Crowland with its existing very good level of facilities and services.

Officer Comment:

A slight increase in the housing requirement is considered necessary to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Consequently it is considered that a change to Crowland’s housing requirements should be made, and that the Local Plan should provide for 500 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the housing allocation to 500

ID1: 585 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 380 new housing site allocations for this market town, in the plan period 2011-2036, (reduced from 500 to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the town than the previous Preferred options document , the numbers of new housing allocations should be flexible, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement above the level that the existing Objectively assessed Housing need (OAHN) figures show, when further studies are carried out. We suggest an over allocation, rather than an under allocation be allowed for. We wish to highlight the current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants. We consider this will, over time, lead to distribution out from the Sub regional centres to the larger towns/village settlements, and therefore housing allocation number increases could be required for Crowland with its existing very good level of facilities and services.

Officer Comment:

A slight increase in the housing requirement is considered necessary to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Consequently it is considered that a change to Crowland’s housing requirements should be made, and that the Local Plan should provide for 500 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the housing allocation to 500

ID1: 586 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 150 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 200 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for a great degree of flexibility in its numbers of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement than the existing Objectively assessed Housing need (OAHN) figures show. We suggest an over allocation, rather than an under allocation be allowed for. This is because we consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Moulton Chapel with its existing good level of village services.

Officer Comment:

The support for Moulton Chapel’s proposed housing requirement of 150 dwellings is noted. We will reconsider housing numbers when we receive updated population data. Policy 11 says “provision will be made for a net increase of at least...” Therefore, the approach we are taking provides flexibility and are not ceiling figures. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to slightly reduce the number of dwellings proposed in Moulton Chapel.

Officer Recommendation:

Øwing to these comments it is considered that a change to Moulton Chapel’s housing requirements is required and the Local Plan should identify housing allocations in Moulton Chapel for 130 dwellings between April 2011 and 31st March 2036.

ID1: 587 comment\_author: Longstaffs

## comment content:

We consider the proposed Policy 12 , which provides for 230 new housing site allocations for Gosberton, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment (SHMA)2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should be flexible in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). An over allocation of sites would allow for the possible variances in the yearly SHMAs. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Gosberton with its existing high level of village services (it being the highest ranking settlement in the Minor Service village category with a sustainability score of 87).

## Officer Comment:

The support for Gosberton 's proposed housing requirement of 230 dwellings is welcome. We will reconsider housing numbers when we receive updated population data.

The Gosberton Risegate and Clough Housing paper suggests that the 40 dwelling allocation is added to Gosberton's allocation.

## Officer Recommendation:

Due to these comments it is considered that a change to Gosberton's housing requirements is required and the Local Plan should identify housing allocations in Gosberton for 270 dwellings between April 2011 and 31st March 2036.

ID1: 588 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 80 new housing site allocations for Gedney Church End, in the plan period 2011-2036, (reduced from 100 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should be a considered a flexible figure, for the purposes of assessing new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), as if numbers swing by the 25% range as seen above, it may give rise to further allocations being requirement than the existing Objectively assessed Housing need (OAHN) figures show. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the villages with good existing high levels of village services.

Officer Comment:

Concerns were raised about Gedney Church End about:

- treating Gedney Church End and Gedney Black Lion End differently when they score the same in the Sustainability of Settlements study. It exacerbates the split in the village.
- the classification of Gedney Church End as a 'Minor Service Centre'
- the scale of population increase and it being more than envisaged in Boston, Spalding and Main Service Centres
- the lack of facilities and the inability of the utilities to cope with the proposed development.

Officer Recommendation:

Gedney Church End should be re-categorised as Other Service Centres and Settlements and along with Gedney Black Lion End named 'Gedney' and shown on one map. As a result no sites will be allocated. Infill development within the settlement boundary would be acceptable. The development boundary has been drawn across Ged025 to link the rear boundaries of those properties that front Tops Gate and Church End so that it does not adjoin the curtilage of the Church.

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

ID1: 589 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which currently provides for 150 new housing site allocations for Whaplode, in the plan period 2011-2036, should be flexibly considered and with ever changing Objectively assessed Housing Need statistics, should provide for an allocation in excess of this figure, not below. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Whaplode with its existing very good level of village services.

Officer Comment:

The support for Whaplode's proposed housing requirement of 150 dwellings is welcome. We will reconsider housing numbers when we receive updated population data. Policy 11 says "provision will be made for a net increase of at least..." Therefore, the approach we are taking provides flexibility and are not ceiling figures.

Officer Recommendation:

No change to the approach is required.

ID1: 590 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which currently provides for 150 new housing site allocations for Whaplode, in the plan period 2011-2036, should be flexibly considered and with ever changing Objectively assessed Housing Need statistics, should provide for an allocation in excess of this figure, not below. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Whaplode with its existing very good level of village services.

Officer Comment:

1. The support for Whaplode's proposed housing requirement of 150 dwellings is noted. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 of the Housing Paper it is considered that the Local Plan should seek to slightly reduce the number of dwellings proposed in Whaplode.

Officer Recommendation:

Due to these comments it is considered that a change to Whaplode's housing requirements is required and the Local Plan should identify housing allocations in Whaplode for 80 dwellings between April 2011 and 31st March 2036.

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

ID1: 591 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 400 new housing site allocations for Swineshead, in the plan period 2011-2036, may require amendment. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Swineshead with its existing good level of village services.

Officer Comment:

The scale of growth proposed for Swineshead took account of the most up-to-date information on migration rates.

Officer Recommendation:

No change is required to Swineshead's housing requirements.

ID1: 592 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 80 new housing site allocations for Gedney Hill, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should be flexible and over allocations should be preferred, to allow for ever changing requirements for new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village being a service centre to many of the other smaller service centres in surrounding area.

Officer Comment:

The support for Gedney Hill's proposed housing requirement of 80 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Consequently it is considered that a change to Gedney Hill's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036

ID1: 593 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 80 new housing site allocations for Gedney Hill, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should be flexible and over allocations should be preferred, to allow for ever changing requirements for new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village being a service centre to many of the other smaller service centres in surrounding area.

Officer Comment:

The support for Gedney Hill's proposed housing requirement of 80 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Consequently it is considered that a change to Gedney Hill's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036

ID1: 594 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 80 new housing site allocations for Gedney Hill, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village being a service centre to many of the other smaller service centres in surrounding area.

Officer Comment:

The support for Gedney Hill's proposed housing requirement of 80 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Consequently it is considered that a change to Gedney Hill's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036

ID1: 595 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 80 new housing site allocations for Gedney Hill, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should be flexible and over allocations should be preferred, to allow for ever changing requirements for new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area). We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village being a service centre to many of the other smaller service centres in surrounding area.

Officer Comment:

The support for Gedney Hill's proposed housing requirement of 80 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Consequently it is considered that a change to Gedney Hill's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036

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

ID1: 596 comment\_author: Longstaffs

## comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should be very flexible in quantifying the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District. Cont d.. However we have noted the prioritisation of the suggested development of land in the north west quadrant of Spalding, and consider that the South East Lincolnshire Forward Planning team, appear to be concentrating all their efforts to open up an additional area for housing development, north/west of The Vernatts/Joint Railway Line. There is also extensive development consented already in the south west sector. Because we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the site Mon 013, could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South

## Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Other sites to the south of the Vernatts Drain and adjacent Horseshoe Road are being put forward as Preferred Sites for development.

## Officer Recommendation:

Increase the Spalding housing allocation to 5880.

west of Spalding) to have a potential to provide housing development in the Spalding district, and leave the area to the North West as farmland. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability of those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horseshoe Road, it would do a lot to improve the traffic congestion in the town, and by limiting the Relief road to this section, making traffic use the southern route out of the town, to travel south as well as north, would be a relief to Spalding, and achieve deliverability of housing ahead of the alternative Full relief road taking possibly 30-50 years to materialise. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside “ going west and south west of

Spalding in this area is sensible “ going north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of areas of Preferred Housing sites to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of development opportunities.

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ID1: 597 comment\_author: Mr Phil Ward

comment\_content:

Re: Long Sutton - Whilst I accept that there will be a case for increased house building in Long Sutton, if only to house the organic growth of the existing community, I do not believe it needs the numbers mentioned at the meeting. There is insufficient safe access options to service access roads for the proposed Seagate Road development. Environmentally, housing should be developed in the conurbations which will realistically increase the opportunities for future increased employment.

Officer Comment:

The Highways Authority have not indicated that the current traffic flows and road safety on Seagate Road would be adversely impacted by the development of this site.

Officer Recommendation:

Los015 (including Los012 and Los030) is one of the more suitable Potential Housing Sites in Long Sutton and should be taken forward as Preferred Option Housing Allocation.

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

ID1:

598

comment\_author: Chestnut Homes

comment content:

We welcome the emphasis of future development on the sub-regional centres and in particular the concentration of development within the Boston Borough Council area on the urban area of Boston. The suggested figure of 5,900 homes represents approximately 78% of the projected housing needs for the Local Plan period and we believe this should be an absolute minimum and could in fact be justifiably increased to take an even greater proportion of the Boston area's housing need.

At the present time, as outlined in paragraph 5.2.4 this draft Local Plan does not identify specific options for which housing sites have been identified to deliver the housing numbers required. At Policy 13 relating to the sustainable urban extension for housing in Spalding, it is clear that at least one of the proposed sites within Spalding has been specifically identified in relation to the delivery of the Spalding Western Relief Road. As has been outlined in more detail in previous representations, the Q2 development provides an overwhelming case for an allocation for a mixed use Sustainable Urban Extension in this Local Plan. The Quadrant project has been brought forward as a cohesive two phased development aimed at creating a Sustainable Urban Extension to the south western side of Boston, providing an attractive gateway into the Town and crucially delivering the initial phases of the distributor road. No other sites within those under consideration as future housing allocations are capable of delivering on the suite of policy objective that can be satisfied by Q2. It is a sustainable location being a logical extension to the south West side of town, close

Officer Comment:

There is evidence to support the direction of a higher proportion of the Borough's housing requirements to the town of Boston - the Boston Borough Council Strategic Housing Market Assessment (July 2015) identifies that 84.6% of the Borough's housing needs (2011-2036) are within Boston town. However, policy 12 of the emerging Plan directs 78.7% of the Borough's new housing to the town to: reflect the general lack of availability of land at lower risk of flooding in and around the town; and allow the direction of slightly increased housing to the settlements between Boston and Spalding to take advantage of their 'cluster' potential. The objection does not seek to address these issues, and does not set out any substantive arguments to justify an increase.

Support for employment land at Q2 is welcome.

The support for site Sou006 is welcomed. The Plan is not yet at the stage of making firm allocations of land for development, considering the infrastructure implications of the proposed development, or setting out an implementation strategy. These matters will be dealt with in later versions of the document.

Officer Recommendation:

No change to Boston's housing requirement is necessary.

BO008 is one of the more suitable Potential Employment Sites in Boston Borough and should be taken forward as a Preferred Option Employment Allocation.

Site Sou006 should be taken forward as a Preferred Housing Site.

to the town centre and links well with existing roads, cycle and footpath links. It fits with the Fens Waterway project, a key economic regeneration project via the provision of a Marina as a focal point of this high quality aspirational development. The Whole Plan Viability Study has confirmed that the site is deliverable and developable (paragraph 6.4.4). The conclusions of this study significantly enhance the case for the allocation of Q2 as the major urban extension for Boston. The current proposal not to charge CIL will significantly reduce the potential sites that could contribute to the delivery of the new distributor road, as any such contributions would need to be directly related to the proposed development in accordance with planning policy requirements. The emphasis within the Local Plan on the delivery of the distributor road effectively makes Q2 the next logical site to be allocated, enabling the next phase of the road to be delivered following completion of the Q1 phase, which is due to commence very shortly. We would therefore suggest that a similar policy to Policy 13 is adopted for the Boston area to incorporate the Q2 Quadrant development. The inclusion of The Quadrant Q2 as an employment site and with reference to the distributor road, provides additional justification for adopting this approach at this stage. There must be a recognition that a partnership approach will be required to deliver such large strategic sites and it is vital that these processes are progressed in tandem with the Local Plan process to ensure a robust case can be presented through the Local Plan process.

ID1: 599 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 80 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 100 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement, than the current Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Cowbit with its very good existing level of village services.

Officer Comment:

The support for Cowbit's proposed housing requirement of 80 dwellings is welcome.  
However, a slight increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Officer Recommendation:

Owing to these comments it is considered that a change to Cowbit's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036.

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

ID1: 600 comment\_author: Mrs L Pears

comment content:

Re: Long Sutton - - There has been no motive behind why these properties should be developed specifically in Long Sutton. The housing market here is not nearly as buoyant as the nearby towns of Kings Lynn and Spalding for example and properties appear to be much slower to sell; the eco-homes along Gedney Road being a case in point. In summary I believe that the community share a view that should all of these properties are to be built we will effectively become a commuter town.

Officer Comment:

It is not considered that the comments made by consultees justify a change to Long Sutton's housing requirements. However, a slight reduction in the housing requirement is considered necessary based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5. Consequently, it is considered that a change to Long Sutton's housing requirements should be made, and that the Local Plan should provide for 560 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Reduce the housing allocation to 560.

ID1: 601 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 190 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 250 to reflect the Peterborough Sub Region Strategic Housing market assessment (SHMA) 2015 update, as that report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should allow for and have a great degree of flexibility in the number of new housing allocations. We consider if numbers swing by the 25% range as seen above, and clearly the numbers are ever changing, it may give rise to further allocations being a requirement in another review of the SHMA. It is better to allow for an over allocation than an under-allocation. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Moulton with its very good existing level of village services.

Officer Comment:

The support for Moulton's proposed housing requirement of 190 dwellings is noted. We will reconsider housing numbers when we receive updated population data. Policy 11 says "provision will be made for a net increase of at least..." Therefore, the approach we are taking provides flexibility and are not ceiling figures. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 of the Housing Paper it is considered that the Local Plan should seek to reduce the number of dwellings proposed in Moulton.

Officer Recommendation:

owing to these comments it is considered that a change to Moulton's housing requirements is required and the Local Plan should identify housing allocations in Moulton for 90 dwellings between April 2011 and 31st March 2036.

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

ID1: 602 comment\_author: Longstaffs

## comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District. However we have noted the prioritisation of the suggested development of land in the north west quadrant of Spalding, and consider that the South East Lincolnshire Forward Planning team, appear to be concentrating all their efforts to open up an additional area for housing development, north/west of The Vernatts/Joint Railway Line. There is also extensive development consented already in the south west sector. Because we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the site Mon 019, and others in this sector, could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South

## Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Other sites to the south of the Vernatts Drain and adjacent Horseshoe Road are being put forward as Preferred Sites for development.

## Officer Recommendation:

Increase the Spalding housing allocation to 5880.

west of Spalding) to have a potential to provide housing development in the Spalding district, and leave the area to the North West to farmland. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability of those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful housing development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horseshoe Road, it would do a lot to improve the traffic congestion in the town, and by limiting the Relief road to this section, making traffic use the southern route out of the town, to travel south as well as north, would be a relief to the whole of Spalding, and achieve deliverability of housing ahead of the alternative Full relief road taking possibly 30-50 years. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside “ going west and

south west of Spalding in this area is sensible “ going north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of areas of Preferred Housing sites to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of development opportunities.

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

ID1: 603 comment\_author: Longstaffs

## comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District. However we have noted the prioritisation of the suggested development of land in the north west quadrant of Spalding, and consider that the South East Lincolnshire Forward Planning team, appear to be concentrating all their efforts to open up an additional area for housing development, north/west of The Vernatts/Joint Railway Line. There is also extensive development consented already in the south west sector. Because we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the site Mon 019, and others in this sector, could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South

## Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Other sites to the south of the Vernatts Drain and adjacent Horseshoe Road are being put forward as Preferred Sites for development.

## Officer Recommendation:

Increase the Spalding housing allocation to 5880.

west of Spalding) to have a potential to provide housing development in the Spalding district, and leave the area to the North West to farmland. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability of those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful housing development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horseshoe Road, it would do a lot to improve the traffic congestion in the town, and by limiting the Relief road to this section, making traffic use the southern route out of the town, to travel south as well as north, would be a relief to the whole of Spalding, and achieve deliverability of housing ahead of the alternative Full relief road taking possibly 30-50 years. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside “ going west and

south west of Spalding in this area is sensible “ going north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of areas of Preferred Housing sites to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of development opportunities.

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

ID1: 604 comment\_author: Longstaffs

## comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District. However we have noted the prioritisation of the suggested development of land in the north west quadrant of Spalding, and consider that the South East Lincolnshire Forward Planning team, appear to be concentrating all their efforts to open up an additional area for housing development, north/west of The Vernatts/Joint Railway Line. There is also extensive development consented already in the south west sector. Because we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the site Mon 019, and others in this sector, could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South

## Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Other sites to the south of the Vernatts Drain and adjacent Horseshoe Road are being put forward as Preferred Sites for development.

## Officer Recommendation:

Increase the Spalding housing allocation to 5880.

west of Spalding) to have a potential to provide housing development in the Spalding district, and leave the area to the North West to farmland. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability of those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful housing development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horseshoe Road, it would do a lot to improve the traffic congestion in the town, and by limiting the Relief road to this section, making traffic use the southern route out of the town, to travel south as well as north, would be a relief to the whole of Spalding, and achieve deliverability of housing ahead of the alternative Full relief road taking possibly 30-50 years. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside “ going west and south west of Spalding in this area is

sensible “ going north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of areas of Preferred Housing sites to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of development opportunities.

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

ID1: 605 comment\_author: Longstaffs

## comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District. However we have noted the prioritisation of the suggested development of land in the north west quadrant of Spalding, and consider that the South East Lincolnshire Forward Planning team, appear to be concentrating all their efforts to open up an additional area for housing development, north/west of The Vernatts/Joint Railway Line. There is also extensive development consented already in the south west sector. Because we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the sites Mon 008 and 016, could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South west of Spalding) to have a

## Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Other sites to the south of the Vernatts Drain and adjacent Horseshoe Road are being put forward as Preferred Sites for development.

## Officer Recommendation:

Increase the Spalding housing allocation to 5880.

potential to provide housing development in the Spalding district, and leave the area to the North West. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability of those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horseshoe Road, it would do a lot to improve the traffic congestion in the town, and by limiting the Relief road to this section, making traffic use the southern route out of the town, to travel south as well as Cont d ; north, would be a relief to the whole of Spalding, and achieve deliverability of housing ahead of the alternative Full relief road taking possibly 30-50 years. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside “ going west and south west of Spalding in this area is sensible “ going

north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of areas of Preferred Housing sites to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of development opportunities. The sites are in close proximity to primary schools, and the town centre

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ID1: 607 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 150 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 200 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being requirement than the existing Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Moulton Chapel with its existing good level of village services.

Officer Comment:

The support for Moulton Chapel's proposed housing requirement of 150 dwellings is noted. We will reconsider housing numbers when we receive updated population data. Policy 11 says "provision will be made for a net increase of at least..." Therefore, the approach we are taking provides flexibility and are not ceiling figures. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to slightly reduce the number of dwellings proposed in Moulton Chapel.

Officer Recommendation:

Ⓣwing to these comments it is considered that a change to Moulton Chapel's housing requirements is required and the Local Plan should identify housing allocations in Moulton Chapel for 130 dwellings between April 2011 and 31st March 2036.

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

ID1:

608

comment\_author: Mr A and Dr G Ward

comment content:

Please find below our comments on the draft South East Lincolnshire Local Plan, in particular with regards to the village of Sutterton. As residents of Sutterton we are commenting on the Sutterton part of the draft South East Lincolnshire Local Plan. Since we moved to Sutterton two years ago, we have seen the closure of two pub/restaurants, one newsagent and a caravan retailer, leaving just one small corner shop to serve the entire village. There are no public houses/eating establishments other than a fish and chip shop and there are even rumours that we may lose our remaining corner shop soon. We have chosen to remain registered at our previous doctor's surgery as we have heard it is oversubscribed at the Sutterton surgery and we have heard that we are not guaranteed to obtain a place for our child at the local school. This, coupled with the lack of employment opportunities in Sutterton, means that it is a commuter village where you require a car both for business and leisure purposes. We fail to understand how Sutterton would be able to sustain housing growth at the levels proposed in the draft Local Plan. We fail to understand the reasoning for highlighting the areas of recreational open space in the village as many of those highlighted are simply not useable recreational space. Bell Mere Pool is highlighted but is a nature reserve area, the school is highlighted which is obviously private property, and several small areas within housing estates are highlighted which if viewed from the ground would become obvious they are not usable recreational spaces. As the village is near two major A roads, it is somewhat of a cut-through for traffic, meaning that the recreational spaces that are suitable for children to use

Officer Comment:

Sutterton's place in the Plan's Spatial Strategy took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. Furthermore, as the Spatial Strategy Background Paper makes clear "Sutterton is now defined as a Main Service Centre due to its proximity as a 'cluster' settlement and this is reflected in its sustainability score. Sutterton also offers some opportunities for growth in areas with marginally better flood risk. In preparing a plan for South East Lincolnshire as a whole, the opportunity arose to examine the settlements between the proposed Sub-Regional Centres of Boston and Spalding from a different perspective. Sutterton is in this 'mid-way area'" (paragraph 6.10). It is considered that this approach accords with the advice in paragraph 55 of the National Planning Policy Framework that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby."

Officer Recommendation:

No change to Sutterton's place in the Spatial Strategy is necessary.

can be problematic and unsafe to access. We would strongly question why Sutterton has been classed as a Main Service Centre meaning that it helps meet the service needs of other local communities. Having lived in Kirton previously we regularly (two to three times a week) travel back to Kirton to shop, use the cash point, visit the library etc. Much as we enjoy living in Sutterton we fail to see why people living in the surrounding villages would have a need to visit here when such few services exist. In our opinion every other single village named as a Main Service Centre has significantly more facilities than Sutterton has. We would consider Sutterton to be more on a par with a village such as Wigtoft, designated as a Minor Service Centre. In fact some of the Minor Service Centres, such as Surfleet, appear to have more services than that of Sutterton. In conclusion, we feel that the assessment of Sutterton as a Main Service Centre is based on out of date information with regards to services and is incorrect in terms of useable recreational open space. We strongly feel that Sutterton would be unable to support development at the levels indicated in the draft South East Lincolnshire Local Plan.

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ID1:

609

comment\_author: Spalding Peterborough Transport

comment content:

The house building programme in this area will support key workers getting on the housing ladder commuting out of area for employment which is happening already with the current stock. Thus supporting the need for better transport links with an intergrated rail and bus service. Spalding is a historically known as a Market Town well known for the food industry Agricultural and Horticultural activities. We have an industrial site to the east of the town away from house building West of the town. It is important to keep the two separate. Providing the Officers follow their own policies of ensuring infrastructure and local facilities are provided at the same time as new homes, We have no objections to current proposals We would argue this includes intergrated and better transport services and ask consideration to be given to support the re opening of Littleworth to relieve traffic from housing developments at Woolam Wygate, Holland park keeping traffic away from the town other catchment areas of Deeping St James , Market Deeping Bourne and Crowland relieving traffic from the A15 from existing house building and proposed housing sites from Peterborough City Council.

Officer Comment:

The support is welcomed. However, the reopening of Littleworth Station cannot be placed in the Local Plan owing to uncertainty on its implementation. In addition if the scheme is advanced it can be suitably considered against national policy and the policies contained in the Local Plan.

Officer Recommendation:

No change to the approach is required.

ID1: 610 comment\_author: Louise McGuinness

comment content:

The house building programme in this area will support key workers getting on the housing ladder commuting out of area for employment which is happening already with the current stock. Thus supporting the need for better transport links with an intergrated rail and bus service. Spalding is a historically known as a Market Town well known for the food industry Agricultural and Horticultural activities. We have an industrial site to the east of the town away from house building West of the town. It is important to keep the two separate. Providing the Officers follow their own policies of ensuring infrastructure and local facilities are provided at the same time as new homes, We have no objections to current proposals We would argue this includes intergrated and better transport services and ask consideration to be given to support the re opening of Littleworth to relieve traffic from housing developments at Woolam Wygate, Holland park keeping traffic away from the town other catchment areas of Deeping St James , Market Deeping Bourne and Crowland relieving traffic from the A15 from existing house building and proposed housing sites from Peterborough City Council.

Officer Comment:

The support is welcomed. However, the reopening of Littleworth Station cannot be placed in the Local Plan owing to uncertainty on its implementation. In addition if the scheme is advanced it can be suitably considered against national policy and the policies contained in the Local Plan.

Officer Recommendation:

No change to the approach is required.

ID1: 611 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 150 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 200 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being requirement than the existing Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Moulton Chapel with its existing good level of village services.

Officer Comment:

The support for Moulton Chapel's proposed housing requirement of 150 dwellings is noted. We will reconsider housing numbers when we receive updated population data. Policy 11 says "provision will be made for a net increase of at least..." Therefore, the approach we are taking provides flexibility and are not ceiling figures. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to slightly reduce the number of dwellings proposed in Moulton Chapel.

Officer Recommendation:

Ⓣwing to these comments it is considered that a change to Moulton Chapel's housing requirements is required and the Local Plan should identify housing allocations in Moulton Chapel for 130 dwellings between April 2011 and 31st March 2036.

ID1: 612 comment\_author: Longstaffs

## comment content:

We consider the proposed Policy 12 , which provides for 150 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 200 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being requirement than the existing Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Moulton Chapel with its existing good level of village services.

## Officer Comment:

The support for Moulton Chapel’s proposed housing requirement of 150 dwellings is noted. We will reconsider housing numbers when we receive updated population data. Policy 11 says “provision will be made for a net increase of at least...” Therefore, the approach we are taking provides flexibility and are not ceiling figures. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to slightly reduce the number of dwellings proposed in Moulton Chapel.

## Officer Recommendation:

Ⓣwing to these comments it is considered that a change to Moulton Chapel’s housing requirements is required and the Local Plan should identify housing allocations in Moulton Chapel for 130 dwellings between April 2011 and 31st March 2036.

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

ID1: 613 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

ID1: 614 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 190 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 250 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement, than the current Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Moulton with its very good existing level of village services.

Officer Comment:

The support for Moulton’s proposed housing requirement of 190 dwellings is noted. We will reconsider housing numbers when we receive updated population data. Policy 11 says “provision will be made for a net increase of at least...” Therefore, the approach we are taking provides flexibility and are not ceiling figures. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 of the Housing Paper it is considered that the Local Plan should seek to reduce the number of dwellings proposed in Moulton.

Officer Recommendation:

Ⓒwing to these comments it is considered that a change to Moulton’s housing requirements is required and the Local Plan should identify housing allocations in Moulton for 90 dwellings between April 2011 and 31st March 2036.

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

ID1: 615 comment\_author: Old Leake Parish Council

comment content:

The Parish Council recognises and appreciates the requirements of Policy for villages to grow and expand to meet housing needs, and does not oppose the total number of houses which the Plan seeks to provide. 100 houses over the next Plan Period would not be unreasonable and out of proportion with the village as it currently is... To reiterate, the Parish Council is content to accept the intention to build an additional 100 houses in Old Leake settlement. This is despite being somewhat disappointed that this Local Plan once again seeks to place all of its site allocations in larger villages (which have taken extraordinary development under the previous/ current Local Plan) while overlooking smaller settlements entirely.

Officer Comment:

The support is welcomed.

Officer Recommendation:

No change to Old Leake's housing requirement is necessary.

ID1: 616 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12, which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment " 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding's housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

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

ID1: 617 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for Spalding, in the plan period 2011-2036, (altered to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update), should allow for flexibility in the number of new housing allocations, (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area), and clearly the position is ever changing, particularly considering current immigration increases in the District.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

ID1: 618 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 150 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 200 to reflect the Peterborough Sub region Strategic Housing market assessment “ 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being requirement than the existing Objectively assessed Housing need (OAHN) figures show, in another review of the SHMA.

We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Surfleet with its existing good level of village services.

Officer Comment:

The support for Surfleet’s proposed housing requirement of 150 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Due to these comments it is considered that a change to Surfleet’s housing requirements is required and the Local Plan should identify housing allocations in Surfleet for 180 dwellings between April 2011 and 31st March 2036.

Officer Recommendation:

A change to the Policy is recommended

ID1: 619 comment\_author: Longstaffs

comment content:

We consider the proposed Policy 12 , which provides for 150 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 200 to reflect the Peterborough Sub region Strategic Housing market assessment 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), whilst providing a higher and more satisfactory level of growth for the village than the previous Preferred options document, should have a great degree of flexibility in the number of new housing allocations, as we consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being a requirement above those than the existing Objectively assessed Housing need (OAHN) figures show, in another review round of the SHMA. We consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the village of Surfleet with its existing good level of village services.

Officer Comment:

The support for Surfleet's proposed housing requirement of 150 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion below in Sections 5 and 6 to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Due to these comments it is considered that a change to Surfleet's housing requirements is required and the Local Plan should identify housing allocations in Surfleet for 180 dwellings between April 2011 and 31st March 2036.

Officer Recommendation:

A change to the Policy is recommended

ID1:

620

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

Policy 12: Distribution of New Housing We support Crowland's place in the overall hierarchy and consider that it accurately reflects the role the settlement plays in a wider catchment. Crowland is a long established market town within the South Holland District with a varied range of employment opportunities, local services and shopping. The abbey attracts tourists to the town and the abundance of green infrastructure creates a pleasant living environment. The completion of the new A16 to the east of the town has created improved transport links with Spalding and especially Peterborough. The emerging Local Plan indicates that approximately 380 dwellings should be built in Crowland over the plan period and that with existing commitments, allocations are sought to accommodate approximately 266 dwellings. A Level 2 SFRA is currently underway and, until such time as this work is complete, it would seem premature to discount any site adjacent to the existing settlement boundary that could potentially provide the necessary land for the approximate amount of housing anticipated to be accommodated in Crowland. Equally, the results of the SFRA might indicate that the town has land that is sequentially preferable in Flood Risk terms to sites adjacent to other Main Service Centres resulting in greater numbers being allocated to Crowland.

Officer Comment:

Tthe Crowland Housing Paper, January 2016 recognised that 'no hazard mapping has been undertaken for this area so classification of 'no hazard' may not be correct. Tidal and River Nene sources do not reach the sites but other potential sources (including fluvial) could'. Although the updated SFRA is not available yet, it will be used to inform the selection of allocations in the Publication Draft Local Plan;

Officer Recommendation:

It is not considered that the comments made by consultees justify a change to Crowland's housing requirements. However a slight increase in the housing requirement is considered necessary to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Consequently it is considered that a change to Crowland's housing requirements should be made, and that the Local Plan should provide for 500 dwellings between 1st April 2011 and 31st March 2036.

ID1: 621 comment\_author: Mr Gary Edwards

comment content:

Re: Long Sutton - The town does not require any more houses. There have been numerous builds over the recent years and there are developments already on the go. The Town Certainly does not need or can support any more inhabitants, the surgery is overwhelmed, the town and supermarket are also overwhelmed already. To date I have never heard of any one saying they would like to come and live here but can't find anywhere to live I would question the logic that Long Sutton needs more housing where it is a town that sees the younger members move away to where the work is (London, Peterborough, Kings Lynn etc.) and the elderly enjoy living out the rest of their lives.

Officer Comment:

The Peterborough Sub Regional Strategic Housing Market Assessment identifies that 10,750 new dwellings are required to meet South Holland's housing needs over the plan period. This has been apportioned between settlements in the hierarchy to meet each settlements housing needs, including those of younger people

Officer Recommendation:

It is not considered that the comments made by consultees justify a change to Long Sutton's housing requirements. However, a slight reduction in the housing requirement is considered necessary based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5. Consequently, it is considered that a change to Long Sutton's housing requirements should be made, and that the Local Plan should provide for 560 dwellings between 1st April 2011 and 31st March 2036.

ID1:

622

comment\_author: Long Sutton and District Civic Soci

comment content:

The Councils appear to discount the evidence of the Lincolnshire Coastal Management Plan, Environment Agency and SHDC Flood Risk Strategy which suggest that new development should not take place over much of the plan area and/or that there is the likelihood of flooding in some settlements in the Society's area of interest (Long Sutton, Little Sutton, Sutton Bridge, Luton, Gedney Drove End, Dawsmere, Sutton St James, Tydd St Mary and Tydd Gote) within the likely economic life of housing built on sites allocated in the Plan. Sustainable communities depend on a wide range of influences only a few of which are within the direct control of the Plan. Much of the Plan area is for example rural and ill served by public transport. Further erosion of transport subsidy by the County Council, as is a distinct possibility over the life of the Plan will, other things being equal, result in increased isolation for those without access to other means of transport from places of work, entertainment, shopping and health services. A greater focus of new housing around transport hubs as suggested in the NPPF review would help ameliorate this, recognising though that a bus stop in itself does not constitute a hub! Allied to the above, the vision seeks to deliver the housing, employment and other needs of the whole population, but it is apparent from the distribution of proposed employment and housing sites that they are not necessarily where the jobs or housing is or will be needed to generate truly self-sustaining communities. This therefore largely defeats a principal tenet of the vision.

Re: Tydd St Mary

Tydd St Mary is a small settlement within the Society's

Officer Comment:

Sutton St James

All the sites are in Flood zone 3a. No hazard mapping has been undertaken for this area and so the Environment Agency has said a classification of 'no hazard' may not be correct. However, they do also say that there is no apparent hazard from tidal/fluvial sources. The two IDBs do not advise of serious problems. The inference of the comments is that development should be focused in the larger settlements, which is the approach. However, this is not at the expense of smaller settlements.

Tydd St Mary

1. The responses are concerned about the proposed housing target of 200 and its impact on the character of the village and the ability of services and facilities to cope.

2. All the sites are in flood zone 3a and the three sites Tyd003, Tyd006 and Tyd008 have no hazard for flood hazard and depth. The Environment Agency has said a classification of 'no hazard' may not be correct. However, they do also say that there is no apparent hazard from tidal/fluvial sources. The two IDBs do not advise of serious problems. They would therefore, be the sequentially appropriate sites.

3. However, Tyd003 and Tyd008 affect the character of the conservation area. Historic England raise this issue and advise further investigation is required. Tyd008 is hedged but nonetheless its development affects the open character of the junction of Rectory Road and Common Way. Tyd006, owing to its scale, has a significant impact on the character of Rectory Road, which runs down the edge of the conservation area. This

Officer Recommendation:

Sutton St James

The comments do not state whether the position Sutton St James holds in the Spatial Strategy is incorrect and so it is concluded that Sutton St James should remain a 'Minor Service Centre'.

Tydd St Mary

Owing to these comments it is considered that a change to Tydd St Mary's housing requirements is required and the Local Plan should identify housing allocations in Tydd St Mary for 40 dwellings between April 2011 and 31st March 2036.

area of interest and has proposed allocations for 200 new dwellings but has very limited facilities available locally with most services at least 4 miles away in Long Sutton or Wisbech. There is no regular bus service and no significant local industry, especially not within a 400m radius as suggested by the Plan. The proposal would irrevocably change the character of one of the more attractive villages of SE Lincolnshire, doubling the number of dwellings at the heart of the community and increasing the population by 50%. The population increase is likely to be insufficient to sustain additional local services, calling into question the logic of stepping outside the generality of the principal of sustainable development to propose housing in a location that ostensibly fails to meet the test.

is ameliorated by a belt of trees along the road side, but the views out into the countryside will change.

4. The comments relating to the school capacity are supported by the County Education department. Some comments refer to sewerage capacity issues. Anglian water advise that Tyd003 and Tyd008 require the foul sewerage network to be upgraded but Tyd006 and Tyd014 would not. As Tyd006 would be an in cohesive extension to the village without Tyd003, this suggests that Tyd014 would be the best site for sewerage and the reduced numbers would assist with the impact on the primary school.

5. Tyd014 has a flood hazard of Danger for some and a flood depth of 0.25-0.50m. Anglian water has advised that surface water network capacity has major constraints and all sites should seek to reduce flood risk and incorporate Sustainable Drainage Systems. The surface water flooding maps suggest surface water flooding on this site is no worse than elsewhere. Owing to the recent development close to this site to the north and east, development would be more in character with the location, than development along Rectory Road. Also Low Gate has been improved in this location and so highway costs would be lower.

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

ID1: 623 comment\_author: RPS CGMS

## comment content:

This policy states that new housing site allocations will be made to provide 500 dwellings in Kirton but: - Some of the Potential Housing Sites allocated for housing in the Policies Map have been classified as Undevelopable by the South East Lincolnshire Strategic Housing Land Availability Assessment published in January 2016 (SELSHLAA); And - At a density of 20 dph (Dwellings per Hectare) the total number of dwellings deliverable in the designated Potential Housing Sites would not suffice to meet the housing needs of Kirton. The SHLAA considers Sites FRA001, FRA002, FRA003, KIR003, KIR0034 and KIR010 undevelopable but the same sites have been included within the Potential Housing Sites of the Policies Map (Inset Map No.6). The developable sites identified in the SELSHLAA that have been confirmed and included in the Policies Map are Sites FRA005, FRA024, KIR013, KIR029, KIR033 and KIR038. In the SHLAA the capacity of developable housing sites in Kirton is subdivided per density (30 dph, 25 dph and 20 dph). The total number of dwellings that could be delivered in the plan period within the Potential Housing Sites of the Policies Map that are actually considered developable by the SHLAA is 464 at a density of 20dph. The draft Local Plan does not allocate sufficient land to meet the housing needs of Kirton. Some of the Potential Housing sites identified in the Policies Map were considered Undevelopable in the SELSHLAA. We consider that the allocated sites in Kirton are unlikely to achieve more than 20 dph. On this basis, the sites that have been allocated in the draft Local Plan would not fully meet the housing needs of Kirton. We therefore consider that further sites should be allocated. In addition, there is no certainty that all

## Officer Comment:

Inset Map 6 identifies 5 Potential Housing Sites, of which 4 are classed as developable in the SHLAA. The 4 developable Potential Housing Sites have a combined capacity of 657 dwellings at 20 dwellings to the hectare. The 4 developable Potential Housing Sites are all classed as available and achievable, and there is no evidence to suggest that they will not be delivered within the Local Plan period.

The site off Skeldyke Road, Kirton has been registered as Kir040. The Strategic Housing Land Availability Assessment (SHLAA) identifies this land as being undevelopable because it would have adverse environmental impacts and is poorly located

## Officer Recommendation:

No change is necessary.

Site Kir040 should not be taken forward as a Preferred Housing Site.

the allocated sites will be delivered in the Local Plan period. For the reasons set out above, the Local Plan would not comply with Paragraphs 47 and 48 of the NPPF. Proposed changes: - Increase the number of Potential housing sites by including windfall sites and sustainable sites located in the countryside - Increase the number of housing allocations of Kirton to allow more flexibility in the delivery of housing and avoid underprovision.

In terms of potential housing allocations, consideration should be given to allocating the site occupied by Ripe Now Ltd on Skeldyke Road, Kirton. This site has an area of 5.13 ha with the previously developed part of the site occupying an area of 0.17 ha. It is an underused existing employment site that could be considered for residential development as a whole or in part.

Review the connection between Policy 2 and Policy 12 to take into account previously developed land ( brownfieldsites ) - Actively promote the residential development of suitable brownfield sites, also having regard to the provisions of the Housing and Planning Bill. 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.

ID1: 624 comment\_author: Phil Lawrence

comment content:

Objection: Moulton is to have 190 new houses! Moulton cannot cope with 39 new houses being currently planned let alone 190. The infrastructure is simply not capable of supporting that many.

Officer Comment:

The Local Plan will be supported by an Infrastructure delivery Plan which will demonstrate how arising infrastructure needs will be met. The provision of employment land is influenced by employment land studies, which along with other studies to show our "Objectively Assessed Housing Needs" result in agricultural land being developed. The loss is minimised but cannot be avoided in order to meet our needs.

However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 of the Housing Paper it is considered that the Local Plan should seek to reduce the number of dwellings proposed in Moulton.

Due to these comments it is considered that a change to Moulton's housing requirements is required and the Local Plan should identify housing allocations in Moulton for 90 dwellings between April 2011 and 31st March 2036.

Officer Recommendation:

A change to the Policy is recommended

ID1:

625

comment\_author:

Woods Hardwick Planning Ltd

comment content:

In considering the quantum of growth that Crowland is proposed to accommodate, this figure can and should be increased. The amount of new housing that is proposed to be allocated to other less sustainable settlements lacks justification and is not considered to be aligned with the objectives of the NPPF to deliver sustainable development. The supporting text to Policy 12, at paragraph 5.2.8, states that the overall housing growth for settlements is considered to be proportionate to existing infrastructure capacity or in locations capable of improvement. Those locations identified capable of growth include minor service centres, which are stated within Policy 2 as being areas of limited development opportunity. This contradicts the levels of growth proposed in such locations, which are as much as 230 in some of the minor service centres. Crowland is a main service centre and we therefore submit that it is appropriate to deliver more than the 380 currently proposed.

Officer Comment:

The scale of housing growth proposed for Crowland took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; population and household projections, current demand from the market and the local availability of land at lower risk of flooding. In this case the evidence indicates that Crowland is able to accommodate at least 500 dwellings rather than the 380 dwellings previously identified. This should help sustain existing services, any more is likely to have an adverse impact on Crowland's infrastructure and services.

Officer Recommendation:

Increase Crowland's housing target to 500 in Policy 12.

ID1: 626 comment\_author: Mark Bassett

comment content:

Policy 12: Distribution of New Housing Policy 12 proposes the distribution of new housing between settlements of both Boston Borough Council and South Holland District Council. Specifically in relation to the distribution of housing within Boston Borough Council there are two main points of objection. Disproportionate reliance on Boston Urban Area Of the 7,500 dwellings proposed within the Boston Borough administrative areas, 5900 dwellings are proposed within or around Boston itself, which amounts to 79% of the total provision.

Based on the Objectively Assessed Housing Need figure of 7500, and notwithstanding our objection to this figure, this equates to Boston delivering 236 dwellings per annum over the 25 year life of the development plan. In comparison the Boston Housing Paper reports over the last four years the average number of dwellings completed in Boston has been just 87.5. At present the Draft Local Plan and supporting evidence is not convincing that Boston has the capability of delivering this number of dwellings. Whilst the SHLAA identifies potential capacity for circa 23,000 dwellings, some 19,129 of this total is through major urban extensions, comprising ten different sites. The SHLAA and Boston housing paper identifies significant barriers to development of the vast majority of these sites with multiple ownership issues, unconfirmed availability of significant portions of several sites, poor relationships with the town and complex highway/transport issues. Of the ten major urban extension sites, six are classified as undevelopable, immediately reducing the figure of 19,129 to 7,015 and none are identified for completion

Officer Comment:

It is not accepted that housing requirements in Boston Borough are disproportionately focused on the town of Boston - in fact the Boston Borough Council Strategic Housing Market Assessment (July 2015) suggests that the focus should be greater. [The Boston Borough Council Strategic Housing Market Assessment (July 2015) identifies that 84.6% of the Borough's housing needs (2011-2036) are within Boston town. However, policy 12 of the emerging Plan directs 78.7% of the Borough's new housing to the town to: reflect the general lack of availability of land at lower risk of flooding in and around the town; and allow the direction of slightly increased housing to the settlements between Boston and Spalding to take advantage of their 'cluster' potential.]

Whilst it is true that recent housing completions in the town have fallen far short of those sought by the Plan, it is considered that these figures predominantly reflect the fact that the housing market has been far from buoyant. The Plan's provisions are predicated upon the assumption that housing market conditions will improve. Lastly, whilst the objector may be correct that very few of the 'Potential Housing Sites' identified in Boston are considered likely to be completed in the next five years, the majority are nonetheless assumed to be under construction during this period and to deliver 927 new dwellings by year 10 of the Plan. Thus, it is not accepted that the housing requirement proposed for the town of Boston is undeliverable.

The scale of housing growth proposed for Kirton and Swineshead took account of many issues, including: the

Officer Recommendation:

No changes to the housing requirements for Boston, Swineshead or Kirton are necessary.

until the last 5 years of the plan period. In fact of the sites included within the Boston Housing Paper, sites totalling just 75 dwellings are predicted for completion within years 6-10 (ie the next five years). Whilst it is recognised that the SHLAA timescales are best estimates and other sites will deliver dwelling completions in the early part of the plan, there appears significant doubt that Boston will deliver the required annual provision over the first half of the plan period. In the absence of sufficient evidence to demonstrate that the strategy of promoting Boston and its immediate surrounding area as the location for the vast majority of residential development is deliverable, it is submitted that the Local Plan would fail to be justified and effective, as required by the NPPF. Recommendation: It is recommended that options are explored for an alternative split in housing numbers. It is suggested that the strategy is amended to analyse a lower proportion of housing within the Boston urban area and an increase in other settlements spread across the borough.

Distribution between Main Service Centres Of the remaining 1600 dwellings to be provided over the Plan period, 1200 are proposed through the Main Service Centres of Kirton (500), Swineshead (400) and Sutterton (300). Whilst the relationship between Kirton and Sutterton is broadly proportionate there is a clear disparity between the number of dwellings proposed for Kirton and Swineshead, when compared to how they perform in the Settlement Sustainability Paper (2015). Kirton is the highest performing settlement within Boston and scores 169 in comparison to 96 and 89 for Sutterton and Swineshead respectively. Kirton is proposed to be allocated just 100 dwellings more than Swineshead, despite a significant difference in their

findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. The relatively high level of housing growth proposed for Swineshead stemmed largely from the availability of land without flood hazard in and around that settlement, and it is not considered that the consultee's arguments set out any arguments to outweigh this issue

sustainability scores. Whilst it is appreciated that the distribution of dwellings is more complex than sustainability scores alone, it is submitted that the level of development proposed for Swineshead is too high, based on a comparatively poor sustainability rating. Swineshead, with a rating of 54 scores the lowest of all main service centres in terms of facilities and services, and in contrast Kirton scores 126. Swineshead scores comparatively poorly on Food/General Store provision (8 compared to 32 in Kirton), has no secondary school and lacks much in the way of children's play areas or playing fields. Recommendation: It is recommended that alterations are made to the numbers of dwellings allocated to the main service centres of Kirton and Swineshead to more proportionately reflect the sustainability of these settlements. Indicatively based on the sustainability credentials of the assessments and still accounting for other matters such as flood risk, it is suggested that a more justified allocation would be Kirton approximately 625 and Swineshead approx 275, notwithstanding that these numbers may increase as a result of objections relating to OAHN and the proportion of development between Boston and the rest of the borough.

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ID1: 627 comment\_author: Chris Atkinson

comment content:

Policy 12 " Distribution of New Housing Our Client is encouraged to note that the Council are proposing to deliver at least 500 dwellings within the Main Service Centre of Kirton, which recognises the sustainable nature of the settlement. In addition, our Client is encouraged to see that the target for Kirton has been increased from 420 in the previous version of the Local Plan. However, our Client objects to the contents of the South East Lincolnshire Local Plan: Housing Paper " Kirton (January 2016), which outlines the current housing situation in Kirton and the requirement throughout the lifetime of the Plan. Firstly, the calculations within the document are inaccurate, which means that the proposed allocations will not meet the current housing requirement for the settlement. The Council state that there are existing commitments of 173 units, which comprises of 140 through consent B/14//0094, 19 through consent B/07/0414 and 16 through consent B/14/0282. This equates to 175 and when the 2 completions from 1 April 2011 until 31 March 2015 are included this totals 177. The Council state that there is a residual target of 309 units which need to be accounted for through allocation, when in fact the correct figure is 323. In addition, the Council have not applied a buffer for non-implementation which is common practise and is an approach accepted by several Inspectors during Local Plan examinations. It is considered reasonable to incorporate a buffer of 10% for non-implementation which would equate to 17.5 units, which should be added to the residual requirement. We therefore conclude that the Council need to allocate enough land to accommodate 341 units, a shortfall of 32 units. Furthermore, it is noted

Officer Comment:

The support for the increase to Kirton's housing requirement is welcomed.

However, the consultee is mistaken in their argument that the residual housing calculations are incorrect, although these figures are now out-of-date.

It is understood that planning permission B/07/0414 has been started – thus it has not expired. There is no clear evidence to suggest that this planning permission will not be implemented, and therefore in accordance with advice in the National Planning Policy Framework, it is considered to be deliverable.

It is not agreed that a buffer for non-implementation should be added – the Plan includes generous provision to ensure that the area's housing needs will be met, namely:

- [redacted] assumes that sites in Kirton will be developed at a density of just 20 dwellings to the hectare, whereas the reality is that most sites will be developed at a higher density;
- [redacted] does not include a windfall allowance; and
- [redacted] seeks to meet the Plan's requirements through allocations in settlements in the top three tiers of the Spatial Strategy – i.e. Developments in the Other Service Centres and Settlements will be over and above the requirements

Officer Recommendation:

No change to the housing requirement for Kirton is necessary.

that reserved matters consent B/07/0414 was granted in 2007 and assuming that work has yet to commence on the site, the consent expired in 2009 and is no longer valid. If the permission has been implemented it must be questioned whether it is feasible to develop, given that 12 years have passed since outline consent was originally granted. Our Client's land is located within the settlement boundary of Kirton, and is the subject of a live outline planning application for the construction of 30 units, and it has been demonstrated through the application submission that the site is available, suitable and achievable. Further comments on the Council's Strategic Housing Land Availability Assessment (SHLAA) are provided within these representations.

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ID1:

628

comment\_author:

Deeping St Nicholas Parish Council

comment content:

Following a meeting of the Deeping St Nicholas Parish Council on the 15th February 2016 it was resolved to write to you as follows: Deeping St Nicholas is a dispersed settlement where development proposals need to be considered very carefully, Policy 12 of the emerging South Lincolnshire Local Plan states that the village could expand to the degree of 80 new households clustered to the west of Littleworth Drove. Whilst the Parish Council welcomes this proposed development in its opinion the expansion should be considerably more and include any land to the east of the new housing estate and older properties at Littleworth so that there would be a consolidation in the middle of the village and would not stretch too far. A possible area between Home Farm Road and the old sewage works on Chappell Road would then centralise the amenities that we hope to see i.e. a community hub and village shop, this would clearly ensure a more sustainable and viable community.

Officer Comment:

The amount of housing is considered appropriate for the size of the village.

Officer Recommendation:

No change to the approach is required.

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

ID1: 629 comment\_author: Lincolnshire County Council

## comment content:

### Strategic Planning Comments

It is noted that for both Boston and South Holland the distribution of housing to settlements based on the previous Boston and Peterborough SHMAs was reduced to reflect lower OANs in the updated SHMAs. Whereas for Boston, however, this took account of a revised assessment of their role and capacity, the figures for settlements in South Holland were reduced pro-rata, without any update of existing commitment and capacity, in the same Appendix A referred to above. LCC believes that the arbitrary pro-rata reduction for each settlement in South Holland does not result in a sustainable pattern of development, as it does not reflect the significant differences in the size, facilities and opportunities for sustainable growth in the proposed settlement hierarchy. The key evidence that should be used in re-apportioning housing targets to settlements is the document titled, "South East Lincolnshire" an assessment of settlements and their sustainability credentials" (June, 2015). This paper is not referred to in Appendix 2 of the draft Local Plan but is available on the SE Lincolnshire website.

LCC believes that growth should be directed towards the most sustainable settlements in South Holland. There is too large a disparity between Spalding (Sub-Regional Centre) and the most sustainable town identified in the Sustainability Study (June, 2015) which is Holbeach (Main Service Centre). Holbeach is anomalous in that it significantly outperforms (in aggregate) all other settlements in SE Lincolnshire (excluding Boston and Spalding) in terms of employment, services and facilities. In order to deliver new infrastructure and affordable housing for Holbeach

## Officer Comment:

The comment is noted.

## Officer Recommendation:

### Cowbit

Cowbit is a well delineated settlement. If it was moved down to the Other Service Centres and Settlements, where no site allocations were made and infill within the settlement boundary was permitted, the number of dwellings provided in Cowbit would be no fewer. This is because most sites are within the built up area and on land which is brown field and cannot be described as countryside. Therefore, moving dwellings to Holbeach would not occur. There would be duplication instead

### Deeping St Nicholas

The amount of housing is considered appropriate for the size of the village. Deeping St Nicholas is not geographically linked to Holbeach and thereby moving housing numbers between the two is not appropriate

### Gedney Church End

Gedney Church End should be re-categorised as Other Service Centres and Settlements and along with Gedney Black Lion End named 'Gedney' and shown on one map. As a result no sites will be allocated. Infill development within the settlement boundary would be acceptable. The development boundary has been drawn across Ged025 to link the rear boundaries of those properties that front Tops Gate and Church End so that it does not adjoin the curtilage of the Church.

### Gedney Hill

Gedney Hill is part of a cluster of villages and provides services for them: retail, school and some employment. It is far from Holbeach and relocating residential to Holbeach would not support the local services required

and its environs, more development should be targeted on suitable sites adjacent to the town. The proposed housing target for Holbeach is too low at 1,340. An increased figure of 2,050 is preferred as a means of accommodating major sites identified in the proposed site options of the draft Local Plan. This would be achieved by eliminating housing provision from the least sustainable settlements (all Minor Service Centres) listed in Policy 12 which (in order of least sustainable) are:

Settlement Name Sustainability Score Housing Target

Gedney Church End 28 80

Gosberton Risegate and Clough 35 40

Gedney Hill 38 80

Cowbit 44 80

Deeping St Nicholas 48 80

Tydd St Mary 51 200

Moulton Chapel 54 150

Total 710

Holbeach 223 1340 + 710 = 2050

The revised target of 2,050 dwellings for Holbeach should accommodate the following sites:

Site Hob 002 ("Manor Farm") 900 dwellings

Site Hob 048 839 dwellings

The combined capacity of these two sites is 1,739 dwellings. Adopting a target of 2,050 dwellings would also allow the allocation of smaller sites in addition to Hob 002 and Hob 048, thereby promoting a range of site sizes, choice and spreading of risk in delivery.

Hob 002 has the benefit of planning permission and the ability to make a significant financial contribution to improvements to Peppermint Junction and delivery of a new primary school on site.

Hob 048 is currently allocated in the existing South Holland Local Plan (2006) and is important in providing funding to allow access from a new roundabout on the

by nearby lower order settlements.

The support for Gedney Hill's proposed housing requirement of 80 dwellings is welcome. However, an increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.

Consequently it is considered that a change to Gedney Hill's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036.

Gosberton Risegate and Clough

It is considered that Gosberton Risegate and Clough should be re-categorised as Other Service Centres and Settlements. However, it is not agreed that the housing allocation should go to Holbeach. It would be more appropriate to add it to Gosberton.

Moulton Chapel

Moulton Chapel, as it currently is, resulted from allocations in the 1998 Local Plan. The 2006 Local Plan did not make further allocations. The approach is based on the previous growth the village has accommodated; the facilities it has, which are similar to other minor villages; public transport provision, which scores in the centre of the other settlements; employment, which with six other settlements scores better than all the others for self containment; and flood risk, which is in Flood Zone 1. The Local Plan will be accompanied by an Infrastructure Delivery Plan, which will identify what needs to be improved, by whom and when. However,

A151 to the proposed Food Enterprise Zone (FEZ) adjacent to Peppermint Junction. It is noted that para. 5.2.4 of the draft Local Plan states that "At this stage many more options for housing sites have been identified than are required to deliver the housing numbers identified in Policy 12." Reference to the "Housing Paper" should be corrected here and elsewhere, as in fact there is a Housing Paper for each of the 32 settlements in the top three tiers. Whilst acknowledging that these provide a thorough assessment of the strengths and weaknesses of each site and the total capacity in each settlement it is understood that sites were only ruled out if they were not "assessed as deliverable or developable, or are undevelopable only as a consequence of availability issues". This leaves many sites as options for consultation at this stage which have the "highest level of flood risk" and/or in some cases fundamental highway or other infrastructure constraints. The views of the Environment Agency, LCC as Highway Authority and commissioner of other services, and a range of other infrastructure providers will be crucial in refining the site options down to proposed allocations in preparing the Publication Draft Local Plan. As there is no readily available summary of the scale of over-provision at this stage, LCC have drawn up the following table covering the top two tiers: Sub-Regional Centres and Main Service Centres, in which most of the numerical over-provision is concentrated.

Settlement	SHLAA developable sites	capacity	Total site options	capacity	Revised housing target	Completions 2011-2015	ments 21st April	Residual requirement	Surplus capacity
Boston	13,408	22,990	5,900	350	1,755	3,795	19,195		
Spalding	24,518	19,553	5,720	530	2,960	2,230	17,323		
Holbeach	3,125	2,242	1,340	68	166	1,106	1,136		

based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to slightly reduce the number of dwellings proposed in Moulton Chapel.

Owing to these comments it is considered that a change to Moulton Chapel's housing requirements is required and the Local Plan should identify housing allocations in Moulton Chapel for 130 dwellings between April 2011 and 31st March 2036.

## Tydd St Mary

1. The responses are concerned about the proposed housing target of 200 and its impact on the character of the village and the ability of services and facilities to cope.

2. All the sites are in flood zone 3a and the three sites Tyd003, Tyd006 and Tyd008 have no hazard for flood hazard and depth. The Environment Agency has said a classification of 'no hazard' may not be correct. However, they do also say that there is no apparent hazard from tidal/fluvial sources. The two IDBs do not advise of serious problems. They would therefore, be the sequentially appropriate sites.

3. However, Tyd003 and Tyd008 affect the character of the conservation area. Historic England raise this issue and advise further investigation is required. Tyd008 is hedged but nonetheless its development affects the open character of the junction of Rectory Road and Common Way. Tyd006, owing to its scale, has a significant impact on the character of Rectory Road, which runs down the edge of the conservation area. This is ameliorated by a belt of trees along the road side, but the views out into the countryside will change.

4. The comments relating to the school capacity are supported by the County Education department. Some

Crowland 673 594 380 49 65 266 328  
Donington 904 728 380 38 65 277 451  
Kirton 1,313 732 500 2 173 325 407  
Long Sutton 1,177 1,040 580 46 163 371 669  
Pinchbeck 280 274 190 50 22 118 156  
Sutterton 555 362 300 3 19 278 84  
Sutton Bridge 441 431 180 19 28 133 298  
Swineshead 674 803 400 6 39 355 448

It can be seen that the current scale of over-capacity is huge, especially in Boston and Spalding. The capacity in the SHLAA (as updated to January 2016) is generally higher still, but there is no apparent explanation of why in Boston only it is much lower than the site options put forward. In most settlements, however, relatively little SHLAA capacity has been ruled out at this stage. This makes it very difficult to comment on the specific implications for a wide range of infrastructure until firmer site allocations are drawn up.

comments refer to sewerage capacity issues. Anglian water advise that Tyd003 and Tyd008 require the foul sewerage network to be upgraded but Tyd006 and Tyd014 would not. As Tyd006 would be an in cohesive extension to the village without Tyd003, this suggests that Tyd014 would be the best site for sewerage and the reduced numbers would assist with the impact on the primary school.

5. Tyd014 has a flood hazard of Danger for some and a flood depth of 0.25-0.50m. Anglian water has advised that surface water network capacity has major constraints and all sites should seek to reduce flood risk and incorporate Sustainable Drainage Systems. The surface water flooding maps suggest surface water flooding on this site is no worse than elsewhere. Owing to the recent development close to this site to the north and east, development would be more in character with the location, than development along Rectory Road. Also Low Gate has been improved in this location and so highway costs would be lower.

Owing to these comments it is considered that a change to Tydd St Mary's housing requirements is required and the Local Plan should identify housing allocations in Tydd St Mary for 40 dwellings between April 2011 and 31st March 2036.

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

ID1: 630 comment\_author: Barton Willmore

comment content:

Given the sustainability credentials of Crowland (including the established public transport links) it can be considered as a suitable location to accommodate a significant proportion of new dwellings and enhance the sustainability of the Main Service Centre... This Main Service Centre is capable of providing over and above the proposed allocation of 380 dwellings.

Officer Comment:

The scale of housing growth proposed for Crowland took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; population and household projections, current demand from the market and the local availability of land at lower risk of flooding. In this case the evidence indicates that Crowland is able to accommodate at least 500 dwellings rather than the 380 dwellings previously identified. This should help sustain existing services, any more is likely to have an adverse impact on Crowland's infrastructure and services.

Officer Recommendation:

Increase Crowland's housing target to 500 in Policy 12.

ID1: 631 comment\_author: Mr Peter Sanders

comment content:

I am strongly opposed to your proposal to put 4000 houses in Pinchbeck to finance the first portion of what is intended to be a western relief Road for Spalding without any idea and timescale for it to be connected to any road other than the B1356 Spalding Road.

Officer Comment:

The target provision of approximately 4000 dwellings will not be achieved without constructing a second access to the site from the A151 Bourne Road.

Officer Recommendation:

Proposed Policy 12: Vernatts Sustainable Urban Extension in the Draft Publication version of the Local Plan is approved.

ID1:

632

comment\_author:

Campaign to Protect Rural Englan

comment content:

The Councils appear to discount the evidence of the Lincolnshire Coastal Management Plan and Environment Agency which suggest that new development should not take place over much of the plan area as a result of potential flood risk within the lifetime of proposed housing allocations. Sustainable communities depend on a wide range of influences only a few of which are within the direct control of the Plan. Much of the Plan area is for example rural and ill served by public transport. Further erosion of transport subsidy by the County Council, as is a distinct possibility over the life of the Plan will, other things being equal, result in increased isolation for those without access to other means of transport from places of work, entertainment, shopping and health services. A greater focus of new housing around transport hubs as suggested in the NPPF review would help ameliorate this, recognising though that a bus stop in itself does not constitute a hub! Several of the proposed housing sites in the plan are in settlements without a bus stop or within reasonable walking distance of a bus stop which puts into question the sustainability of those proposed allocations. Development of these sites without a sustainable transport solution will impact on the stratification of households on the site and potentially impact on future social cohesion. Allied to the above, the vision seeks to deliver the housing, employment and other needs of the whole population, but it is apparent from the distribution of proposed employment and housing sites that they are not necessarily where the jobs or housing is or will be needed to generate truly self-sustaining communities. This therefore largely defeats a principal tenet of the

Officer Comment:

1. The responses are concerned about the proposed housing target of 200 and its impact on the character of the village and the ability of services and facilities to cope.
2. All the sites are in flood zone 3a and the three sites Tyd003, Tyd006 and Tyd008 have no hazard for flood hazard and depth. The Environment Agency has said a classification of 'no hazard' may not be correct. However, they do also say that there is no apparent hazard from tidal/fluviial sources. The two IDBs do not advise of serious problems. They would therefore, be the sequentially appropriate sites.
3. However, Tyd003 and Tyd008 affect the character of the conservation area. Historic England raise this issue and advise further investigation is required. Tyd008 is hedged but nonetheless its development affects the open character of the junction of Rectory Road and Common Way. Tyd006, owing to its scale, has a significant impact on the character of Rectory Road, which runs down the edge of the conservation area. This is ameliorated by a belt of trees along the road side, but the views out into the countryside will change.
4. The comments relating to the school capacity are supported by the County Education department. Some comments refer to sewerage capacity issues. Anglian water advise that Tyd003 and Tyd008 require the foul sewerage network to be upgraded but Tyd006 and Tyd014 would not. As Tyd006 would be an in cohesive extension to the village without Tyd003, this suggests that Tyd014 would be the best site for sewerage and the reduced numbers would assist with the impact on the primary school.
5. Tyd014 has a flood hazard of Danger for some and a

Officer Recommendation:

Due to these comments it is considered that a change to Tydd St Mary's housing requirements is required and the Local Plan should identify housing allocations in Tydd St Mary for 40 dwellings between April 2011 and 31st March 2036.

vision.

Re: Tydd St Mary - Tydd St Mary in South Holland has proposed allocations for 200 new dwellings but has very limited services available locally with most services at least 4 miles away, there is no regular bus service and no significant local industry, especially not within the 400m radius suggested in the Plan. The proposal would irrevocably change the character of one of the more attractive villages of SE Lincolnshire, doubling the number of dwellings at the heart of the community and increasing the population by 50%. The population increase is unlikely to be insufficient to sustain additional local services which calls into question the logic of stepping outside the generality of the principal of sustainable development to propose housing in a location that ostensibly fails to meet the test.

flood depth of 0.25-0.50m. Anglian water has advised that surface water network capacity has major constraints and all sites should seek to reduce flood risk and incorporate Sustainable Drainage Systems. The surface water flooding maps suggest surface water flooding on this site is no worse than elsewhere. Owing to the recent development close to this site to the north and east, development would be more in character with the location, than development along Rectory Road. Also Low Gate has been improved in this location and so highway costs would be lower.

ID1: 633 comment\_author: iba planning

comment content:

Whilst Policy 11 (Meeting Objectively Assessed Housing Needs) confirms that provision will be made for a net increase of at least 18,250 dwellings in South-East Lincolnshire, the local authority split is given as a fixed, rather than minimum, requirement. Similarly, Policy 12 (Distribution of New Housing) confirms the future housing requirement for Crowland to be 380 dwellings “again a fixed, rather than minimum, requirement. Given that the objectively assessed housing need is a minimum one, it is suggested that the housing splits for the two local planning authorities and individual settlements are similarly identified as a minimum requirement in the interests of consistency and for the avoidance of any doubt. Allied to the above it is suggested that sufficient land is allocated to meet the minimum housing requirement for the period 2011-2036, with housing windfall sites being permitted within the settlement boundary to introduce a level of flexibility to the Plan (as is good practice). To remedy the above objection at this stage: - the housing splits for the Local Planning Authorities and individual settlements should be identified as a minimum requirement in the interests of consistency and for the avoidance of any doubt. In the absence of the above amendments, my client s objection to the draft Plan will remain.

Officer Comment:

The overall housing provision is stated as "at least". That specific numbers are stated per Local Authority and for specific settlements is to aid how the Local Plan demonstrates where the growth could take place and provide a context for the assessment of sites. Windfall, infill and rural exceptions sites provide further flexibility.

Officer Recommendation:

No change to the approach of the Local Plan is recommended

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

ID1:

634

comment\_author: Larkfleet Homes

comment content:

It is noted that over half (64%) of the proposed housing allocations are in Boston and Spalding. It is important that the JPU's proposed housing distribution recognises the difficulties facing rural communities not just in regard to housing supply and affordability issues, but also the need to help safeguard existing facilities such as schools, pubs and shops, which are struggling to survive in many rural areas. The NPPG emphasises this need in paragraph 55 when it states 'to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities'. It is suggested that the JPU reconsiders if too great a proportion of development is proposed in the urban areas as it is vitally important that the proposed distribution of housing meets the housing needs of rural communities as well as those of the urban areas.

It is noted that a Five Year Housing Land Supply (FYHLS) will be calculated separately for each authority. The latest reports show that neither authority has a five year supply. The current position is 2.7 years in Boston and 3 years in South Holland respectively. If the FYHLS is to be calculated separately as proposed it is suggested that Policy 2 and Policy 12 should set out the settlement hierarchy and distribution of development by authority separately. It is suggested that more sites are allocated so there is certainty that each Council has a five year supply on adoption of the SELLP and beyond. When allocating sites the JPU should be mindful that to maximise housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to

Officer Comment:

The emerging Plan directs 21.3% of the Borough's new housing to rural settlements, despite the evidence provided by the Boston Borough Council Strategic Housing Market Assessment (July 2015) that only 15.4% of the Borough's housing needs (2011-2036) will arise in these settlements. Thus, it is considered that the Plan already seeks to address the issues raised by the objector, and it is not accepted that a reduction in the town's housing requirements is justified.

It is not agreed that policies 2 and 12 need to be re-written to set out separate settlement hierarchies for Boston Borough and South Holland – a single Plan is being produced for the two local authority areas and it is therefore appropriate for a single hierarchy to be set out. It is, however, agreed that the allocation of a wide range of sites (including many smaller sites) is desirable.

Officer Recommendation:

No change to Boston's housing requirement is necessary.

No change is necessary.

suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else being equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

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ID1: 635 comment\_author: Lincolnshire County Council

comment content:

Public Health Comments It is clear that much of the planned housing for Spalding is linked to the Sustainable Urban Extension but there seems to be a lack of similar master planning for Boston and Holbeach. It is important to consider the cumulative impact and consistency of approach across a number of smaller sites within a locality.

Officer Comment:

Boston, in the context of urban extensions and other sites has a different set of circumstances to Spalding. The two urban extension sites for Boston are in single ownerships. That being said a masterplanning approach to these, and other sites, will be taken in directing the delivery of development and key infrastructure.

There are two large scale extensions to Holbeach planned; Hob002 has outline planning permission and the design of that site and any impacts will be addressed through the reserved matters process; Hob048 has outline planning permission subject to a S106 agreement, and while details are expected to be addressed through the reserved matters process a new policy will be added to the Local Plan to set out the framework within which development should take place. A masterplan will also be required for this site. This should help address any adverse impacts identified. Any cumulative impacts from all the allocations in Holbeach will be considered through the Infrastructure Delivery Plan and reflected in relevant policies in the next version of the Local Plan.

Officer Recommendation:

That masterplanning should be emphasized within the Local Plan as a approach to delivering development on key sites.

Hob002 and Hob048 are some of the more suitable Potential Housing Sites in Holbeach and should be taken forward as Preferred Option Housing Allocations. Add new policy to provide the framework for the delivery of Hob048.

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

ID1: 636 comment\_author: Anglian Water Services Ltd

comment content:

Anglian Water has previously commented on the housing sites identified in the Council's SHLAA in relation to water and water recycling infrastructure capacity based upon the information provided by the Councils at the time. These comments are summarised in the Council's Housing Papers as part of this consultation. It is unclear whether the Local Plan will include specific allocation policies for the sites outlined in the Housing Papers. If this is the case we would suggest that the development criteria include reference to any site related issues relating to water and water recycling infrastructure capacity.

Officer Comment:

The Local Plan has policies that address the assessment and provision of such resources and infrastructure. A masterplanning approach to key sites will also assist in delivering development and infrastructure.

Officer Recommendation:

That masterplanning should be emphasized within the Local Plan as a approach to delivering development on key sites.

ID1: 637 comment\_author: Long Sutton Parish Council

comment content:

The parish council and residents feel that there should be no further large developments in the town because of the continued strain on the infrastructure. Large developments and ECO developments are not compatible with Long Sutton which is a historic Georgian Town and any developments should be small and in keeping with the town and its environs.

Officer Comment:

Small and larger scale housing sites are required to ensure that a mix of house types and tenures can be delivered across the plan period. This will also cater for demand from national and local housebuilders and for self build. It should be possible through good design to ensure that new housing sites (small or large) can complement the character of Long Sutton and integrate with the existing built form.

Officer Recommendation:

No change required.

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

ID1: 638 comment\_author: Mr Stephen Flett

comment content:

The focus of growth at Spalding is supported.

Officer Comment:

The support is welcomed.

Officer Recommendation:

No change to the approach is required.

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

ID1: 639 comment\_author: Waller Planning

## comment content:

Holbeach The Sustainability of Settlements Study has shown that Holbeach is the most sustainable location for development outside of Spalding and Boston, with a significantly higher score than the next most sustainable location, Long Sutton (173 compared to 132). It is also around double the size of the next largest settlements (Pinchbeck and Kirton). This means that Holbeach effectively sits between the quite disparate categories of Sub-Regional Centre and Main Service Centre. It has the potential to play a greater role in the functionality of South Holland as a District than merely to serve a relatively small local catchment. Holbeach already benefits from a good range of employment, including the University of Lincoln's National Centre for Food Manufacturing, and now the proposed new Food Enterprise Zone. It therefore has the potential to provide a range of types of job, which are not typically found in many other parts of South Lincolnshire. We have explained in our representations regarding Policy 7 that Ashley King Developments are taking an active role in supporting the diversification and growth of the local economy. However, in order to achieve this, it is necessary to provide an adequate supply and range of housing close to sources of employment, which will greatly improve the prospects for the success of new employment proposals, as well as creating sustainable commuting patterns, bringing housing and employment closer together. This will also be of great benefit to existing businesses in the town. The Spatial Strategy Background Paper notes (at paragraph 6.7) that, whilst Holbeach is of a different scale to most settlements, it's current role is akin to the other settlements in the Main Service Centre category.

## Officer Comment:

Holbeach  
It is not considered that the comments made by consultees justify a change to Holbeach's housing requirements. However a slight increase in the housing requirement is considered necessary to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Consequently it is considered that a change to Holbeach's housing requirements should be made, and that the Local Plan should provide for 1,420 dwellings between 1st April 2011 and 31st March 2036.

Cowbit  
The scale of housing growth proposed for Cowbit took account of the most up-to-date information on migration rates;  
However, a slight increase in the housing requirement is considered necessary as a result of the discussion in Sections 5 and 6 of the Housing Paper to deliver a better form of development on each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period.  
Owing to these comments it is considered that a change to Cowbit's housing requirements, is required and the Local Plan should identify housing allocations of 120 dwellings between April 2011 and 31st March 2036.

Crowland  
The support for Crowland's proposed housing requirement of 380 dwellings is noted. However a slight increase in the housing requirement is considered necessary to deliver a better form of development on

## Officer Recommendation:

Holbeach.  
A change to the Policy is recommended.

Cowbit.  
A change to the Policy is recommended.

Crowland.  
A change to the Policy is recommended.

Moulton.  
A change to the Policy is recommended.

Swineshead.  
No change is required to Swineshead's housing requirements.

However, we believe that the Local Plan should be looking to plan for a more sustainable future, and it should not simply reflect past trends. We believe that the new employment opportunities in the town, coupled with its already far greater range of services and facilities, provide an opportunity to create a more self-contained and sustainable town for the future. New development in Holbeach can lead to a regeneration of its town centre, by creating additional demand for shops and facilities. Over time it can also increase choice and variety within the town centre, and help to sustain and grow current success stories, such as the street market. Given the town's central location within South Holland District, additional facilities here also have the potential to reduce the need for people to travel to higher order settlements such as Spalding. This could therefore have the effect of making development in other nearby settlements more sustainable than would be the case if residents needed to travel further to Spalding or elsewhere for employment or comparison retail. Given this, we believe that the amount of housing which is to be provided in Holbeach should be increased. The proposed level of 1,340 dwellings actually represents a small decrease when compared with the average scale of development in the preceding years (1976-2011); during these years there was an average of 57 dwellings built each year, but the proposed new Local Plan housing target for the town would represent only 53 dwellings per annum. A more suitable target would be one which accepted that a step-change in growth can provide a more self-contained and sustainable settlement for the future. We therefore suggest that the housing target for Holbeach should be increased by at least 25%, to 1,675 dwellings. As we explain in our separate representations concerning potential housing

each site and to help deliver the infrastructure necessary to support viable, sustainable development over the plan period. Consequently it is considered that a change to Crowland's housing requirements should be made, and that the Local Plan should provide for 500 dwellings between 1st April 2011 and 31st March 2036.

#### Moulton

The support for Moulton's proposed housing requirement of 190 dwellings is noted. However, based on the dwelling capacity of the sites available, and the site specific issues discussed in Section 5 it is considered that the Local Plan should seek to reduce the number of dwellings proposed in Moulton.

#### Swineshead

The scale of growth proposed for Swineshead took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements and their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the availability of land at lower risk of flooding. The objection does not seek to address any of these issues, and does not set out any substantive arguments to justify an increase

sites in Holbeach, this level of housing is certainly deliverable. We have also commented separately on the overall level of housing provision proposed, which we believe is inadequate, largely because it is based on a continuation of a recessionary trend. We suggest that the overall housing target should be increased, and we believe that Holbeach is a suitable location to accommodate a proportionally larger increase than the other settlements within the Plan area, due to its being the most sustainable location for development outside the Sub-Regional Centres.

Re: Cowbit We note that Cowbit is less constrained by flood risk than many other similarly sized and larger settlements, and that it has also been shown to be a sustainable location for new development. Cowbit has some good local facilities, such as a local primary school and community hall, which serve its existing population, and also a good bus service due to its proximity to Spalding. These services and facilities can only be maintained in future through the provision of new housing, which will create continued demand. In this context, we support the draft Local Plan's provision of at least 80 new dwellings in Cowbit, although as we explain in our representation concerning Policy 11, we believe that a higher level of housing is required to meet the needs of South East Lincolnshire, and so the target for Cowbit should also be increased proportionately.

Re: Crowland Crowland has scored well in terms of its sustainability as a location, due to its good range of facilities. It serves an important role as a service centre to its population and that of the surrounding rural area. This role can only be maintained in future through the provision of new housing, which will create continued

demand for the services and facilities within the town. In this context, we support the draft Local Plan's provision of at least 380 new dwellings in Crowland, although as we explain in our representation concerning Policy 11, we believe that a higher level of housing is required to meet the needs of South East Lincolnshire, and so the target for Crowland should also be increased proportionately.

Re: Moulton We note that Moulton is less constrained by flood risk than many other similarly sized and larger settlements, and that it has also been shown to be a sustainable location for new development. Moulton has scored well in terms of its sustainability as a location, due to its good range of facilities. It scored 71 in the Sustainability of Settlements Study, a score which was only a little lower than some of the Main Service Centres. Moulton serves an important role as a service centre to its population and that of the nearby rural area. This role can only be maintained in future through the provision of new housing, which will create continued demand for the services and facilities within the town. In this context, we support the draft Local Plan's provision of at least 190 new dwellings in Moulton, although as we explain in our representation concerning Policy 11, we believe that a higher level of housing is required to meet the needs of South East Lincolnshire, and so the target for Moulton should also be increased proportionately.

Re: Swineshead We note that Swineshead, in particular amongst the settlements within Boston Borough, is less constrained by flood risk than many other similarly sized and larger settlements, and that it has also been shown to be a sustainable location for new development. Swineshead has scored well in terms of

its sustainability as a location, due to its good range of facilities. It serves an important role as a service centre to its population and that of the surrounding rural area. This role can only be maintained in future through the provision of new housing, which will create continued demand for the services and facilities within the town. In this context, we support the draft Local Plan's provision of at least 400 new dwellings in Swineshead, although as we explain in our representation concerning Policy 11, we believe that a higher level of housing is required to meet the needs of South East Lincolnshire, and so the target for Swineshead should also be increased proportionately.

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ID1: 640 comment\_author: Steven Ball

comment content:

Tydd st Mary is beautiful village with a lot of heritage, history and conservation areas (like many other lincolnshire villages you are also planning to ruin in the county) and our close knit community generally chose to live here for that very reason. We have already received our share of development in recent years with the construction of the Kiln drive estate which is comprised of 60+ properties. Something I think you have (conveniently) failed to mention on your website documents. I believe that there is not a shortage of houses in England, just too many people, but that s a different issue. I would suggest that if you really feel the need to construct, I recommend that you expand local towns where people are used to a larger community and where there is already infrastructure i.e. Suitable roads, services, amenities, schools, sewage systems etc, unlike our picturesque Hamlet you are planning to blight with modern properties which will obscure the beautiful rural views that we enjoy.

Officer Comment:

1. The responses are concerned about the proposed housing target of 200 and its impact on the character of the village and the ability of services and facilities to cope.
2. All the sites are in flood zone 3a and the three sites Tyd003, Tyd006 and Tyd008 have no hazard for flood hazard and depth. The Environment Agency has said a classification of 'no hazard' may not be correct. However, they do also say that there is no apparent hazard from tidal/fluviial sources. The two IDBs do not advise of serious problems. They would therefore, be the sequentially appropriate sites.
3. However, Tyd003 and Tyd008 affect the character of the conservation area. Historic England raise this issue and advise further investigation is required. Tyd008 is hedged but nonetheless its development affects the open character of the junction of Rectory Road and Common Way. Tyd006, owing to its scale, has a significant impact on the character of Rectory Road, which runs down the edge of the conservation area. This is ameliorated by a belt of trees along the road side, but the views out into the countryside will change.
4. The comments relating to the school capacity are supported by the County Education department. Some comments refer to sewerage capacity issues. Anglian water advise that Tyd003 and Tyd008 require the foul sewerage network to be upgraded but Tyd006 and Tyd014 would not. As Tyd006 would be an in cohesive extension to the village without Tyd003, this suggests that Tyd014 would be the best site for sewerage and the reduced numbers would assist with the impact on the primary school.
5. Tyd014 has a flood hazard of Danger for some and a

Officer Recommendation:

Due to these comments it is considered that a change to Tydd St Mary's housing requirements is required and the Local Plan should identify housing allocations in Tydd St Mary for 40 dwellings between April 2011 and 31st March 2036.

flood depth of 0.25-0.50m. Anglian water has advised that surface water network capacity has major constraints and all sites should seek to reduce flood risk and incorporate Sustainable Drainage Systems. The surface water flooding maps suggest surface water flooding on this site is no worse than elsewhere. Owing to the recent development close to this site to the north and east, development would be more in character with the location, than development along Rectory Road. Also Low Gate has been improved in this location and so highway costs would be lower.

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

ID1: 641 comment\_author: Mrs S Scorthorne

## comment content:

Gedney has very limited facilities, comprising of a bus service, a primary school, Church, village hall and a pub. Within the draft Local Plan is a schedule of sustainability credentials. Gedney Church End has a sustainability credential score of 28 which is the lowest amongst all of the 21 Minor Service Centres. Surely it makes sense to redistribute at least some of the 80 dwellings proposed for Gedney to one of the Main Service Centres, for example, nearby Long Sutton which has a sustainability credential score of 171. The population of the parish of Gedney was 2304 as at the 2011 census. As far as I am aware no properties have been built in the Parish since 2002 therefore the figure of 2304 probably represents the current population of the village. The figure of 2304 includes the population of the villages of Gedney Dawsmere, Gedney Drove End, Gedney Dyke and rural areas such as Gedney Marsh and Gedney Fen. It is not unreasonable to assume the population of Gedney Church End which is the area under consideration amounts to not more than about 350 (maximum of about 150 dwellings within the area defined by Inset Map No.17, multiplied by an occupancy rate of say 2.2). 80 new dwellings as proposed equates to a population increase of about 192 (based on an occupancy rate of 2.2 persons per dwelling). THIS REPRESENTS A POPULATION INCREASE DURING THE PLAN PERIOD OF AROUND 55% - 60%. I doubt very much if an increase in population of this magnitude is envisaged in Boston, Spalding or any of the Main Service Centres. It is untenable and grossly unreasonable. The proposed provision of 80 new dwellings must be reduced to a more appropriate figure. I am told developers will

## Officer Comment:

The comment is noted.

## Officer Recommendation:

Gedney Church End should be re-categorised as Other Service Centres and Settlements and along with Gedney Black Lion End named 'Gedney' and shown on one map. As a result no sites will be allocated. Infill development within the settlement boundary would be acceptable. The development boundary has been drawn across Ged025 to link the rear boundaries of those properties that front Tops Gate and Church End so that it does not adjoin the curtilage of the Church.

consider a development of 80 dwellings as proposed by GED023 in a village with very limited facilities TOO large to contemplate. The best way of achieving more manageable growth is to remove GED023 from consideration.

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ID1:

1728

comment\_author: Environment Agency

comment content:

Housing Papers General comment: We note from the Housing papers that you are proposing 'options' for sites to come forward to meet housing need, where the level of flood hazard across the settlement varies. For example, in:

Kirton there is a residual requirement for 309 dwellings and it appears that there is adequate capacity in sites with a hazard classified at 'Danger for some' to accommodate this need. However, the option of 3 further sites classified as 'Danger for most' is put forward. If there are developable sites to accommodate the housing need in areas of lower flood hazard these should be allocated first, in order to accord with the NPPF Sequential Test of directing development away from areas at highest risk.

Weston states that the flood hazard for Wsn003 is 'Danger for some' but says it has the lowest flood risk. We appreciate that this site is at the lowest probability of flooding, i.e. flood zone 1. However, it is at a higher flood hazard, i.e. 'Danger for some' as opposed to other sites, which have no hazard. Although the NPPF states that development should be directed 'to areas with the lowest probability of flooding' (paragraph 101), the NPPG advocates using the Strategic Flood Risk Assessment to apply the Sequential Test (Paragraph 22). The SFRA refines the information on flood risk to sites and considering the future hazard classification, during the Sequential Test, will lead to a more appropriate site selection process. It is our opinion that it is misleading to state that Wsn003 is sequentially preferable to some of the other sites on flood risk grounds, as although it lies in flood zone 1, it would be subject to depths and velocities in 100 years time,

Officer Comment:

The "options" stage of site selection will inevitably put forward sites that have differing strengths and weaknesses across a number of considerations. Whilst Flood Risk is a significant consideration it cannot be the overriding factor as the Local Plan will be assessed on how it meets the needs (specifically housing needs) of the area. As the Housing and other background papers explain the choices in south East Lincolnshire are constrained by many factors and a balance will need to be struck.

Officer Recommendation:

No change to the Plan is recommended.

which place it in the 'Danger for some' category. Pinchbeck, Surfleet & Crowland. Thank you for highlighting in the Housing Papers that the Strategic Flood Risk Assessment for these settlements is currently being updated and that the hazard classification may change as a result of this. It is important for the consideration of the flood risk Sequential Test that the updated information, when available, is used. This information is also important for informing the Exception Test, which may affect the viability of some sites due to mitigation requirements.

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ID1: 1730 comment\_author: Longstaffs

comment content:

2. We consider the proposed Policy 12 , which provides for 5,720 new housing site allocations for the village, in the plan period 2011-2036, (reduced from 7,450 to reflect the Peterborough Sub region Strategic Housing market assessment – 2015 update, as this report showed housing requirements of 430 dpa (dwellings per annum) for the district (the 2014 SHMA had previously indicated housing numbers of 560 dpa for the South Holland area)), should have a great degree of flexibility in the number of new housing allocations.

We consider if numbers swing by the 25% range as seen above, it may give rise to further allocations being required if the figures shown in the existing Objectively assessed Housing need (OAHN), are increased in another review of the SHMA.

We also consider current immigration increases in the District and the recently published National survey indicating a need for better integration of immigrants, will, over time, lead to distribution out from the Sub regional centres to the larger village settlements, and therefore housing allocation number increases could be required for the district.

Officer Comment:

The support is welcomed. However, a slight increase in the housing requirement is considered necessary, following consideration of the potential housing sites (see Section 5), and site specific issues, primarily to enable a more appropriate form of development to be achieved and strategic infrastructure delivered through viable development schemes. Consequently it is considered that a change to Spalding’s housing requirement should be made, and that the Local Plan should provide for 5,880 dwellings between 1st April 2011 and 31st March 2036.

Officer Recommendation:

Increase the Spalding housing allocation to 5880.

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Post\_title: **5.3 A Sustainable Urban Extension for housing in Spalding**

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ID1: 642 comment\_author: Mr & Mrs J S Wright

comment content:

Before any building of houses on stage A (Pin045) is undertaken there must be provision for an exit onto Market Way so that the businesses in Pinchbeck Village Centre are not penalised because of limited access. The site highlighted is after all in PINCHBECK and should not become a satellite of Spalding. The relief road through Pin 024 should be completed to Bourne Road A151 before residential building so that there is an access at both ends. This should avoid more congestion at proposed R1 roundabout (Spalding Road Pinchbeck) which already has excess traffic into Spalding Town.

Officer Comment:

At this point in time, the vehicular access into the first stage of the housing development will be via the proposed roundabout R1. Any direct links with Market Way will be explored later through the master-planning process. It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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

ID1: 643 comment\_author: Jacqui Woods

## comment content:

Flooding is a thing of the past so far in Spalding and the surrounding area thanks to the Coronation Channel. (The people who invented and implemented this deserve our immense thanks). However, I do not know the flood position regarding the area around the Vernatts Drain. The plan appears to recommend a large number of residential dwellings be built in this area together with a major new roundabout and road system. I understand that the road is for access of the dwellings but where will it actually lead to - eventually to the by-pass or have I got that wrong? And when? Will this prevent the intrusive, dangerous and unpleasant numbers of lorries heading directly for Pinchbeck village centre or, as I suspect, might that be worse as the road appears to go nowhere for some considerable time? The plan talks about Phase 3 for roundabout 3. This should be carefully considered as far as numbers of dwellings are concerned. Is there the sewerage infrastructure for example? Woolram Wygate is a large residential area already and this will largely be an extension. Schools for the increased number of children? Doctors surgeries? It is difficult enough at the moment to recruit new doctors to the area. It is worth remembering that if you make the area attractive to seasonal and migrant workers with housing etc., you will of course attract even more. This may not be a bad thing as long as employment is sustainable in the area. A mix of housing types is obviously of importance to deliver the need for all types of people but poor quality and rushed delivery needs to be guarded against. I lived until recently in a relatively poor, over developed area of Britain and have seen the effect that poor quality, jammed together, so-

## Officer Comment:

The comments on flooding are noted but, nevertheless, it is a necessary requirement of the Local Plan's preparation to have regard to the 'residual risk' of flooding, which remains significant not only in the Spalding area, but across a large part of South East Lincolnshire. The need to ensure the provision of the additional community and physical infrastructure to meet the needs generated by the housing growth will be addressed in the South East Lincolnshire Infrastructure Delivery Plan (IDP) which is being prepared. The housing mix of the new development along with other considerations relating to providing a sustainable, inclusive and mixed community will be supported by a number of Local Plan policies and the preparation of a master-plan for the site.

## Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

called affordable housing has on both the occupants and the surrounding area. It becomes un-cared for, quickly run down and a largely no-go area. This must not happen. It is also important to take into account any developmental traffic that will impact on town and local traffic during development of all this housing. There is very little rush hour traffic in Spalding and Pinchbeck. Keep it that way.

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

ID1: 644 comment\_author: Joyce Boyer

## comment content:

With my husband I visited Pinchbeck Village Hall on 13 January to view the local plan but came home feeling the exercise was a complete waste of time. The plans showing where possible housing development in Surfleet and two other areas to the north of Pinchbeck were a good size to see the locations but the entire village of Pinchbeck was shown so small on the main map and enlarged map on the table that it was almost impossible to locate where the possible sites were and for how many properties. The people we spoke to had no knowledge of Pinchbeck or its current transport problems so there could be no discussion as to how these could be solved in the near or long distance future. The entire emphasis of their answers to questions was based on a proposed road to no-where!! Starting at a new roundabout at Enterprise Way it might be built if there was a large housing development on land not shown as available on the smaller plan. As it was going no-where should there be any building all of the traffic would need to use Pinchbeck Road “ already busy - or cross the roundabout and travel through the industrial estate “ on busy, congested and not good roads - to the A16. If we are discussing a plan for the future there needs to be;- A road to take HGV s off of Knight Street, Pinchbeck “ a narrow road with school crossing that is a rat-run for lorries heading for Bourne and the A1. A relief road to the west of Spalding and Pinchbeck from the proposed new road in the south to join with the relief road from the A 16 at Surfleet (just north of the Crematorium). Once this is built “ preferably dual carriageway “ then the road to no-where that was being pushed at the meeting could join that and be a benefit to the area. Whilst I agree

## Officer Comment:

It is hoped that the completion of the SWRR, at least as far as the A151 Bourne Road, will help to mitigate some of Pinchbeck's current traffic problems. It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed. It is currently intended to plan for residential growth in a manner that seeks to preserve the separate identity of Pinchbeck.

## Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

that some additional housing is essential over the next 20 years A substantial green corridor should be kept between Pinchbeck and Spalding to enable the two areas to retain their different identities.

ID1: 645 comment\_author: Mrs E Whettingsteel

comment\_content:

It is noted that the proposed Spalding SUE is expected to provide 4,000 dwellings together with supporting community infrastructure. This constitutes an unbalanced approach to growth as a disproportionate level (37% of the total housing provision for South Holland within the plan period) is expected to be delivered, in a single location. Whilst the land at Spalding may provide a suitable and sustainable location for strategic housing growth, and may be delivered in the fullness of time, this proposal is reliant upon the delivery of the Spalding Western Relief Road (SWRR). The western relief road has yet to be scheduled and funded therefore the proposed expansion is not deliverable in the short-term. The fundamental fact is that the Council needs to have in its housing supply a range of site, of varying sizes and locations if the housing provision for the District is to be achieved. The Council should not, therefore, rely so heavily on the delivery of 4,000 in a single location. It is evident that the Councils have made a range of unrealistic and optimistic assumptions about the components of its housing land supply and has no contingency, or flexibility if one or more of these components is delayed, or fails to come forward.

Officer Comment:

The 4,000 dwellings attributed to the urban extension will be delivered over a number of years stretching some time beyond the end of the Local Plan period in 2036, and such a figure is required to support the funding of the SWRR. Within the Local Plan period, a number of varied sites will be allocated across Spalding to meet housing need. It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed in order to minimise the impact on the Spalding Road.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

ID1: 646 comment\_author: Cllr Sally Slade

comment content:

I am commenting on the plan for the whole of Spalding and also those for Pinchbeck and Surfleet. I have been to see the local plan exhibitions at both Pinchbeck and Surfleet. I have listened to residents' responses and to those of the planning officers, and I am disappointed by what I have seen. My concern is the proposal to build a large housing estate along the North side of the Vernatt's Drain between Pinchbeck and Spalding. I know that we need to provide for more housing and I know that we need, and want, a relief road to skirt round Spalding, and to take lorries away from the centre of Pinchbeck, but this plan does not reflect that desire. I feel that the relief road is not being shown as such, and until it is, we have a dead-end road into a housing estate. As shown, the road will bring thousands more cars on to the southern end of the Pinchbeck road and blight the route into town. I had hoped to see a road which would take the traffic out or round Spalding, and take the lorries to Bourne and to the A16, and away from Pinchbeck village. This is not shown here. I appreciate that this is an early phase of the plan, and that there may well yet be a route planned which connects the two parts of relief road shown here. I would have preferred the large housing development to be on the southern side of the town, where it would be near the new development at Lincs Gateway, as well as having easy access the A16 and thereby to Peterborough, Boston, the Deepings and Bourne.

Officer Comment:

It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed in order to minimise the impact on the Spalding Road. Areas to the south of Spalding have been investigated for housing but most of these tend to be more problematic from a flood-risk point of view.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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

ID1: 647 comment\_author: Longstaffs

## comment content:

we believe that most of the proposed Preferred housing site land, and the already consented Housing commitment land, is either under the control or influence of so few hands, we do not consider that it is in the best interest of planning policy generally, other house builders and land owners, that so much of what is being done, is within the control of so few. We believe that this is potentially contrary to Government Policy where there are directions to encourage a wider choice. We therefore see that the South east sector could and should be opened up at an earlier opportunity for potential development to run parallel with, and as another opportunity for third party developers (other than those who are so centrally involved already in so much of the land on the South west of Spalding) to have a potential to provide housing development in the Spalding district. By concentrating so much focus on development of an area controlled by so few on the west side of the town, depends on the motivation and ability for those developers to move things forward to achieve what the South East Lincolnshire Planning members have identified as being the desired road improvement for the west side of Spalding, The progress of the desired Spalding South Western Relief Road, is dependent on too few a number of land owners/developers, and Spalding could fall into the undesired position of having lots of land allocated, but no meaningful development. In terms of the relief road, if the southern phase is built, from Spalding Common through to Horsesh Road, it would do a lot to improve the traffic congestion in the town, but until it is completed from Spalding Common to Pinchbeck Road, the Western relief road cannot be a

## Officer Comment:

The emerging strategy of focussing housing growth to the north and west of Spalding has been influenced by the desire to fund the delivery of the SWRR as much as possible through developer contributions. In addition, these areas tend to be more acceptable in terms of seeking to avoid areas of significant flood risk. It is intended that the Local Plan proposals for Spalding will provide a variety of sites for development to met the Government's requirement to deliver a wide choice of high-quality homes.

## Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

relief to the whole of Spalding, and therefore deliverability of the full effect is very long term possibly 30-50 years. Surely before consideration is given to any more development on the north west of the town, the sections of the relief road to the south (Horsesh Road to Spalding Common), and north (Wygate Park to Pinchbeck Road) should be completed as a priority before any opening up of further tranches of land North/west of the Vernatts/Joint Railway Line, for housing development takes place in the area, otherwise all that will occur more traffic will be delivered onto the already congested Pinchbeck Road area, from the dwellings planned on these additional preferred housing sites. The allocation of Preferred housing sites as proposed in the Inset Maps north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside going west and south west of Spalding in this area is sensible going north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of a second area of Preferred Housing sites in the South east, to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of

development opportunities. Including land in the South eastern area may allow individual and smaller developers the chance of building to a different style rather than being controlled by so few developers. It is in close proximity to primary and secondary schools, doctors, and the town centre. Locationally, it is an obvious region to develop without the need for expensive infrastructure, being close to the A16 Bypass, skirting the eastern areas of the town. Whilst the site is in a flood risk area, all the land around Spalding is virtually the same level. The level at Spalding Common, and right round to north of the Vernatts is virtually the same as Clay Lake, but because the land in Cowbit Wash acts as a flood plain with a considerable area that would flood before Clay Lake, the South East Quadrant may be a better area. Carefully designed housing, with raised floor levels could all negate the issue of flooding. Additionally, the land in the Clay Lake area is a poorer grade of farmland than the Spalding Common, Horsesh Road and areas north/west of The Vernatts/Joint Railway Line.

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

ID1: 648 comment\_author: Longstaffs

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## Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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## Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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ID1: 650 comment\_author: Longstaffs

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## Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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ID1: 651 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

relief to the whole of Spalding, and therefore deliverability of the full effect is very long term possibly 30-50 years. Surely before consideration is given to any more development on the north west of the town, the sections of the relief road to the south (Horsesh Road to Spalding Common), and north (Wygate Park to Pinchbeck Road) should be completed as a priority before any opening up of further tranches of land North/west of the Vernatts/Joint Railway Line, for housing development takes place in the area, otherwise all that will occur more traffic will be delivered onto the already congested Pinchbeck Road area, from the dwellings planned on these additional preferred housing sites. The allocation of Preferred housing sites as proposed in the Inset Maps - north/west of The Vernatts/Joint Railway Line, is clearly taking development into a completely different area which has always been resisted in the past, for the reasons of reducing the segregation/separation between Spalding and Pinchbeck, and with the allocations already committed to the south west of Spalding, opening up this additional tranche is not necessary. Those allocations south west of Spalding should and could fund the new link from Spalding Road through to the Monkshouse Lane area without the need to open up another area of development into open countryside going west and south west of Spalding in this area is sensible going north and west of The Vernatts/Joint Railway Line into open countryside is not. We put forward the proposal that there should be a further allocation of a second area of Preferred Housing sites in the South east, to offer the opportunity and choice for developers, and indeed end users, and to further the aspirations of allocation and numbers in the Spalding district being achieved, which is not by any means guaranteed under the present prioritisation of

development opportunities. Including land in the South eastern area may allow individual and smaller developers the chance of building to a different style rather than being controlled by so few developers. It is in close proximity to primary and secondary schools, doctors, and the town centre. Locationally, it is an obvious region to develop without the need for expensive infrastructure, being close to the A16 Bypass, skirting the eastern areas of the town. Whilst the site is in a flood risk area, all the land around Spalding is virtually the same level. The level at Spalding Common, and right round to north of the Vernatts is virtually the same as Clay Lake, but because the land in Cowbit Wash acts as a flood plain with a considerable area that would flood before Clay Lake, the South East Quadrant may be a better area. Carefully designed housing, with raised floor levels could all negate the issue of flooding. Additionally, the land in the Clay Lake area is a poorer grade of farmland than the Spalding Common, Horsesh Road and areas north/west of The Vernatts/Joint Railway Line.

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

ID1:

652

comment\_author:

Pedals - Spalding's Cycle Action Gr

comment content:

Policy 13 Item v of the requirements for development proposals should be altered to clarify that the development should be designed to facilitate walking and cycling not only to key locations within the development area but also to locations nearby such as employment areas, schools, and shops. We suggest: "v. maximise opportunities for walking and cycling within the Sustainable Urban Extension, and connecting it with key uses outside the SUE such as employment areas, schools and shops; " A significant cycle route linking Pinchbeck with Spalding via Blue Gowt Lane and Two Plank Lane crosses the proposed SUE and the line of the Spalding Western Relief Road. (This cycle route has been omitted from Map 2, see later comment.) The need to protect it should be included as one of the requirements for development proposals. We suggest: "ix. incorporate the existing cycle route which links Pinchbeck with Spalding via Blue Gowt Lane and Two Plank Lane, including arrangements for the route to remain open for safe use throughout the construction of the development. " The design of the SWRR should include cycling facilities which are segregated from motor vehicles. We suggest: include segregated facilities for cycling in the design of the Spalding Western Relief Road. We commend Sustrans Design Manual "Handbook for cycle-friendly design" (April 2014) as the basis for the design of the SUE and SWRR.

Officer Comment:

Comments noted.

Officer Recommendation:

Review the policy in the light of the suggested improvements.

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

ID1: 654 comment\_author: Mr & Mrs E Woodcock

comment content:

Re Spalding Urban Extension. We would like to object to the proposed development in Pinchbeck. It is far too extensive for the amenities we have to be able to cope with, eg Dr, Dentist, Schools, Sewerage, roads etc. Getting into Spalding at certain times is a problem. You can start waiting at Wardentree Lane so building that amount of houses will put more pressure on the road, especially in that area. We need more houses but not on this scale. The land is good quality agricultural soil, we need food as well as houses. Spalding and Pinchbeck has had a lot of development in the last few years. You can only take so much. More and more heavy goods trains are now coming through Spalding which makes Woolram Wygate and Park Road crossings grid locked at times, another problem.

Officer Comment:

The need to ensure the provision of the additional community and physical infrastructure to meet the needs generated by the housing growth will be addressed in the South East Lincolnshire Infrastructure Delivery Plan (IDP) which is being prepared. In addition to helping to fund the delivery of the SWRR, it is intended that the Local Plan will help to provide support for other transport improvements across the town.

Officer Recommendation:

The exploration of how the Local Plan can support the delivery of improvements to existing transport infrastructure.

ID1: 655 comment\_author: Environment Agency

comment content:

Policy 13: We note that the plan identifies the need for a second urban extension in Spalding. We would highlight that further work to update the Strategic Flood Risk Assessment will provide more accurate information on flood risk to this area, which will need to be considered in respect of the viability for this proposal. However, as with any longer term (phased) development, it is likely that flood mitigation will need to be considered at the appropriate time through a site specific Flood Risk Assessment to accompany each phase of the proposal using the latest available information on flood risk and climate change.

Officer Comment:

Comments noted.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

ID1:

656

comment\_author: Rosina Chattell

comment content:

Ref proposed plan of housing between Spalding and Pinchbeck, only access into and out of settlement onto Spalding Road. This area is already congested due to traffic accessing the Johnston Community Hospital and Wardentree Lane Industrial Area, also at the junction with Wygate Road, especially at school times and people going to and from work. Educational needs, service requirements - particularly GP/dentist facilities, public transport requirements - all require extensive considerations and complete and full investigations are required prior to progressing these plans. These plans will have considerable impact on the rural aspects of these areas and this number of dwellings will destroy these rural aspects which the current residents value greatly.

Officer Comment:

The need to ensure the provision of the additional community and physical infrastructure to meet the needs generated by the housing growth will be addressed in the South East Lincolnshire Infrastructure Delivery Plan (IDP) which is being prepared. In addition to helping to fund the delivery of the SWRR, it is intended that the Local Plan will help to provide support for other transport improvements across the town. Unfortunately, delivering a significant increase in the number of dwellings in Spalding will inevitably involve the loss of some greenfield land.

Officer Recommendation:

The exploration of how the Local Plan can support the delivery of improvements to existing transport infrastructure.

ID1:

657

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

Policy 13 is limited to the promotion of a Sustainable Urban Extension to Spalding. It seeks to provide some certainty and guidance to support the delivery of the USE over the plan period. We object to the omission of HOB048 from this policy, as this site due to its scale, significance and links to other key development aspirations including the Peppermint Junction improvement scheme (identified under Policy 31) and the Distillery Farm Food Enterprise Zone (allocated as a Main Employment Area under Policy 7) should also be subject to appropriate guidance to support delivery of the scheme and to explore issues of phasing, etc. SUEs, because of their physical scale and the high opening up costs, experience problems with viability. We would anticipate that a policy promoting the development of this site would acknowledge the unique costs of the scheme and agree specific requirements for the site regarding issues such as open space, affordable housing.

Officer Comment:

To ensure that development takes place in a comprehensive, coordinated manner a policy will be prepared for delivery of the sustainable urban extension at Hob048.

Officer Recommendation:

Prepare new policy to enable the delivery of Hob048. Hob048 is one of the more suitable Potential Housing Sites in Holbeach and should be taken forward as Preferred Option Housing Allocation.

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

ID1:

658

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

Our clients support the inclusion of a strategic development to accommodate a significant level of growth in Spalding. Such a comprehensive approach seems the most appropriate method of planning for the necessary level of development. Policy 13 however fails to take into account the challenges and requirements for delivery of a large scale urban extension. Experience elsewhere in the region would suggest that SUEs due to the necessary high levels of investment necessary to open up a site, are unable, for instance, to deliver the same level of affordable housing or the range of Developer Contributions required from other allocations. The policy should be revised to specify the specific requirements that would be required to be delivered as part of each stage of the SUE in order to give investors and communities the confidence that the SUE will be delivered. Reference to other SUE designations, for instance at Central Lincolnshire, demonstrate the compromises necessary to facilitate the delivery of large scale sites, such as the Spalding SUE. Phase 1 would in effect reinforce the physical link of development between Pinchbeck and Spalding created by the Wardentree Lane area to the east and the existing ribbon of residential development to the west of the road. This seems to be a rational step: acknowledging the relationship between the settlements whilst also seeking to preserve their specific characteristics with the use of a new area of Green Infrastructure, which whilst being open will not be open farmland as is currently the case. Phase 1, however, is remote from the rest of the Sustainable Urban Extension and Spalding, separated as it is by the route of the SWRR, Vernatts Drain, the joint

Officer Comment:

Comments noted, but it should be appreciated that one of the major considerations in planning for an urban extension to the north of Spalding is the need to maximise the potential for funding the delivery of the SWRR through developer contributions. To this end, it is not considered that Site Pin057 can be of great assistance.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

railways line and the area of Green Infrastructure proposed as part of the allocation. It is right that the planning of development on Phase 1 should reflect this close relationship to Pinchbeck, include measures to maintain the character of the different areas and the distance from other elements of the Urban Extension. The current proposals for Phase 1 is not the most rational or effective use of land, and it would fail to offer a long term planned solution to the gap between Pinchbeck, Spalding and the Proposed SUE. The area already includes a number of residential and commercial properties and will come under increasing pressure for further development, and which would not be planned as part of the SUE. As such we would suggest that the extent of the phases of the Urban Extension should be revised to incorporate more development in Phase 1 to include other sites, including our clients land at PIN057. Taking this approach now would allow for the incorporation of an effective buffer between different areas of development and safeguard open land from future development pressure. The current Phase 2 the boundary of which appears to be defined only by land ownership and no other considerations, would be remote from Phase 1 and, due to the presence of Vernatts Drain and the proposed SWRR, would only have one direct link to Spalding proper, which would be the footpath across Two Plank Bridge. Other than along the SWRR, the only links to existing development would be along country lanes, such as Blue Gowt Drove. The SUE would be isolated from the settlement it is planned to extend. This will lead to a remote, isolated and unsustainable development. Phase 3 would have even less connection to the rest of Pinchbeck and Spalding, until the safeguarded land to the west of Spalding is delivered in a future plan period, as phase 3 would represent a

large lobe of development extension out to the open countryside north of Vernatts Drain. Whereas the future development of the Safeguarded site could resolve some of these concerns this will be at some considerable time in the future. A more effective approach, arguably, would be to promote the development of land to the west of the joint line, including our clients land, as part of Phase 1. This would acknowledge the level of development along Blue Gowt Lane, Mill Green and Spalding Lane and allow for the reinforcement of the services running out of Pinchbeck and Spalding. Even when taking into account the railway line these new neighbourhoods would be able to develop more effective links to existing settlements and allow the gradual improvement of roads, utilities and services, as well as support the delivery of the SWRR. Such a scheme could also include the planned provision of open space to help preserve the character of each settlement. It would, most importantly, not result in the creation of an isolated housing estate as would appear to be the case with the delivery of Phase 2 and Phase 3. Such an approach would also make more effective use of the investment in a new road bridge to cross the joint line, and maximise the benefits that may be derived from the necessary improvements to the smaller roads in the area. A sensitively designed development would be more in keeping with the requirements of Policy 28: Climate Change and Renewable and Low Carbon energy and Policy 29: Design of New Development as it would allow for the creation of effective neighbourhoods with access to existing areas of development.

ID1: 659 comment\_author: Paul and Hilary Williamson

comment content:

Whilst we feel it can reasonably be argued that Spalding needs a relief road, the present plans, whereby the road is to be funded by the housing developers, mean that the last thing Spalding is likely to get from the new road, as it is at present envisaged, is any relief from its existing traffic problems. Indeed, as far as the northern section of the new road is concerned, all it promises to do is make an already far too busy road into an even worse problem. What is needed, is to get some of the traffic out of Spalding, not to build up to 4000 new homes with, for the foreseeable future, only one exit for the (at a guess) at least 5000 cars they will bring with them. How can the proposed huge cul de sac ever be called part of a "relief road"? And who will ever fund the link between it and the A151 in from Bourne? If the road is to be built at all, then that link should be in place before a single house is built. What is needed is a link from the A151 as it approaches Spalding from Bourne, to the existing A1175 to the West of Spalding. A northern relief road serves no useful purpose that we can see. If the western/southern link were to be built, then any traffic wanting to go from Bourne to the Wardentree Lane/Enterprise Way businesses, could easily get there, and there would be no need at all for the northern part of the road. The only value for that, might be if there was a new bridge over the Vernatts Drain so that some of the traffic from the Woolram Wygate area could get to the Enterprise Way area, and onwards to Boston, without having to use the level crossings in Spalding. We have heard it said that Spalding needs the new bridge over the railway that the new road will bring, and indeed, a bridge or two (or an underpass) would

Officer Comment:

The 4,000 dwellings attributed to the urban extension will be delivered over a number of years stretching some time beyond the end of the Local Plan period in 2036, and such a figure is required to support the funding of the SWRR. It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed in order to minimise the impact on the Spalding Road. The need to ensure the provision of the additional community and physical infrastructure to meet the needs generated by the housing growth will be addressed in the South East Lincolnshire Infrastructure Delivery Plan (IDP) which is being prepared. In addition to helping to fund the delivery of the SWRR, it is intended that the Local Plan will help to provide support for other transport improvements across the town. Unfortunately, delivering a significant increase in the number of dwellings in Spalding will inevitably involve the loss of some greenfield land.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

help a lot to alleviate the traffic congestion caused by the level crossings, if suitable places could be found to put them, but as far as this local plan is concerned, the only people who would benefit from the new railway bridge would be the inhabitants of the new homes.

What surveys have been done along the road from Pinchbeck into Spalding? Anyone who uses that road regularly will know that at certain times of day it can easily be queuing from the traffic lights at the end of Woolram Wygate, back to the turning for Enterprise Way, and at times, even further than that. In the other direction, when traffic is travelling north up the Pinchbeck Road in Spalding, it is often queuing from as far back as the entrances to the car parks near Sainsburys up to the Woolram Wygate traffic lights. Cars need to park somewhere, and if my guess of around 5000 more cars using the local roads is correct, then what extra provision for parking in Pinchbeck and Spalding is being considered? What extra schools, doctors' surgeries, dentists, shops, etc will be part of the plans? The practical considerations don't take into account the huge change in the area that the proposed development north of the Vernatts Drain will bring. As another commenter has also said, the area is used a lot by joggers, cyclists and dog walkers. It is also an area rich in wildlife. Biodiversity is vital to the health and well being of our countryside, and the many creatures living in the area all contribute in one way or another both to our quality of life, and to the eco system on which we all depend. The whole concept of such a major development in the area between Spalding and Pinchbeck seems to us to be flawed, and should either be drastically cut back, or abandoned completely.

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

ID1: 660 comment\_author: Janine Twelftree

comment content:

1. I find the entire plan utterly disgusting “ it is completely despicable that secret discussions took place between council and landowners when assessing land for development, and only upon publishing this plan consultation d s any of that get made public, with the myriad agricultural fields already put on the maps as proposed for building on. I will reiterate the South Holland District Council s own rules “ no agricultural field may be built upon for housing unless there is an associated agricultural need demonstrated, and IF approved exceptionally, then agricultural occupation restrictions must apply. I therefore DEMAND that every agricultural field which appears on these maps as proposed for development of any non-agricultural kind are immediately and permanently removed from the proposals, and that the various officers and supervisors which undertook the work towards publishing this Local Plan are sent for retraining, if not immediately disciplined. A public apology for these mistakes is in order. This must not happen again; please take steps to ensure, totally ensure, the complete and permanent safety of all our communities: NO FIELDS MAY BE BUILT UPON. All fields are for growing and/or grazing only. It has always been this way; these are the rules which SHDC themselves set, and which we are all made to adhere to; those rules must continue to be adhered to .

2. When you rewrite this Local Plan, there are certain fields which must never be built on for any reason, even for agricultural need. I am sure there there must be similar instances in other parts of the district, but for my own parish where I live, there are some fields between Spalding and Pinchbeck which must remain. The current proposed plan has these fields mapped as

Officer Comment:

Comments noted.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

to be developed. This is not possible, as this would remove the current separation between Spalding town and Pinchbeck village. This has already been set in stone by our Pinchbeck Parish Council “ no building on the land inbetween the Vernatts Drain and Market Way. Please ensure this situation is remedied; the fields must remain as fields, and there must be no building of any kind which allows Spalding and Pinchbeck to merge. I will repeat because this is a critical point: the fields currently separating Pinchbeck and Spalding must remain as successful separators in perpetuity; not for any reason must there be a joining-up. This is critical to preserve Pinchbeck as a village. 3. There has been no justification published that any of this expansion is necessary at all. South Holland is a rural area, an area of low population density because buildings and homes are few and far between. If land is allowed to be built upon, not only do we lose the fields but the population density would increase due to extra people being able to live in all the extra housing. If the extra housing is not here, then the extra people would go somewhere else, and the area would remain rural; simples. We can t have a situation where everywhere rural is allowed to become towns; surely you can see that.

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

ID1: 661 comment\_author: Natural England

comment\_content:

We note that land to the south and west of the first phase (area A) of the urban extension has been allocated for green infrastructure which is welcome. We suggest that there could be green infrastructure corridors throughout the proposed site which could link with Vernatts Drain which is designated as a Local Wildlife Site.

Officer Comment:

Comments supported.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

ID1: 662 comment\_author: Derek Tansley

comment\_content:

Proposal to build 4000 homes on land adjacent to Vernatts Drain will overload existing infrastructure and will in effect make Pinchbeck part of Spalding. This is contrary to previous promises. Road R1-R3 Where does this Road figure in past plans? It appears to go nowhere and is a culdesac. Pin 045, 054, 057, 053, 056, 059 Again these developments seem to favour owners of these lands and will bring closer integration of Pinchbeck to Spalding. The Optional alternative to build the 4000 houses on the A151 Bourne Road corridor seems to make more sense. This land has not been promoted by any outside developer.

Officer Comment:

The emerging strategy of focussing housing growth to the north and west of Spalding has been influenced by the desire to fund the delivery of the SWRR as much as possible through developer contributions. It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed in order to minimise the impact on the Spalding Road. It should be noted that large-scale housing development will also be required to the west of Spalding to fund further stages of the SWRR.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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

ID1: 663 comment\_author: Cllr E Sneath

## comment content:

I have recently attended the local plan consultations at Pinchbeck and Surfleet and the numbers of residents attending shows how concerned and interested residents are about this consultation and their comments to me show deep disquiet mainly about the plans for Pinchbeck. My deep concerns lie in the suggested 4,000 houses North of the Vernatts in Pinchbeck. The proposed road to nowhere that will feed to these houses is nonsensical, the 5 arm roundabout suggested on Pinchbeck road will make an already seriously congested road a nightmare to travel on without any suggestion of a continuously connected South west relief road. Surely it must make more sense to start development to the West of Spalding where there is already a lot of new housing and some infrastructure, or to put this massive development across the other side of the Town completely and build in the southern side of the town, the Clay Lake area. This would be near to the new road to Peterborough and the new industrial development at the Lincs Gateway and also use the bypass to allow access in to the Wardentree Lane industrial estate. Both of the areas above are on the right side of town for the secondary Schools which would mean less travel for pupils trying to cross Spalding from Pinchbeck Road and negate the need for new secondary Schools to be built and it would enable commuters to travel to Peterborough more easily. No new road would needed there which would mean the development would not be so developer led and driven. There is not any support for the proposed development to take place North of the Vernatts or any sense in doing so with the relief road being merely a suggestion and far from

## Officer Comment:

It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed in order to minimise the impact on the Spalding Road. It should be noted that large-scale housing development will also be required to the west of Spalding to fund further stages of the SWRR.

## Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

deliverable and I am at a loss to understand how such an unpopular and unsustainable part of the plan can have reached this stage and have been included. It is obvious that Pinchbeck will need some development in the future and the preferred options of Pin 02, Pin 08, Pin 19, Pin 34 and Pin 53 would seem to be the most suitable and sustainable.

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ID1:

664

comment\_author:

Hume Planning Consultancy Ltd

comment content:

Broadgate support the allocation in Policy 13 for a sustainable urban extension at Spalding. Fundamental to this allocation is the provision of the Spalding Western Relief Road (SWRR). The provision of this should be made paramount in the policy which should make it clear at the outset that each of the phases A, B and C should ensure the provision of the relief road with no land ownership impediments in the form of potential for ransom payments that might hamper the overall completion in its entirety. The SWRR is fundamental to ensuring the sustainable provision of the proposed urban extension and has wider transportation benefits for the town as a whole. As a planned urban extension, the Master Plan for the area will need to have regard to needs of proper place making and the separate characteristics of Pinchbeck and its relationship to Spalding, ensuring that the identity of Pinchbeck is respected and placed in an appropriate landscape setting. Suggested changes: Add to the second paragraph Phases A, B and C should ensure the provision of the relief road through each phase in its entirety, with no land ownership impediments that would prevent the completion of the relief road through each phase of development; it is expected that future phases of development will fund further sections of the SWRR. Broadgate are committed to funding the road through Phases of development that it develops.

Officer Comment:

Support noted.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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

ID1:

665

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

Our client supports the inclusion of a strategic development to accommodate a significant level of growth in Spalding. Such a comprehensive approach seems the most appropriate method of planning for the necessary level of development. Policy 13 however fails to take into account the challenges and requirements for delivery of a large scale urban extension. Experience elsewhere in the region would suggest that SUEs, due to the necessary high levels of investment necessary to open up a site, are unable, for instance, to deliver the same level of affordable housing or the range of Developer Contributions required from other allocations. The policy should be revised to specify the specific requirements that would be required to be delivered as part of each stage of the SUE in order to give investors and communities the confidence that the SUE will be delivered. Reference to other SUE designations, for instance at Central Lincolnshire, demonstrate the compromises necessary to facilitate the delivery of large scale sites, such as the Spalding SUE. Phase 1 would, in effect, reinforce the physical link of development between Pinchbeck and Spalding created by the Wardentree Lane area to the east and the existing ribbon of residential development to the west of the road. This seems to be a rational step: acknowledging the relationship between the settlements while also seeking to preserve their specific characteristics with the use of a new area of Green Infrastructure, which while being open will not be open farmland as is currently the case. Phase 1, however, is remote from the rest of the Sustainable Urban Extension and Spalding, separated as it is by the route of the SWRR, Vernatts Drain, the joint railways line and

Officer Comment:

Comments noted, but it should be appreciated that one of the major considerations in planning for an urban extension to the north of Spalding is the need to maximise the potential for funding the delivery of the SWRR through developer contributions. To this end, it is not considered that Site Pin053 can be of great assistance.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

the area of Green Infrastructure proposed as part of the allocation. It is right that the planning of development on Phase 1 should reflect this close relationship to Pinchbeck and include measures to maintain the character of the different areas, the distance from other elements of the Urban Extension. The current proposals for Phase 1 are not the most rational or effective use of land, and they would fail to offer a long-term planned solution to the gap between Pinchbeck, Spalding and the Proposed SUE. The area already includes a number of residential and commercial properties and will come under increasing pressure for further development, which would not be planned as part of the SUE. As such we would suggest that the extent of the phases of the Urban Extension should be revised to incorporate more development in Phase 1 to include other sites, including our client's land at PIN053, which is also adjacent to Pinchbeck and, as such, could provide an early phase of development, served as it is by existing services and roads. Taking this approach now would allow for the incorporation of an effective buffer between different areas of development and safeguard open land from future development pressure, while incorporating the existing development, such as PIN053 which lies between Pinchbeck and Spalding. The SWRR will be essential to support the overall SUE, it will also be important to maximise the role of the wider road network to ensure that the resulting development is not dependent on a single point of entry, and to maximise the opportunity to access services and utilities in the wider area. The current Phase 2 at the boundary of which appears to be defined only by land ownership and no other considerations, would be remote from Phase 1 and, due to the presence of Vernatts Drain and the proposed SWRR, would only have one direct link to

Spalding proper, which would be the footpath across Two Plank Bridge. Other than along the SWRR, the only links to existing development would be along country lanes, such as Blue Gowt Drove. The SUE would be isolated from the settlement it is planned to extend. This will lead to a remote, isolated and unsustainable development. Phase 3 would have even less connection to the rest of Pinchbeck and Spalding, until the safeguarded land to the west of Spalding is delivered in a future plan period, as Phase 3 would represent a large lobe of development extension out to the open countryside north of Vernatts Drain. Whereas the future development of the safeguarded site could resolve some of these concerns, this will be at some considerable time in the future. A more effective approach, arguably, would be to promote the development of land to the west of the joint line, including our client's land, as part of Phase 1. This would acknowledge the level of development along Blue Gowt Lane, Mill Green and Spalding Lane and allow for the reinforcement of the services running out of Pinchbeck and Spalding. Even when taking into account the railway line, these new neighbourhoods would be able to develop more effective links to existing settlements and allow the gradual improvement of roads, utilities and services, as well as support the delivery of the SWRR. Such a scheme could also include the planned provision of open space to help preserve the character of each settlement. Most importantly, it would not result in the creation of an isolated housing estate, as would appear to be the case with the delivery of Phase 2 and Phase 3. Such an approach would also make more effective use of the investment in a new road bridge to cross the joint line, and maximise the benefits that may be derived from the necessary improvements to the smaller roads in the

area. A sensitively designed development would be more in keeping with the requirements of Policy 28: Climate Change and Renewable and Low Carbon Energy and Policy 29: Design of New Development, as it would allow for the creation of effective neighbourhoods with access to existing areas of development.

ID1: 666 comment\_author: Nicholas Revill

comment content:

Land earmarked as Potential Housing Site in the South and South East of the Town is far more appropriate to build on than those designated as Preferred Housing Sites. The areas are straight onto trunk roads, and would serve to alleviate the current congestion and pressures on roads between Pinchbeck and Spalding that will be caused by any building in that area. They are also more convenient for local amenities. As I drive into Spalding from Peterborough or Stamford directions it seems a completely obvious choice. One that is easily accessed and above all achievable. One that can be brought to the Table quickly and without drama or Hope needed to attain the goals, and one that brings much needed quality housing to the area. We need to turn Spalding into a thriving Town and a sustainable Centre for commerce. I would therefore urge the council to reconsider their plans and make a choice that will see the Town progress and thrive. One with the vision to deliver what is needed now and quickly. The plan parts marked Potential Housing Sites are deliverable immediately, without congestion, without new roads involved. They are surrounded by the infrastructure required. The flood risk would also be similar to the area that is being termed Preferred.

Officer Comment:

The emerging strategy of focussing housing growth to the north and west of Spalding has been influenced by the desire to fund the delivery of the SWRR as much as possible through developer contributions. In addition, these areas tend to be more acceptable in terms of seeking to avoid areas of significant flood risk. Accordingly, it is not considered appropriate to identify significant areas for residential development to the south of the town.

Officer Recommendation:

No change is made to the proposal for accommodating major housing growth to the north of Spalding.

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

ID1:

667

comment\_author: RSPB

comment\_content:

As per our comments on Policy 5 the RSPB recommend the Local Plan specifies the amount of open space appropriate for new developments. Provision of sufficient open space will help mitigate the impacts of a new development on nearby protected sites.

Officer Comment:

Comments noted.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

ID1:

668

comment\_author: Historic England

comment\_content:

Concern is raised regarding the extent of development and the impact upon both Spalding and Pinchbeck.

Officer Comment:

Comment noted, but a significant amount of land is required to meet the need for additional housing in Spalding.

Officer Recommendation:

This point is taken into account in developing the proposals for the urban extension to the north of Spalding.

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

ID1: 669 comment\_author: Longstaffs

comment content:

3. In respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units. If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

These comments are not accepted as the target provision of affordable housing should reflect the need for it, as identified in the respective up-to-date Strategic Housing Market Assessments.

Officer Recommendation:

No change is made to the emerging Policy 15.

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ID1: 670 comment\_author: Mr Peter Sanders

comment content:

I am strongly opposed to your proposal to put 4000 houses in Pinchbeck to finance the first portion of what is intended to be a western relief Road for Spalding without any idea and timescale for it to be connected to any road other than the B1356 Spalding Road. At the Pinchbeck Consultation I was told by one of the officials that a large roundabout is required here to deal with the level of traffic from these houses plus the existing vehicles commuting to Spalding together with vehicles from Spalding going to The Wardentree Industrial Estate and the A16. As the traffic already backs up to the junction of Enterprise Way it is very clear that the road system beyond will not be able to cope with the extra vehicles which will exceed an extra 4000 vehicles while there is not a south western outlet from the development as well. Previous plans showed these 4000 homes out near Pode Hole and paying for the western Bypass from Enterprise Way to Bourne Road. Without that outlet this number of homes will cause serious congestion. This plan may please the developer but will cause problems to the residents of Pinchbeck and to those on this side of Spalding. Any Western bypass running from the end of Enterprise Way should be the Northern Boundary of Spalding. Any housing north of this will turn Pinchbeck into a suburb of the Town without a clear gap between the two. The SWRR would indeed improve traffic considerably but this plan does not go even halfway to completing it and will in the meantime make the road situation much worse. To meet my concerns the SWRR needs to be the Northern boundary of Spalding with a clear gap to Pinchbeck, and no development in this area should be allowed until realistic plans for the SWRR to at least Bourne Road are

Officer Comment:

The 4,000 dwellings attributed to the urban extension will be delivered over a number of years stretching some time beyond the end of the Local Plan period in 2036, and such a figure is required to support the funding of the SWRR. It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed in order to minimise the impact on the Spalding Road. In addition to helping to fund the delivery of the SWRR, it is intended that the Local Plan will help to provide support for other transport improvements across the town. Unfortunately, delivering a significant increase in the number of dwellings in Spalding will inevitably involve the loss of some greenfield land.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

in place. Pinchbeck is a thriving Village and wants to remain clearly separated from Spalding.

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ID1:

671

comment\_author: James Johnson

comment content:

Firstly the whole scheme put forward appears to rely totally on the delivery of the Western relief road. I get the impression that the draft local plan is the best the planning team could put together with what has been put to them rather than what is ideal for Spalding. Even the planners I spoke to didn't seem convinced that the relief road could be delivered, and were hoping rather than predicting. The fact the road has to wiggle around a small parcel of land at the Spalding common connection as a small parcel of land has not been taken on by the developer seems it has not been totally thought through. The fact they need the developer to help fund the relief road, so in that case they permit the developer to build more houses around the road, just to get the road built to serve the houses that are built, but eventually when or if its completed will act as a relief road in 30 or more years was not convincing. Hearing the figures of the road cost, £ 6million for one bridge, 2 required,.... Rough cost £100 million for road would take up any developers profit. The Western relief road will not be a relief to Spalding until it is completed from Spalding common to Pinchbeck road. Surely the road should be completed as a priority before any development takes place in the area around the relief road, otherwise all it will do will just deliver more traffic onto the already congested Pinchbeck road from the dwellings planned, until the road is completed, which according to the document may or may not be 30 years. The construction of the Spalding common section of the western relief road first would make more sense although it is further from the town centre. It has been suggested that Construction of the road around the A151 should commence before joining

Officer Comment:

The emerging strategy of focussing housing growth to the north and west of Spalding has been influenced by the desire to fund the delivery of the SWRR as much as possible through developer contributions. In addition, these areas tend to be more acceptable in terms of seeking to avoid areas of significant flood risk compared with the Clay Lake area. Accordingly, it is not considered appropriate to identify significant areas for residential development to the south of the town. It is not intended that a large 'cul-de-sac' housing development should be created, and an extension of the proposed SWRR round to the A151 Bourne Road will be required after a certain number of dwellings have been completed in order to minimise the impact on the Spalding Road.

Officer Recommendation:

No change is made to the proposal for accommodating major housing growth to the north of Spalding.

Pinchbeck road however this would only add more congestion to Hawthorn Bank and Winsover road, which along with the predicted increase in rail traffic would only add to the chaotic traffic situation experienced. A solution would be to permit development in the south eastern region of Spalding between the existing bypass A16 and Cowbit road, Clay lake, until the Western relief road is completed. Development in this area makes more sense as not only is there direct access to the bypass to Peterborough and Boston, Cowbit road, Clay lake, it is in close proximity to primary, secondary schools, doctors, amenities and the town centre. Looking at the map of Spalding this is an obvious area for development that has been overlooked in favour of the north western side. It has been put forward by landowners, and is the region stm 5, 9, 15, 16, 17, 18, 19 and 21. Forming a large area that has many advantages over what is preferred. Land in the south eastern area is already connected to the A16. Admittedly it d s not deliver the western relief road, but it d s deliver no effect on congestion to the town centre and d s not rely on expensive infra structure, even question the need for a western relief road if more development is located in this region. The Western relief road appears to serve the development rather than ease congestion. Surely the traffic on Pinchbeck road is mainly people heading to the town to work, shop or get to schools. If you were heading to Peterborough you would try and get on the A16 as soon as possible via Wardentree lane rather than head through town. Exactly how many people need to get from Pinchbeck road to Spalding common or Bourne road? The route to Boston and Peterborough is used more. Question the location and provision of schools, doctors, dentists in the plans. Secondary schools are not close to the preferred development

sites. To get to the schools require more additional car journeys, and crossing rail lines adding to congestion. The land in the Clay Lake area is in close proximity to the primary and secondary schools, with cycle tracks and pavements and a short distance to the town centre. With added bus routes the area would be well connected, without the need for expensive infrastructure. Including land in the South eastern area may allow individual and smaller developers the chance of building to a different plan and style rather than being controlled by one or two builders. That may prevent a sea of non de script houses on estates that one could drive around for hours looking for a way out that are currently being constructed in some of the housing developments in the area. The north western side of the town is already becoming one large housing estate. And by the preferred options it would just get bigger. There is a fantastic opportunity to develop the South Eastern side of the town with open spaces, walks along the river, both the Coronation Channel, the Welland, and Cowbit wash. Parks and water side attractions that would attract people to the area. One of their main arguments for not developing the south eastern side was that to do so would not deliver any benefit to the town (I assume the relief road). One could argue it delivers no added detrimental effect on the town, but has many advantages. There are already encouraging sites being put forward in the southern region with great potential employment opportunities, the Spalding Gateway site and businesses relocating to the Clay Lake industrial area. There is potential for this to expand, again in close proximity to the A16. Land in this area will also encourage development away from the Spalding/Pinchbeck corridor preserving Pinchbeck's village character. Being in a flood risk area has been raised, however all the land around Spalding is virtually

the same level. The level at Spalding common is the virtually the same as Clay Lake. The land at Clay Lake is partially protected as the land in Cowbit wash would act as a flood plain with a considerable area that would flood before Clay Lake. Along with dwelling floors raised, this would negate the issue. The quality of land in the Clay Lake area is as its name dictates of a lesser grade 2 than that of the grade 1 silt in the preferred development region. In times of a growing population productive farmland should be preserved. In conclusion I would like the planners to reconsider their preferred options, the feasibility and effect the Western relief road will have on the town, and to consider opening up the south eastern side of the town between Cowbit road and the A16 that has many wonderful opportunities if planned correctly.

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ID1: 672 comment\_author: Lincolnshire Wildlife Trust

comment content:

We support the provision of a large area of open green space, protected from development to maintain the separation between Pinchbeck and Spalding. As this land and the route of the Spalding Western Relief Road appear to be adjacent to Vernatt's Drain Local Wildlife Site (LWS), we would expect these developments to seek to enhance the biodiversity of the area by ensuring that provision of new habitats complements the habitats present in the LWS and works to buffer and extend the existing network of green infrastructure. We would recommend that wildlife is designed in to developments from an early stage. Wildlife enhancements should contribute to targets in the Lincolnshire Biodiversity Action Plan and developers should seek to produce a net gain in biodiversity. It is important that natural greenspace is available for both people and wildlife. Sufficient natural greenspace should be accessible to residents to meet Natural England's Accessible Natural Greenspace Standards. The development of a new Spalding Western Relief Road may also bring about opportunities to incorporate species rich grassland habitats along wide road verges bordering the route. Broad strips of grassland could act as both a buffer to the existing LWS against potential impacts of a new road development and also as an extension to these habitats in the long term.

Officer Comment:

Comments supported.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

ID1:

673

comment\_author: Spalding and District Civic Society

comment content:

The whole housing question is bedevilled conflicting government policies. The number of houses envisaged seems to increase with each draft of the plan in part driven by requiring developers to fund major infrastructure, thus increasing the number of houses (see the circular argument Q/5. 3. I) and pushing up their prices. Major highways infrastructure should be funded by central government.

At the same time as vastly increasing the size of the town, government policies deprive Spalding of the facilities required to support such an increase e.g. the closure of the Magistrates Court (increasing non-sustainable car journeys) and threatened closure of the 16+ college and a special school.

The major area allocated for the housing needed to fund the Western Relief Road is west of the railway line, yet all the community facilities (from hospital to secondary schools, shopping centre to leisure provision) are east of it, exacerbating level-crossing tail-back problems in the town. The road itself will do little to improve this.

We object strongly to housing developments N. of the Vernatt"s, joining up as it does Spalding and Pinchbeck. The so-called separation zone allocated is a mere fig leaf, scraps of land round a major roundabout, of no visual or recreational value at all. The only major new housing area we can support is Mon005.

There is no mention of the housing problems created by the 14,000 seasonal workers and how they might be resolved.

5.3.2 No amount of 'high quality residential environment' can appropriately compensate for the loss of open land.

Officer Comment:

The preparation of the Local Plan cannot take responsibility for various Government policies beyond its control. The emerging strategy of focussing housing growth to the north and west of Spalding has been influenced by the desire to fund the delivery of the SWRR as much as possible through developer contributions. In addition, these areas tend to be more acceptable in terms of seeking to avoid areas of significant flood risk.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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

Policy 13, iii Begin: 'create distinctive places and'  
5.3.5 Second sentence: add 'shops'.

ID1:	674	comment_author: Greater Lincolnshire Nature Partn	
comment_content:	Officer Comment:	Officer Recommendation:	
Comment The GLNP notes that this Policy contains a commitment to an area of Green Infrastructure west and south of Area A . No mention is made of this area in the rest of the supporting text. While we support the Joint Committee for ensuring the protection of this area it is important that the long term management costs of this area are appreciated and integrated into the plans for the Sustainable Urban Extension. This will ensure the area can be an asset to the development, that the benefits are realised and continue into the long term rather than failing due to poor management.	Comments supported.	These points are taken into account in developing the proposals for the urban extension to the north of Spalding.	

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

ID1: 675 comment\_author: Lincolnshire County Council

comment content:

Strategic Planning Comments It is noted that, unlike other settlements, Preferred Housing Sites are put forward, because of their close association with the "North Phase" of the Spalding Western Relief Road (SWRR) and these constitute the Sustainable Urban Extension (SUE). LCC support the rationale for the location and phasing of this SUE to deliver both the SWRR and the housing needs of Spalding. It is noted, however, that it is very unusual for a major SUE to be outside the line of the road serving it. It will be difficult to establish a defensible boundary for Spalding in this flat agricultural landscape, especially with other site options outside the SUE, and this needs careful consideration. It is noted that only Spalding has a SUE policy. While it is understood that this is because at this stage there is not a single SUE allocation in Boston or in other settlements, it would perhaps be sensible to have a Boston and a generic SUE policy going forward. If this necessarily means that broad areas of policy are covered, for example, by including policy criteria that require the SUE promoter to fully consider transport solutions and, if it is not clear at that stage what such solutions would include, then that draft of the policy would not need to specifically name solutions. Public health Comments Local Public Health officers would welcome being part of the discussion with potential developers and land owners at pre application advice and broad concept plan stages. There is a particular role for Health Impact Assessment (HIA) (see comments on Policy 30) given the scale of the development site with Public Health helping ensure recommendations are followed through to full permission.

Officer Comment:

Support in principle noted.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

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

ID1: 676 comment\_author: Mrs C Ward

## comment content:

I am writing to express my concerns and views regarding the proposed local plan in South Holland. After reading your proposal it is my understanding that a local bus route and substantial road network which makes up the Western Relief Road will be required in Spalding. I can understand that you wish for transport routes to be developed in the area but I am very concerned that the once quite street Broadway will be heavily impacted with cars , lorries and buses. This is of great concern to me as I have not only small children but also animals which make up my family unit. Animals, children and traffic do not mix well. You have not made it clear on the following points:- 1) Where the road access points will be for the routes in and out of the future phase development eg future land north and future land west, so I can only assume that Broadway will yet again be the main route in and out to the north and the access point to the Raceground will be the main route to the south. 2)Where the potential bus route will actually fall. How frequent the buses will be throughout the day and where the bus stops will be. 3)Where the shops, school and community center will be as this will impact on traffic levels immensely. My house is adjacent to the public footpath on Broadway, so not only will pollution become an issue but the privacy of our house will most certainly be compromised. We are already seeing a vast amount of lorries, vans HGV and building suppliers up and down the street and this is obviously only going to get worse in number as more and more houses are built and more and more cars , buses, vans, lorries etc come to the area.

## Officer Comment:

Comments noted.

## Officer Recommendation:

These points will be taken into account in developing the proposals for further major residential growth to the west of Spalding.

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

Whilst I understand the need to develop Spalding and put its face on the map in the modern world there has been no mention of positives regarding the existing neighborhood and what we will gain only what we can see happening to be a detrimental effect to our peace and quiet, our privacy and the safety of our children and elderly especially, as local residents.

We already have cars coming up and down this street incredibly fast and have had to have 2 new radar speed signs to counteract speeding and this is nothing compared to how busy Broadway will become once all the proposed housing has been built. This is a huge negative in my book as we moved to Spalding in October because of the peace and quiet, not to be in the hustle and bustle of a noisy town / city.

To conclude, I am concerned about noise levels, loss of privacy, transport increase, air quality and the environmental impact on the local area which includes the local wildlife and have not seen anything in your plans which puts my mind at rest regarding these areas.

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ID1:	677	comment_author:	Anglian Water Services Ltd
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comment_content:	Officer Comment:	Officer Recommendation:
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Policy 13 includes reference to the incorporation of a comprehensive Sustainable Drainage System which is welcomed. It is considered it would be helpful to consider the available capacity within the foul sewerage network and the potential need for on and off-site improvements to bring forward this site. Therefore it is suggested that Policy 13 includes the following additional text: vix. provide a foul drainage strategy for the whole site and each phase of the development

Comments noted.

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

ID1:

678

comment\_author: Heather Violet

comment content:

1. The protection of the open space between Pinchbeck and the north of Spalding and safeguarding Pinchbeck's integrity as a village is paramount. Development on land availability codes Pin 40/20/16/01/45/31/59/57/53 and the eastern reaches of O61 would compromise the separation of the village from Spalding. 2. A first phase cul de sac of the SWRR as proposed north of the Vernatts is flawed on many counts. Residents of this area already enjoy sleepless nights due to regular freight traffic (due to be increased); residual noise from the Enterprise Way industries. The proposed route of the SWRR will effectively box in residential development in the North by noise and, eventually, diesel pollution, not to mention the impact on the wide range of wildlife the Vernatts environs enjoys. In addition much of the land earmarked becomes water logged during wetter winters, and there is the small matter of the major gaspipe which runs through it and over the Vernatts. 3. The proposed housing development to be served by the SWRR cul-de-sac can only bring traffic chaos beyond and above the existing to Pinchbeck Road since all new residents would have to travel south to access schools, shops, essential services (doctors, dentists, vets etc). With the Woolram Wygate/Park Rd level crossings closed, this stretch of road already becomes chaotic.

Officer Comment:

It is accepted that there will be certain impacts on the local environment in allowing development on greenfield sites, not just in Spalding but nationally. However, a significant amount of land is required to meet the need for additional housing in Spalding, and the emerging strategy of focussing housing growth to the north and west of Spalding has been influenced by the desire to fund the delivery of the SWRR as much as possible through developer contributions. In addition, these areas tend to be more acceptable in terms of seeking to avoid areas of significant flood risk.

Officer Recommendation:

No change is made to the proposal for accommodating major housing growth to the north of Spalding.

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

ID1:

679

comment\_author: Waller Planning

comment content:

We support the identification of Site Pin045 as a Preferred Housing Site in the draft Local Plan. This site is controlled by Ashley King Developments, who are committed to working with South Holland District Council and Lincolnshire County Council in ensuring the delivery of residential and retail development on this land, to enable the construction of the first part of the Spalding Western Relief Road (SWRR). In addition, Ashley King Developments control Site Pin16, which is adjacent to Pin45, and also the land to the west of the railway line. We propose that these sites should also be identified as Preferred Housing Sites, alongside Pin045. Ashley King Developments and their consultants have already undertaken extensive work in investigating the potential design and delivery of this development, and they are confident that it can be delivered in a timely manner. Technical reports have been prepared with regard to a number of issues, including archaeology, ecology, flood risk and drainage, and extensive dialogue has been undertaken with the relevant utilities providers and statutory consultees. There are no known constraints which would prevent development from taking place, or cause unacceptable delays. We have some specific comments in relation to the delivery of the site and the current wording of Policy 13, which are set out below. Funding and Delivery Ashley King Developments accept that it is the Councils intention that the new SWRR should be funded by new development along its length, as set out in the Local Transport Plan. They also accept that the northern part of the SWRR will begin with the development of Sites Pin16 and Pin45, and the land to the west of the railway, which would together fund the construction of

Officer Comment:

The supporting comments are noted, but it not accepted that a significant retail facility - instead of housing - would be appropriate in this location given its potential impact on the town centre.

Officer Recommendation:

These points are taken into account in developing the proposals for the urban extension to the north of Spalding.

the first northern section of the road. However, it will be necessary for the Councils to take a flexible approach to the form of development on these sites, in order to ensure that they are able to provide sufficient funding to deliver the road. We note that this is recognised in the Technical Paper<sup>1</sup>, where the possible need for alternative funding sources is discussed. No such alternative sources of funding have so far been identified. We believe that the development on Ashley King Developments land will be able to fund the required section of the new road, provided that the Councils are willing to take a flexible approach to other policy considerations, such as the provision of affordable housing, and through the inclusion of ancillary development uses. These are issues of detail which will need to be discussed in due course, but we suggest that Policy 13 should recognise the need for this type of flexibility, to ensure the road's timely delivery. It may also be necessary to explore alternative options for development which can raise sufficient funding to pay for the road. We have noted in our separate representations concerning Policy 22 that there is a need for new comparison and convenience retail development, which has been identified by the Councils Retail Study. This need is not currently met by any proposed allocations with the draft Local Plan. We believe that this land, at the northern end of the SWRR, is a suitable location for both types of retail development. It would be well connected by road and transport links, and so would be generally accessible to residents of the town and other areas. This retail development would also be able to contribute directly towards the provision of the SWRR. It is necessary to maximise the amount of housing which can provide funding towards the new road, as the cost of providing it is likely to be high. As drafted, Policy 13 indicates that

the land to the west of the railway line would not be developed, but that it would be designated as Green Infrastructure . This land is also controlled by Ashley King Developments, and it is available for development which can help to fund the new road. We suggest that development on this land, which will be alongside the new road and the railway line, could be offset by an area of open space which would separate the new development from Pinchbeck. We have also noted the proposals in Policy 13 and the Technical Document. Ashley King Developments believe that there may be more cost-effective ways of designing the road, which could still achieve its primary objectives, and they are keen to continue to discuss this with the Councils, to reach a mutually suitable solution, to allow the road to be delivered as soon as possible. Proposals Map We note that the Proposals Map identifies a Protected Road Line , which runs in a straight line from Spalding Road and along Vernatt s Drain. We suggest that this line should be labelled as being illustrative at this stage, as the detailed design process has not yet been concluded, and Ashley King Developments wish to continue to work collaboratively with the Councils to achieve a positive outcome in this regard. We therefore suggest that the Proposals Map Key should read Illustrative Route of Protected Road . Our proposed changes to the Proposals Map are shown on the accompanying Drawing 224/401. Policy Wording As the detailed design of the road is still being undertaken we suggest that the wording of Policy 13 should be made more flexible. It would not be appropriate for a strategic policy to pre-empt matters of detail which may yet be subject to change, depending on design and viability considerations. We therefore suggest the following changes to the policy wording (deleted text is struck through and new text is in bold): Land to the

north of the Vernatt s Drain, as identified on the Policies Map (Pinchbeck and Spalding Inset), will provide approximately 4,000 dwellings, retail development and supporting community infrastructure, the North Phase of the Spalding Western Relief Road (SWRR) and open space separating the village of Pinchbeck from the town of Spalding. The urban extension will be delivered in several phases, the completion of which is expected to extend beyond the Local Plan period. The following phased approach to delivery will be required, as identified on the Pinchbeck and Spalding Inset: A. The first phase will include: 1. the creation of a five-spur roundabout at the junction of Spalding Road with Enterprise Way (Roundabout 1, which will form the first part of the North Phase of the SWRR); and 2. residential development of some 15 26 ha of land lying to the east and west of the Joint Line railway and north and south of the proposed North Phase of the SWRR (designated as Area A) and accessed off the above-mentioned five-spur roundabout. Land to the west and south of Area A is designated as Green Infrastructure and will be protected from built development. Within this area, appropriate green separation will be provided between the new development and Pinchbeck. Concluding Thoughts We believe that it is necessary for the Policy to be flexible at this stage, to ensure that it can be delivered. Ashley King Developments look forward to working with the Councils in the delivery of this development and the new SWRR.

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

ID1:

680

comment\_author: Andrew Burling

comment content:

Policy 14 Whilst we support the proposed mix of Affordable Housing in this policy which is driven by the councils housing needs study however we cannot support the mix for the Open Market dwellings. As private developers it is in our interests to ensure through our market research that each prospective site has the correct housing mix, driven by specific demand and localised architectural typology and style for the area. Providing an specific mix as stated in this policy will limit the quality of architectural design, individual choice and creation of distinctive places. There will also be an affect on viability if the mix of housing is restricted and developers will be unable to provide a different approach to other sites in the area creating a lack of choice. We strongly suggest that the approach to this guidance is dropped in the Local Plan and that in the case of Open Market dwellings the mix of properties is left to market demand, save for that developments should be required to provide a mix of accommodation (but without specific percentages for each type).

Officer Comment:

Policy 14 does not provide a specific mix as it states "about" and also has a clause inviting would be developers to justify substantial variations within the terms that the objector puts forward.

Officer Recommendation:

No change to the approach is recommended

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

ID1: 681 comment\_author: Mrs E Whettingsteel

comment content:

The Councils proposal to seek to secure a mix of property types including both market and affordable housing on developments of 10 dwellings or more is fully supported, as this widens the opportunities for home ownership and creates sustainable, inclusive mixed communities in accordance with paragraph 50 of the NPPF.

Officer Comment:

Support

Officer Recommendation:

No change to the Policy is recommended

ID1:

682

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

we support the efforts to identify the Mix of Housing to meet the needs of the wider area. This will help developers decide which form of development would be successful in each area. It is not appropriate, however, for each site to echo the split of house types required to meet the entire district s need. The nature of each site, regarding size, constraints, topography will influence the type of development that can be delivered. Another factor will be the Mix of Housing already present in a specific location, which may have an imbalance that needs to be addressed and the role that settlement plays in the wider area. Policy 14 should be amended to ensure that these various factors are taken into account and it should not promote a set mix of house types on every development regardless of the demands of the area. The policy should also be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

ID1:

683

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

we support the efforts to identify the Mix of Housing to meet the needs of the wider area. This will help developers decide which form of development would be successful in each area. It is not appropriate, however, for each site to echo the split of house types required to meet the entire district s need. The nature of each site, regarding size, constraints, topography will influence the type of development that can be delivered. Another factor will be the mix of housing already present in a specific location, which may have an imbalance that needs to be addressed, and the role that settlement plays in the wider area. Policy 14 should be amended to ensure that these various factors are taken into account. It should not promote a set mix of house types on every development regardless of the demands of the area. The policy should also be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

ID1:

684

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

we support the efforts to identify the mix of housing to meet the needs of the wider area. This will help developers decide which form of development would be successful in each area. The mix currently included in the policy, however, is based on the findings of a Strategic Housing Market Assessment. Such assessments tend to be designed for the housing needs of general areas and are not designed to pick up on unusual housing markets where there is a concentration of students, services personnel or indeed a need for temporary accommodation for seasonal workers in agriculture, despite the fact that these specific areas can have a significant effect on the wider housing market. Policy 14 should be amended to acknowledge the impact that a need for temporary accommodation can have on the wider housing market and to support the delivery of such accommodation where and when it is needed. Clearly temporary accommodation for workers will be provided in specific locations, close to the source of employment and will not be incorporated into the mix of housing provided across the South East Lincolnshire Area.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

It is unsure what "temporary accommodation" may mean or what type of development is being proposed. It would seem to be a different consideration to residential development and is therefore not a consideration of Policy 14

Officer Recommendation:

No change to the Local Plan is recommended.

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

ID1:

685

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

we support the efforts to identify the mix of housing to meet the needs of the wider area. This will help developers decide which form of development would be successful in each area. It is not appropriate, however, for each site to echo the split of house types required to meet the entire district. The nature of each site regarding size, constraints, topography will influence the type of development that can be delivered. Another factor will be the mix of housing already present in a specific location, which may have an imbalance that needs to be addressed and the role that settlement plays in the wider area. Policy 14 should be amended to ensure that these various factors are taken into account, and it should not promote a set mix of house types on every development regardless of the demands of the area. The policy should also be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

ID1:

686

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

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Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

ID1:

687

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

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Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

ID1:

688

comment\_author:

Hume Planning Consultancy Ltd

comment content:

Policy 14 (Housing Mix) is too prescriptive and will be out of date before the Plan is adopted. Paragraph 50 of the Framework requires housing provision to meet the needs of different groups of people and requires this to be done with a degree of flexibility. Policy 14 is inimical to this. Broadgate have identified a need for larger executive homes to increase the attractiveness of the area to senior management and skilled staff that local industries struggle to attract. Paragraph 5.4.4 suggests that Policy 14 will not only bring about better design, but will remain sustainable, viable and attractive residential environments in the long term. This rationale, resulting from the application of Policy 14, that deals solely with housing mix, has no foundation. Locational and design policies in the Plan will achieve these objectives. Broadgate are prepared to discuss housing mix when proposing new development, but not on the rigid basis set out in Policy 14. The Policy should be deleted.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale.

The Policy allows site specific variations to be justified.

It is acknowledged that Policy 14 is not in itself the sole means to encouraging good design.

Deletion of the Policy would ignore that different members of the community have different housing needs to be met and that it is appropriate for the plan to provide for them.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended and the Policy should be retained.

ID1:

689

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

we support the efforts to identify the Mix of Housing to meet the needs of the wider area. This will help developers decide which form of development would be successful in each area. It is not appropriate, however, for each site to echo the split of house types required to meet the entire district s need. The nature of each site, regarding size, constraints, topography will influence the type of development that can be delivered. Another factor will be the Mix of Housing already present in a specific location, which may have an imbalance that needs to be addressed, and the role that settlement plays in the wider area. Policy 14 should be amended to ensure that these various factors are taken into account, and it should not promote a set mix of house types on every development regardless of the demands of the area. The policy should also be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

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

ID1:

690

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

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Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

ID1:

691

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We support the efforts to identify the Mix of Housing to meet the needs of the wider area. This will help developers decide which form of development would be successful in each area. It is not appropriate, however, for each site to echo the split of house types required to meet the entire district s need. The nature of each site, regarding size, constraints, topography will influence the type of development that can be delivered. Another factor will be the Mix of Housing already present in a specific location, which may have an imbalance that needs to be addressed, and the role that settlement plays in the wider area. Policy 14 should be amended to ensure that these various factors are taken into account. It should not promote a set mix of house types on every development regardless of the demands of the area. The policy should also be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

ID1:

692

comment\_author:

Clowes Developments North Wes

comment content:

Clowes Developments (North West) Ltd object to Policy 14 on the basis that it is unduly prescriptive. Housebuilders and developers calculate financial viability on the basis of the total amount of square feet that can be accommodated on site. The total amount of square footage and achievable sales values will be heavily influenced by a policy which seeks to prescribe the size and type of dwellings on a site. Such a policy can therefore have a detrimental impact on a site's financial viability and can constrain sales rates. Notwithstanding the above, Clowes Developments (North West) Ltd would also point out that the percentages do not add up to 100%. The percentage of housing sizes for affordable is also considered to be unhelpful as it does not reflect any Registered Social Landlords requirements or available funds. Clowes Developments (North West) Ltd believe the Policy should be deleted and that housing mix should be decided by the market.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

The text of the plan actually states that the percentage figures within the policy do not sum to 100%. This emphasizes that the policy approach is flexible.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

ID1:

693

comment\_author:

Chestnut Homes

comment content:

It is acknowledged in the planning policy that new development should aim to secure a mix of property types to meet the varying housing needs within the Local Plan area, to include for both market and affordable housing. The danger is such policies can become too prescriptive and unworkable, with the market changes over the life of a Local Plan making specific approaches difficult to justify. We believe the market should decide appropriate mix of dwellings, particularly in relation to the market housing, as this will give the greatest chance of achieving the overall housing numbers required within the Local Plan period. At paragraph 5.4.5 reference is made to minimum space standards in national guidance and we would suggest this is omitted. There is potential to affect viability if costs are increased due to higher space standards.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Reference to minimum space standards is provided and this is not stated as higher space standards. A good developer will not want to let the viability of development compromise a basic standard of accommodation that is unattractive to the market or provides a living space unsuitable for inhabitation.

Officer Recommendation:

No change to the Policy is recommended.

ID1:

694

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

Policy 14: Providing a Mix of Housing We support the efforts to identify the mix of housing to meet the needs of the wider area. This will help developers decide which form of development would be successful in each area. It is not appropriate, however, for each site to echo the split of house types required to meet the entire district's need. The nature of each site regarding size, constraints and topography will influence the type of development that can be delivered. Another factor will be the Mix of Housing already present in a specific location, which may have an imbalance that needs to be addressed and the role that settlement plays in the wider area. Policy 14 should be amended to ensure that these various factors are taken into account, and it should not promote a set mix of house types on every development regardless of the demands of the area. The policy should also be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Starter homes are being assessed in reviews of the Whole Plan Viability Assessment and Objectively Assessed Housing needs.

Officer Recommendation:

No change with regard to the approach of Policy 14 is recommended.

That the provision of Starter Homes is reconsidered when further evidence is available.

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

ID1: 695 comment\_author: Studio 11 Architecture Ltd

comment content:

This policy is appropriate for affordable housing but not for market housing. The choice of the Option B approach is fundamentally the incorrect approach. Developers are in the best position to respond to market needs and as such should be allowed to do so. Affordable Housing mix should be based on demonstrable need. Developers should be able to provide a different housing mix if their own market research indicates need/ demand in a particular area at a particular time. This policy needs more flexibility in its wording to allow appropriate housing delivery over the life of the plan.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

The housing mixes across market and affordable house types are objectively assessed. It is appropriate for the Local Plan to provide this Policy guidance.

Officer Recommendation:

No change to the Policy approach is recommended.

ID1: 696 comment\_author: Chris Atkinson

comment content:

Policy 14 " Providing a Mix of Housing Our Client objects to Policy 14 as it is considered that the housing mix for residential development should be considered on a case by case basis and should be market led. In addition, the Policy as currently worded does not account for viability and the wording of the Policy should be amended to allow greater flexibility for developers.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Officer Recommendation:

No change to the Policy approach is recommended.

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

ID1: 697 comment\_author: Lincolnshire County Council

comment content:

Strategic Planning Comments In contrast to Central Lincolnshire neither Policy 14 nor the text mention accessibility standards. Local authorities have the discretion to require higher standards than in Building Regulations through Local Plans. (See also the Public Health comments below.) It is not clear why the mix of needs for Boston d s not add to 100%. These are not precise figures; they should be seen as guides and could be adjusted in the final Policy.

Officer Comment:

Accessibility standards are not a consideration of Policy 14. Accessibility requirements are considered under the Design of New Development Policy.

Higher design standards have been considered in the preparation of the Plan but such an approach is difficult to evidence to meet the exceptional circumstances the government expects. The Objector does not provide evidence.

That the figures do not sum is deliberate and provides flexibility in assessing proposals.

Officer Recommendation:

No change to the Policy is recommended.

ID1: 698 comment\_author: Waller Planning

comment content:

Whilst we understand the general benefit in having some guidance on the mix of housing to be provided, particularly from the point of view of the affordable housing element, this policy needs to be more flexible. As drafted, it would require future housing provision to conform to a prescriptive mix for the next 20 years. It would be helpful if the Policy could include a mechanism by which it might be updated over time, to respond to changing housing needs. It would also be appropriate to have a greater degree of flexibility in the range of provision required, to allow developers to vary the mix of housing they offer on the basis of their own local market research into the demand for housing. Demand is an important factor of housing need, as noted in paragraph 159 of the NPPF. It is not appropriate for a policy like this to be excessively prescriptive, as this would remove the ability to respond to changing market requirements over time, and it may lead to households being accommodated in housing which is not suitable for them. This would effectively undermine the purpose of Policy 14. The comments about flexibility, which are included in the supporting text, should therefore also be better reflected in the Policy s text.

Officer Comment:

The Policy is based upon information from the two SHMAs and therefore can only be at the strategic scale. The Policy allows site specific variations to be justified.

Officer Recommendation:

No change to the Policy is recommended.

Post\_title: **5.5 Affordable Housing**

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

ID1: 699 comment\_author: Andrew Burling

comment content:

Policy 15 We are pleased to see that the viability of the Boston area has been considered when setting the level of proposed Affordable Housing delivery on new developments. We also recognise that this policy will also be subject to specific viability testing on sites where the provision of Affordable Housing along with other community and infrastructure requirements results in developments becoming unviable. We note that there is a need for other types of Affordable Housing such as older people housing and disabled housing and suggest that where developers provide this accommodate through S106 that there is recognition of the additional cost and land take through reduction in the number of overall provision to be provided.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 700 comment\_author: G R Merchant

comment content:

has put forward a site for consideration, which is behind the new houses built on Main Road. The proposal would be supported by criterion 2 of this policy.

Officer Comment:

To be considered as a site specific proposal

Officer Recommendation:

No Change to Policy 15 is recommended

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

ID1: 701 comment\_author: Mrs E Whettingsteel

comment\_content:

The Councils proposal for the delivery of affordable housing on site of 10 dwellings or more is also supported. However, it is suggested that affordable housing contributions are sought on the basis of a sliding scale, for example: Sites of 10 units or less 0% Sites of 10 to 25 units 15% Sites of 25 to 50 units 20% Sites of 50 to 100 units 25% Sites of 100 units or more 30% This approach is used successfully in other rural Local Authority areas.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

ID1: 702 comment\_author: Longstaffs

comment\_content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.  
  
Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 703 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

---

ID1: 704 comment\_author: Longstaffs

comment content:

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Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 705 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

---

ID1: 706 comment\_author: Longstaffs

comment content:

In respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units. If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 707 comment\_author: Longstaffs

comment content:

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Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 708 comment\_author: Longstaffs

comment content:

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Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 709 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 710 comment\_author: Longstaffs

comment content:

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Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 711 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 712 comment\_author: Mr Andrew Parks

comment content:

As for the nominated development areas I fully support the need for additional housing and affordable housing in particular.

Officer Comment:

Support

Officer Recommendation:

No change to the approach is recommended

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

ID1: 713 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 714 comment\_author: Longstaffs

comment content:

“ land at Horsesh Road, Spalding in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

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Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 715 comment\_author: Longstaffs

comment content:

we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 716 comment\_author: Longstaffs

comment content:

we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units. If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 717 comment\_author: Longstaffs

comment content:

we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 718 comment\_author: Longstaffs

comment content:

we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

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Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1:

719

comment\_author:

Mr A Fisher Boston Borough Coun

comment\_content:

The LHA would ask the Joint Planning Committee to consider how the draft may be amended to ensure that developers seeking to avoid contributions by proposing a number of schemes of less than 10 homes on the same site are restricted from doing so.

Officer Comment:

Whilst the Policy will have to be re-cast to state 11 or more dwellings (in accordance with a legal ruling) it will be necessary to provide policy terms to resist the deliberate under development of sites as a means to avoid meeting infrastructure and affordable etc. obligations.

Officer Recommendation:

That the Local Plan approach provides safeguards to resist the deliberate under development of sites.

ID1:

720

comment\_author:

Longstaffs

comment\_content:

we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 721 comment\_author: Longstaffs

comment content:

Fle010 we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 722 comment\_author: Longstaffs

comment content:

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Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 723 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 724 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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

ID1: 725 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

ID1: 726 comment\_author: Brian & Lesley Chittim

comment content:

We fully support the provision of affordable housing. We have four grandchildren who will no doubt be seeking accommodation in the not too distant future. Also we see the need to incorporate, as fully as we can, all the newcomers to the area from a range of ethnic backgrounds and nationalities. On this latter point it will be important not to isolate these essential workers at the fringes of the village settlements.

Officer Comment:

Support

Officer Recommendation:

No change to the Plan is recommended

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

ID1: 727 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence.

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ID1: 728 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1: 729 comment\_author: Aspbury Planning Limited

comment content:

We support the principle of variable affordable housing rates as there are significant variances in land values across South East Lincolnshire. We do not consider that such approach would add undue complexity to the policy. The alternative approach of maintaining a constant requirement across the whole plan area could be maintained although is likely to result in more viability assessments supporting planning applications seeking significantly lower provision in many areas. We would however promote that a clause be inserted to facilitate negotiations with developers on the level of affordable housing in circumstances where an accurate viability assessment demonstrates that a proposal cannot come forward with the full policy compliant level of affordable housing.

Officer Comment:

There are flexibilities within the Policy and also elsewhere within the Local Plan (e.g. Developer Contributions) where site specific viability in relation to meeting infrastructure and service needs can be assessed.

Officer Recommendation:

No change to the Policy is required.

ID1: 730 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

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Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1: 731 comment\_author: Longstaffs

comment content:

in respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

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Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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ID1: 732 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1:

733

comment\_author:

Robert Doughty Consultancy Ltd

comment\_content:

we support the proposal to require 15% of homes on new housing schemes to be affordable and welcome the flexible approach set out in the policy wording.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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ID1:

734

comment\_author:

Robert Doughty Consultancy Ltd

comment\_content:

We note that the proposed affordable housing policy is based on recent assessments of need and a whole plan viability assessment. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide starter homes.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1:

735

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

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Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1:

736

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that the proposed affordable housing policy is based on recent assessments of need and a whole plan viability assessment. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1:

737

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that the proposed affordable housing policy is based on recent assessments of need and a whole plan viability assessment. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1:

738

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that the proposed affordable housing policy is based on recent assessments of need and a whole plan viability assessment. We also note that the viability assessment demonstrates that the policy aspirations for affordable housing can only be delivered in some circumstances and, even in those cases, where there are no other S106 requirements. The supporting text for the policy should be amended to reflect this fact. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1:

739

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that the proposed affordable housing policy is based on the recent assessments of need and a whole plan viability assessment. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1:

740

comment\_author: Hume Planning Consultancy Ltd

comment content:

The Plan recognises the need for affordable housing and it is recognised that a flexible approach to tenure mix should be taken to reflect the needs of a particular settlement. There is a need for affordable housing in rural areas and if new affordable housing, earmarked for local people means that more of the people in that rural community have a chance to afford to live there, it will help reduce the need for the rural workforce to commute from town to employment in the rural areas. Also, if local business growth means that more people already living in rural communities are able to work locally, commuting into town may be reduced, improving economic and environmental sustainability. If more affordable housing, the majority of which will be market housing led, means people on a broader range of incomes can afford to live there, it may increase the social diversity and sustainability of the community, thereby supporting a broad range of community or community services, shops and work, so people need to travel less not more. Broadgate have a number of sites in the rural villages which are capable of providing the appropriate mix of market and affordable housing and which have been excluded from potential allocation after evaluation in the SHLAA. These are set out below and a case made for their release because Broadgate are of the view that more flexibility is required to accommodate development in the rural areas for the reasons set out above. Accordingly, Policy 2 needs amending. The Peterborough Sub Regional Housing Market Assessment identifies annual affordable housing need in South Holland to be 284 dwellings, while the Boston SHMA identifies a need of 100 dpa. From the most

Officer Comment:

The Rural Exceptions Sites Policy would seem to meet the circumstances sought by the Objector i.e. that a proven housing need specific to an Other Service Centre and Settlement could justify a site coming forward.

Officer Recommendation:

No change to the approach of the Local Plan is recommended

recent Annual Monitoring Report set out in the evidence base to the Plan, the average annual affordable housing provision over the last five years for the South Lincolnshire area has been 130 dpa. The figure in 2012/13 was only 87. There is thus a substantial shortfall in affordable housing which should be made up wherever possible. The lack of affordable housing coming forward at anything like the required rate, exacerbates the problems identified in the Taylor Review. The Framework requires a significant boost to affordable housing, however, over the last five years, the shortage in the Plan area has been significant. The level of affordable housing proposed in the Plan is aspirational and a more realistic requirement would be likely to produce more affordable housing sooner. The current levels suggested are likely to result in stalled sites. To bring affordable housing on stream in what is primarily a rural area, where the majority of households reside and where affordable housing need is greatest, requires a greater range of smaller sites outside the Sub Regional Centres to be allocated than currently identified in the Plan. The Government's emerging initiative to classify low cost market housing as affordable, means that market housing led schemes in the villages, i.e. Beyond the second tier Main Service Centres, are necessary. A greater degree of flexibility needs to be embraced by the policy in terms of the percentage of affordable housing required. The provision of affordable housing bears heavily on viability. Broadgate have their own specific approach to the provision of affordable housing and the definition should be expanded to include this. The Policy needs to recognise the role played by private developers in providing affordable housing. Suggested expansion of definition - Add after it may also be owned by..developers and managed by Local Authorities or

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

private Registered Landlords † and by other persons † ‡

<b>ID1:</b>	741	<b>comment_author:</b>	Robert Doughty Consultancy Ltd		
<b>comment_content:</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
We note that the proposed affordable housing policy is based on recent assessments of need and a whole plan viability assessment. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.	Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.		That Policy 15 is reviewed in the light of new evidence		

<b>ID1:</b>	742	<b>comment_author:</b>	Robert Doughty Consultancy Ltd		
<b>comment_content:</b>	<b>Officer Comment:</b>		<b>Officer Recommendation:</b>		
We note that the proposed affordable housing policy is based on recent assessments of need and a whole plan viability assessment. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to Starter Homes in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.	Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.		That Policy 15 is reviewed in the light of new evidence		

ID1:

743

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

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Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1:

744

comment\_author: Gladman

comment content:

Affordable Housing The provision of affordable housing is a key priority that Councils seek to achieve through their Local Plan. However the only way to improve affordability is to provide housing. If the evidence base suggests that a certain level of affordable housing is required and the local planning authority are not seeking to address this through their Local Plan then the affordability gap will only get worse. Local Plan housing requirements should therefore reflect the full need for affordable housing provision as required by 47 of the Framework if addressing affordability is to be achieved. Gladman note that the draft Local Plan's proposed housing requirement is likely to significantly constrain the scope for addressing affordable housing needs in South East Lincolnshire, with the latest evidence revealing a need to provide 250 affordable homes per annum in Boston and 284 per annum in South Holland, compared to the lower figures set out in policy 15 of 100 and 210 respectively. Gladman believe that South East Lincolnshire should ensure that it plans to deliver sufficient housing to meet its full affordable housing needs. Whilst acknowledging the role of the private rented sector, it is important to recognise that this is not defined as a form of affordable housing in the Framework, and should not be relied upon to address affordable housing needs. South East Lincolnshire will no doubt be aware of the judgement on a Judicial Review bought by Satnam Land Holdings against the adoption of the Warrington Local Plan, which ruled that the housing policies of the plan were not sound due to the failure of the plan to fully consider the delivery of affordable housing with regard to the OAN. It stated that: (a) having identified the

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes. Finally, South East Lincolnshire should note guidance set out in the PPG on Housing and Economic Development Needs Assessments (Reference ID: 2a»O29A20i403O6), which states that The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes.

<b>ID1:</b>	745	<b>comment_author:</b>	Longstaffs
<b>comment content:</b>	<b>Officer Comment:</b>		
<p>3. In respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.</p>	<p>Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.</p> <p>Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.</p>		<p><b>Officer Recommendation:</b></p> <p>That Policy 15 is reviewed in the light of new evidence</p>

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

ID1: 746 comment\_author: Longstaffs

comment content:

3. In respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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ID1: 747 comment\_author: Longstaffs

comment content:

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Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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ID1: 748 comment\_author: Traci Edwards

comment content:

Re: Long Sutton (LOS 006, 009, 019 and 020 specifically): I am concerned about the balance of market and affordable housing on such a large scale development and the impact on the socio-economic profile of the town. With limited economic growth planned for the immediate future, there is a risk that either the rate of affordable housing to market properties will be increased to satisfy an immediate requirement, or that market housing will remain unsold, creating a single, partially occupied, unappealing, out-of-character development in this town.

Officer Comment:

The National Planning Policy Framework requires that each Local Plan area provides enough land to meet its housing needs in the short and long term. Job growth and/or economic forecasts, including the long term operation of existing employers, are only one factor that is taken into account when assessing housing need; the National Planning Practice Guidance identifies that local housing need should also be based on household and population projections (taking account of migration and demographic change), the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand. Therefore it is not accepted that the level of housing proposed will create an imbalance between market and affordable properties

The Local Plan provides a policy framework for the delivery of housing (both market and affordable) and supporting infrastructure all of which could be subject to site specific viability considerations. Built, unsold, unoccupied housing is a very unlikely outcome.

Officer Recommendation:

No change to the Policy is recommended.

Los019, Los006, Los009 and Los020 are not some of the more suitable Potential Housing Sites in Long Sutton and should not be taken forward as Preferred Option Housing Allocations.

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

ID1: 749 comment\_author: Longstaffs

comment content:

3. In respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units . If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1: 750 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1: 751 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

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ID1: 752 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

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

ID1: 753 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

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ID1: 754 comment\_author: Longstaffs

comment content:

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

ID1: 755 comment\_author: Longstaffs

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1: 756 comment\_author: Clowes Developments North Wes

comment content:

Central Government has indicated that it is about to issue new guidance on the definition and deliverability of affordable homes. Clowes Developments (North West) Ltd believe the Policy should be amended to reflect any new Government Policy and reserves the right to submit further representations in this regard when the Government publish its guidance in advance of the Local Plan Examination.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1: 757 comment\_author: Longstaffs

comment content:

respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units. If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies. Overall, on behalf of our clients, we very much support the proposal to include the site Geh 003. It is located close to the village centre, and its development for housing will help support local services. The SHLAA document identifies several positive aspects to the site's suitability for development, with access onto the B1166.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1: 758 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

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ID1: 759 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

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ID1: 760 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

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

ID1: 761 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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ID1: 762 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1: 763 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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ID1: 764 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1: 765 comment\_author: Chestnut Homes

comment content:

We would support the adoption of option B in assessing the affordable housing policy required under this Local Plan. It is clear from the housing needs identified that there will be significant challenges in meeting the identified level of affordable housing need and hence any policy needs to provide flexible and workable mechanisms to maximise the amount of affordable housing that can be provided. This appears to be even more the case with recent changes to Government Policy and potential decreases in the affordable rented housing funding, which will make the provision of this tenure particularly difficult. There appears to be a potential mismatch between the funding availability and the identified housing needs, which will make the success of any such policies even more difficult to achieve. With reference to the specific policy in Boston, a 15% affordable housing provision is suggested. We believe there may be considerable pressure on this percentage on viability grounds for some of the sites given the potential other calls on the relatively low levels of financial contributions that can be achieved within the Lincolnshire area. The Whole Plan Viability Study suggest this could well be the case with good risk costs identified as a potential issue that will reduce this provision. In addition, with current funding availability we are unsure how this will affect the number of units being provided specifically by developers for affordable housing. We are concerned that this may reduce significantly from existing levels as more and more pressure is placed on the limited subsidy available through this source. We therefore conclude that the planning policy is best placed to achieve more affordable housing via an exceptions

Officer Comment:

Comments noted

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

policy and therefore welcome the specific inclusion of this within Policy 15 and 16. We would suggest this Policy 16 needs to be as flexible as possible to maximise the potential of this policy to deliver affordable housing numbers. We believe the policy can equally apply to larger settlements as to rural areas and should therefore be re-worded Affordable Exceptions Sites as opposed to being specifically rural. We also welcome the potential to use cross subsidy on such sites and have been involved in similar schemes where this has successfully worked to provide affordable housing with no other public subsidy to the benefit of the local area. Paragraph 5.6.5 recognises that a framework is created by this Policy 16 for considering proposals rather than identifying specific sites and we welcome this approach. It is more flexible and is therefore likely to be more successful and by not being site specific will not enhance land values on sites to the detriment to the potential delivery of affordable housing on these types of development. We also welcome at paragraph 5.6.6 the recognition that there are different elements of affordable housing such as starter homes or sheltered accommodation, which could utilise such a policy and is the type of flexibility that will be needed going forward if this policy is to be successful.

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

ID1: 766 comment\_author: Mrs L Pears

comment\_content:

Whilst we will always appreciate making houses more affordable my belief is that this has been ill-conceived. Why provide affordable housing if you cannot provide more local jobs? How are young people supposed to buy a house if they cannot find the work? Also if you are removing agricultural land are you not removing the work too!?

Officer Comment:

The need for affordable housing is not directly related to employment. Indeed the need for affordable housing is largely driven by employed people who would not be able to afford to buy or rent without assistance from the government in terms of housing benefits.

The development of agricultural land is necessary to meet the objectively assessed housing needs.

Officer Recommendation:

No change to the Policy is recommended.

ID1: 767 comment\_author: Longstaffs

comment\_content:

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Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1: 768 comment\_author: Longstaffs

comment content:

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Officer Recommendation:

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ID1: 769 comment\_author: Longstaffs

comment content:

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ID1: 770 comment\_author: Longstaffs

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ID1: 771 comment\_author: Longstaffs

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

ID1: 772 comment\_author: Longstaffs

comment content:

we very much support the proposal to include sites Mou 028, 029 and 030, our client owning the area of land (plan 1) providing access to these sites. They complete a form of development close to the village centre, and their development for housing will be a logical infill to the development already in the location, as routinely seen in rural villages, following which, the new housing and families will be able to further support local services.

We do however, wish to ask for consideration to be given to another area of land off Roman Road plan 2, owned by our client, which is adjacent to existing residential development, and has good access to Roman Road, whilst still being very close to the existing village centre and services, as an additional site for consideration as a Potential housing site for the village.

Officer Comment:

Site specific comments unrelated to Policy 15

Officer Recommendation:

No change to the Policy is recommended.

ID1: 774 comment\_author: Longstaffs

comment content:

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ID1: 775 comment\_author: Longstaffs

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ID1: 776 comment\_author: Longstaffs

comment content:

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ID1: 777 comment\_author: Longstaffs

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ID1: 778 comment\_author: Longstaffs

comment content:

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ID1: 779 comment\_author: Longstaffs

comment content:

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ID1: 780 comment\_author: Longstaffs

comment content:

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That Policy 15 is reviewed in the light of new evidence

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

ID1:

781

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

Policy 15: Affordable Housing We note that the proposed affordable housing policy is based on recent assessments of need and a whole plan viability assessment. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to "Starter Homes" in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1:

782

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

Policy 15: Affordable Housing We note that the proposed affordable housing policy is based on recent assessments of need and a whole plan viability assessment. We support the split between identifying an overall need for affordable housing and the proportion that can be provided by individual developments. The policy should be amended to make reference to "Starter Homes" in accordance with recent ministerial statements and emerging changes to the NPPF and the duty placed on local authorities by the Housing and Planning Bill to provide Starter Homes.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. The review is to consider starter homes.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1:

783

comment\_author:

Long Sutton and District Civic Soci

comment content:

Traditional models of housing supply assume that a significant proportion of affordable housing will result by trickle down , i.e. the chain of moves in the market set up when a vacancy is filled at the top of a sales hierarchy. Several properties exchange hands in the chain with one or more affordable homes released at the bottom of the chain. In this part of the Plan area, the normal market operation is frustrated by a strong inward migration of, predominantly older households from the south acquiring homes at median or greater house prices. The purchase chains for the former are therefore set up in the areas they have left rather than locally so the local housing market does not see the benefit. This needs to be addressed by a higher proportion of affordable housing currently addressed by the Plan. That said there is currently no local shortage of market sale housing at threshold prices pointing to a questionable demand for low cost sale housing which Government policy is firmly swinging towards. Affordable housing is a mainstay of community sustainability and more needs to be done in the Plan, particularly in the light of current Government policy to effectively extinguish affordable rented housing from the dictionary to provide the environment where a low waged economy can afford to live and not be displaced by more prosperous inward migrants.

Officer Comment:

Comments noted.

The Objectively Assessed Housing Needs work (although under review) considers the factors raised by the objector. The approach of the Local Plan focusses on delivering development needs for the area taking into account viability etc. The planning system has few or no powers to control who develops land, who buys property and how such factors can distort the local economy.

Officer Recommendation:

No change to the Policy is recommended.

ID1:

784

comment\_author:

Studio 11 Architecture Ltd

comment content:

The proposed target of 15% Affordable Housing within the Boston Borough and 30% Affordable Housing within the South Holland District is unrealistic. Recent viability assessments on Greenfield sites have indicated that only 10% within the Boston Borough (Station Road, Swineshead) and 20% within the South Holland District is viable (Peterborough Road, Crowland). The policy needs to clarify that this proposed level of Affordable Housing provision is subject to viability assessment in accordance with the NPPF.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.  
  
The viability of any particular site will be a consideration of the Developer Contributions Policy.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence  
  
The viability of development is assessed under the Developer Contributions Policy

ID1: 785 comment\_author: Chris Atkinson

comment content:

Policy 15 " Affordable Housing Our Client is encouraged by Policy 15 which sets a threshold for the provision of affordable housing within new developments at 15% within Boston Borough on developments of 10 or more units. Notwithstanding the above, our client notes that no provision is made within the Policy for viability and the policy should be amended accordingly to allow for greater flexibility in the provision of affordable housing. In certain instances the provision of 15% affordable housing may not be financially viable and subject to providing a suitable economic viability assessment, the level of affordable housing can be reduced. It is noted that this is acknowledged in the supporting text, however it should form part of the main body of the policy. As such our Client objects to the Policy as currently worded as it is not effectively or positively planned and would not meet the tests of soundness set out in paragraph 182 of In addition to the strategic and development management policies the Local Plan also includes a proposals map which defines settlement boundaries and proposed housing and employment allocations.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

The viability of any particular site will be a consideration of the Developer Contributions Policy.

It is unclear what specific point is being made with regard to settlement boundaries and proposals map.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

The viability of development is assessed under the Developer Contributions Policy

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

ID1: 786 comment\_author: Lincolnshire County Council

comment content:

Strategic Planning Comments The percentages required on market housing sites will provide far less than the needs identified in A and B above in the same policy. LCC understand from our role as partners that this is for viability reasons (the Whole Plan Viability Study is still in progress), but this needs to be clearly stated in the justification. The challenge of meeting these needs is only covered in para. 5.6.4 under Policy 16, and would be more appropriate under the wider scope of Policy 15. Also in Policy 15 the percentage requirement is given as "at least/about x%". This needs to be stated precisely as one or the other. Public health Comments Affordable housing should be mixed amongst the private housing across the site to engender social cohesion through inclusive and mixed communities. There should be no relaxation of design standards for affordable housing.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Viability is a central consideration of the Developer contributions Policy

Policy 15 has a clear preference for market and affordable housing schemes to be mixed.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

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

ID1:

787

comment\_author:

Campaign to Protect Rural Englan

comment content:

Traditional models of housing supply assume that a significant proportion of affordable housing will result by trickle down , i.e. the chain of moves in the market set up when a vacancy is filled at the top of a sales hierarchy. Several properties exchange hand in the chain with one or more affordable homes released at the bottom of the chain. In parts of the Plan area, the normal market operation is frustrated by a strong inward migration of, predominantly older households from the south and in other parts predominantly lower waged migrants from Eastern Europe. The purchase chains for the former are therefore set up in the areas they have left rather than locally so the local housing market d s not see the benefit. This needs to be addressed by a higher proportion of affordable housing currently addressed by the Plan. Affordable housing is a mainstay of community sustainability and more needs to be done in the Plan, particularly in the light of current Government policy, to effectively extinguish affordable rented housing from the dictionary to provide the environment where a low waged economy can afford to live and not be displaced by more prosperous inward migrants. During the plan preparation period the Government has launched an unprecedented assault on the future provision of affordable housing that threatens the future of sustainable communities, particularly low waged rural communities, reliant on the affordable rented sector and low cost housing for sale (public, quasi-public and private). The shape of future provision of affordable housing through the life of the Plan will inevitably now change fundamentally, putting at risk the plan objectives to secure 30% of the new homes provided as

Officer Comment:

Comments noted.

The Objectievly Assessed Housing Needs work (although under review) considers the factors raised by the objector. The approach of the Local Plan focusses on delivering development needs for the area taking into account viability etc. The planning system has few or no powers to control who develops land, who buys property and how such factors can distort the local economy.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

affordable, even assuming that there is no more legislative tinkering with affordable definitions, funding or general support. This will need the housing provisions of the plan to be kept under constant review to adapt to legislative, funding and market changes.

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ID1: 788 comment\_author: Larkfleet Homes

comment content:

The Interim Statement on Whole Plan Viability identifies that Local Plan policies should be flexible. However it is noted that such flexibility is lacking from Policy 15. We note the large differences between the level of affordable housing to be provided in Boston, 15% to South Holland, and 30% in South Holland. There is no explanation or justification for these figures. We note however in respect of Boston they did carry out an Economic Viability Assessment which provided evidence of the appropriate level of affordable housing that could be asked for after taking into account viability. This is in accordance with the requirements of the NPPF which requires LPAs to viability as well as need before setting policies in respect providing affordable housing. Unless South Holland have a similar report concluding that over 30% is viable, then I am at a loss how they can justify higher figure and remain compliant with the NPPF. In the absence of any such information then I suggest that a figure of 15% should be used for both authorities. In addition, the definition of affordable housing in the Glossary will also require further amendment as a consequence of the Housing & Planning Bill 2015. For the South East Lincolnshire Local Plan to be found sound under the tests of soundness as defined by the NPPF (paragraph 182), the Plan should be positively prepared, justified, effective and consistent with national policy. The JPU should re-consider its proposals as set out in the Draft Plan in order to avoid preparing a Plan which is unsound by failing to be consistent with national policy, positively prepared, properly justified and so ultimately ineffective. This relates particularly to the level of affordable housing being asked for in South Holland.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1: 789 comment\_author: Waller Planning

comment\_content:

The proposed target of 30% affordable housing in South Holland District has been found to be unachievable on a number of residential developments. For instance, planning permission was granted for 50 dwellings at Peterborough Road, Crowland (H02-0775-15), and it was found that it was only viable to provide 10 affordable homes, representing 20% of the total number of dwellings. We are also aware that the Council have accepted the principle of an affordable housing provision of 18% on a proposed residential development at Broad Lane, Moulton (application H13-0013-15, with 7 of 39 dwellings to be affordable). Both of these applications relate to housing on greenfield land, without unusual infrastructure constraints. As such, it cannot be assumed that a target of 30% affordable housing will always be viable. This Policy needs to be amended to confirm that the level of affordable housing to be provided may be subject to an assessment of a development's viability, and a lower level of affordable housing may be provided where necessary. This is consistent with our separate representations concerning Policies 5 and 6. It is also in accordance with the requirements of NPPF paragraphs 173 and 174, and national guidance in NPPG 23b-007-20150326. The cross-reference to Policy 6 in the supporting text is not adequate in this regard, as the Policy must be legible on its own, without the need to read its supporting text. A lack of clarity in this regard has the potential to undermine the Plan's effectiveness. We also note that SHMA 2015 appears to indicate a different (higher) level of affordable housing need to that stated in the Policy 15.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence. Viability is a central consideration of the Developer Contributions Policy.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

ID1: 1731 comment\_author: Longstaffs

comment\_content:

3. In respect of other policy proposals, we propose that affordable housing proportions in Boston Borough and South Holland should be the same, and request amendment to Policy 15, such that the rate be altered to 'at least 15% of total dwellings being affordable housing across the district, for developments of 10 or more units'.  
If a differential rate is applied to the two sub-districts, it could lead to development being favoured in Boston district settlements, instead of South Holland district settlements, which would not be in accordance with Local Plan policies.

Officer Comment:

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Boston and South Holland have different housing needs to be met (including affordable housing) and different site viabilities. There are too many variables to be considered to be able to conclude that one area will be more favoured by developers over the other.

Officer Recommendation:

That Policy 15 is reviewed in the light of new evidence

## Post\_title: 5.6 Rural Housing Exception Sites

ID1: 790 comment\_author: Aspbury Planning Limited

comment\_content:

We support the preferred Option C. For South East Lincolnshire to deliver the high level of affordable housing required, sites not normally considered suitable for housing can be brought forward to meet specific local housing needs.

Officer Comment:

Support noted

Officer Recommendation:

No change to the Policy Approach is recommended

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

ID1: 791 comment\_author: Surfleet Parish Council

comment content:

We support the provisions suggested for rural exception sites. This will allow for appropriate development outside the settlement boundaries.

Officer Comment:

Support noted

Officer Recommendation:

No change to the Policy Approach is recommended

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

ID1: 792 comment\_author: RPS CGMS

## comment content:

As stated above, any reference to settlement boundaries should be removed from the draft Local Plan. The wording of this policy implies that Rural Exception Sites for affordable housing, starter homes or specialist housing could be located outside the settlement boundaries but must adjoin them. Paragraph 54 of the NPPF does not refer to spatial limitations. It simply states that local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. The draft Local Plan does not cover all the considerations that should be balanced to understand whether a Rural Exception Site is appropriate for development, notwithstanding its proximity with a centre or a settlement boundary. The policy should be reworded to avoid unnecessary limitations to the delivery of affordable housing, starter homes or specialist housing. Also this policy should be amended and be informed by the potential implications of the Housing and Planning Bill. Proposed changes: - Remove but adjoining from the first paragraph of Policy 16; - Remove any reference to settlement boundaries; - Replace settlement boundaries with designated centres; - At paragraph 2 replace the settlement with the closest designated centre; - Add Criteria 4 It would be demonstrated that the scheme would not have adverse impact on traffic, highway safety and security, residential amenity, the character and appearance of the surrounding area and would not conflict with adjoining non-residential uses. We submit that the draft South East Lincolnshire Local Plan is unsound because it is not consistent with

## Officer Comment:

The definition of settlement boundaries is the preferred approach of the Local Plan in order to provide a level of certainty to developers and the community where development needs can be met. The Rural Exceptions Sites Policy provides further flexibility but within a framework whereby the local community will be specifically involved.

In a plan area where there are specific constraints and viability issues a strategic approach to development and the delivery of infrastructure is required.

There is nothing provided in the Objector's evidence to show why the Local Plan is not in conformity with the NPPF

Policy 15 is currently under review in order to consider new viability evidence and also updated OAN evidence.

Viability is a central consideration of the Developer Contributions Policy.

## Officer Recommendation:

No change to the approach of the Policy is recommended.

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

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.

ID1: 793 comment\_author: Studio 11 Architecture Ltd

comment\_content:

delivered on sites outside settlement boundaries and funded by market housing is supported. We would however suggest that for viability reasons it is likely that a higher proportion than 50% of market housing may be required and therefore this policy should be reworded to allow for more flexibility. Paragraph 5.6.7 appears unnecessarily prescriptive and will hinder delivery of Rural Exception Sites. The need to meet local need is accepted but the need for general local support within the community is unnecessary. Local need should be evidence based data provided by the District authority. If the need was there but community support was not forthcoming sites would not be delivered over the life of the plan and therefore the need would increase. It becomes a self perpetuating cycle where need is never met by delivery.

Officer Comment:

Given that the focus of Policy 16 is to meet bespoke housing needs for a community a proportion of enabling market housing that exceeds 50% would potentially distort the purpose of the policy especially where, as is put forward by the objector, the community involvement and need for local evidence is diminished or deleted.

It is not accepted that requiring evidence of community support would stop needs being met.

Officer Recommendation:

No change to the Policy is recommended

ID1:

794

comment\_author: Spalding and District Civic Society

comment content:

5.6.3 & Policy 16 Error: Criterion 2 contains no reference to local distinctiveness. Rephrase Criterion 2: 'the scale and design of the development would be in keeping with the role and function of the settlement and its local distinctiveness'.

Policy 16 Justification Somewhere in the Justification we feel there needs to be a caveat that the dumping of generic, off-the-peg urban and suburban housing types and layouts will not be allowed in villages.

Officer Comment:

The Policy has a specific focus on meeting specific local housing needs. All considerations of design and how sites relate to the settlement are provided by other policies in the plan and there is no need to repeat them.

Officer Recommendation:

No change to the policy is recommended

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

ID1:

795

comment\_author:

Campaign to Protect Rural Englan

comment content:

The NPPF consultation and housing policy changes will undermine current rural exception site policy and are likely to render the objectives of this section largely redundant if adopted as proposed. Affordable housing plays a significant role in cementing established rural communities and small extensions to such communities to provide additional housing to meet locality needs is a laudable policy objective which the CPRE supports in general. If the national policy review prevails then such sites may not be able to be retained in the affordable sector in perpetuity, undermining the original intention of the policy and resulting in gentrification, albeit delayed for five years, but ultimately displacing the households that the policy was intended to protect. To counter this, the LPA s could levy a significant infrastructure contribution to such sites that might come forward with some of the proceeds being used to fund affordable housing in perpetuity in the village, perhaps by funding the acquisition of existing property to be held in trust.

Officer Comment:

Comments noted.

No current proposals to change national policy are seen to threaten the approach of Policy 16 as anticipated by the Objector.

Officer Recommendation:

No change to the Policy is recommended

ID1: 796 comment\_author: Waller Planning

comment content:

We support the recognition within Policy 16 that affordable housing in rural areas is likely to require an element of enabling development, in the form of market housing. This approach is consistent with paragraph 54 of the NPPF. Given our comments on Policy 15, concerning affordable housing, it may be that a development of 50% market and 50% affordable housing may still not be viable. In this instance, it would be helpful if Policy 16 could allow greater flexibility, for a higher proportion of market housing to be provided, in order to enable the delivery of affordable housing. This is particularly important given the high level of need for affordable housing, and the constrained housing target which the draft Local Plan proposed (see our representations concerning Policy 11 for further details).

Officer Comment:

Given that the focus of Policy 16 is to meet bespoke housing needs for a community a proportion of enabling market housing that exceeds 50% would potentially distort the purpose of the policy.

Officer Recommendation:

No change to the Policy is recommended.

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Post\_title: **5.7 Accommodation for Gypsies, Travellers and Travelling Showpeople**

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

ID1: 797 comment\_author: Environment Agency

comment content:

Policy 17: We support the policy for accommodation for gypsies, travellers and travelling Showpeople, and in particular point 6 to ensure that sites are provided with appropriate infrastructure for drinking water, waste-water treatment and recycling/waste management. We strongly support the site selection criteria to ensure that they are not located in high risk flood zones, as accommodation is often in the form of caravans and chalet style structures, which are considered highly vulnerable during times of flooding.

Officer Comment:

The support is welcomed.

Officer Recommendation:

No change is required.

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ID1: 798 comment\_author: Historic England

comment content:

Paragraph 11 of policy 17 is welcomed.

Officer Comment:

The support is welcomed.

Officer Recommendation:

No change is required.

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ID1: 799 comment\_author: Mr A R Yarwood

comment content:

Whilst we generally support the draft proposals, and, in particular, Policy 17, we have some concerns. The introductory text states that the need for sites will be "met through the development of the site identified on the Policies Map, and through the determination of planning applications for the development of other, unallocated sites." Given that there is a requirement for 107 pitches, this need cannot possibly be met on a single site, even if a large number are provided through the determination of planning applications for the development of other, unallocated sites. Furthermore, I can find no allocated site on the Policies Map. Clearly some clarification is needed.

The use of two sets of criteria is confusing and unnecessary.

Criterion ii is unacceptable. It is not essential that every site is suitable for mixed residential and business use. Many Travellers do not need to operate their business from their pitch.

Officer Comment:

It is agreed that the location and capacity of any allocated sites should be stated in the policy's justification.

The use of two sets of criteria is essential to distinguish between the differing requirements for permanent residential sites and transit sites.

Whilst it is accepted that not all gypsies and travellers will operate a business from their home, some will. In this context, it is not considered that criterion ii. Is unreasonable.

Officer Recommendation:

Amend the justification to policy 17 to identify the location of any allocations.

No change is needed in response to this objection.

No change is needed in response to this objection.

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

ID1: 800 comment\_author: Lincolnshire Wildlife Trust

comment content:

The Lincolnshire Wildlife Trust supports the eleventh criterion to ensure that developments of gypsy and traveller sites would not adversely affect areas of importance to nature conservation.

Officer Comment:

The support is welcomed.

Officer Recommendation:

No change is required.

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

ID1: 801 comment\_author: Lincolnshire County Council

## comment content:

It is noted that there is an estimated need for 97 permanent pitches over the Local Plan period, but only one site has been allocated and its location and capacity is not stated in the text. Whilst some of this need will arise later in the Local Plan period it is a risk to the soundness of the Draft Local Plan not to allocate enough provision to meet the needs for both deliverable sites in years 1-5 and developable sites year 6 onwards.

LCC note that the need figures quoted have been slightly reduced from those in the 2012 GTAA, although that is still the latest evidence referenced. (The GTAA quoted figures of 34 additional pitches and 10 transit pitches in years 1-5, 17 additional pitches in years 6-10 and 17 additional pitches in years 11-15 whereas the Local Plan proposes 28 additional pitches and 10 transit pitches in years 1-5, 15 additional pitches in years 6-10 and 16 additional pitches in years 11-15).

The one allocated site off Drain Bank, south of Spalding, is adjacent to an existing two pitch site, and it is understood may be intended for relocation of existing occupiers of an unauthorised site elsewhere.

## Officer Comment:

It is agreed that the location and capacity of any allocated sites should be stated in the policy's justification.

The difference between the need figures quoted in the Local Plan and in the 2012 GTAA is explained by the different periods the respective documents cover (i.e. Years 1-5 in the GTAA cover 2013 to 2017, whereas years 1-5 of the Local Plan cover 2011/12 to 2016/17). Thus, whilst all of the GTAA's 'current shortfall' of 20 dwellings needs to be met in years 1-5 of the Local Plan period, only 3 years'-worth of the need arising from household formation between 2013 and 2017 is relevant to years 1-5 of the Local Plan period. A new GTAA has been commissioned, and it is hoped that its assessments of need will be more easily equated to the Local Plan period.

It is correct that the allocated site will allow the relocation of the occupiers of an unauthorised site, and this is part of the GTAA's assessment of the current pitch shortfall.

## Officer Recommendation:

Amend the justification to policy 17 to identify the location of any allocations.

ID1:

802

comment\_author: Campaign to Protect Rural Englan

comment content:

There appears to be no policy provision for residential caravan sites other than travellers, gypsies and circus performer's accommodation. There are a number of existing residential sites in the plan area and demand may grow as an alternative solution to low cost affordable housing on unallocated land in the countryside. CPRE Lincolnshire would resist such applications in principle but would suggest that any such applications be considered using the criteria for gypsies etc. sites and our proposals for the revised wording of Policy 2. Residential caravans are excluded from the Flood Re insurance provisions so may not be able to obtain affordable flood risk insurance for contents if sited in a flood zone. There are a number of instances around the Plan area where farmers particularly have developed temporary caravan sites for migrant workers in areas of flood risk. There appears to be no provision for sites of this type within the plan and again the general provisions of gypsies etc. sites might provide a model for decision making. Finally, tourism growth is a key priority for the LEP and County Council over the life of the Plan with a doubling of growth forecast. There may in the plan period therefore be a growing demand for accommodation for tourists. These may tend to be close to the coastline and in vulnerable positions for potential flooding and occupied by temporary residents with little concept of the dangers they may face in a flood. Particular care in the siting and flood risk mitigation may be required when considering applications for such accommodation.

Officer Comment:

Government guidance requires the Local Plan to include a policy concerned with the provision of adequate accommodation for gypsies, travellers and travelling showpeople, and the criteria set out in policy 17 are specific to gypsy and traveller pitches and travelling showpeople's plots. It would therefore be inappropriate to seek to deal with other potential types of caravan provision within the same policy.

The objector refers to three types of caravan sites that they feel may be provided in the countryside, namely:

1. affordable exceptions sites - proposals for the provision of such accommodation in caravans would be dealt with in exactly the same way as for 'bricks and mortar' accommodation (i.e. judged against the provisions of policy 16 of the Local Plan);
2. temporary caravan sites for migrant agricultural workers - it is considered unnecessary for the Local Plan to contain a policy to deal with a type of development that is proposed only very rarely. Applications for such developments would be judged against the provisions of policies 2, 3, 4, 5, 25, 26, 27, 28, 29 and 30 of the Local Plan; and
3. tourist caravans - it is considered unnecessary for the Local Plan to contain a policy to deal with a type of development that is proposed relatively rarely. Applications for such developments would be judged against the provisions of policies 2, 3, 4, 5, 25, 26, 27, 28, 29 and 30 of the Local Plan.

Officer Recommendation:

No change is needed in response to this objection.

**Post\_title: 5.8 Houses in Multiple Occupation and the Sub-Division of Dwellings**

**ID1:** 803

**comment\_author:** Mr A Fisher Boston Borough Coun

**comment\_content:**

Draft Policy 18 states that the Nationally Described Space Standards in the NPPG14 (or any successor) will be applied to ensure that the occupiers have adequate floor space. The LHA would draw to the attention of the Joint Planning Authority that the NPPG only covers dwellings designed for up to 8 people residing in dwellings containing up to 6 bedrooms. Boston has received a number of HMO applications for schemes proposing to house significantly more than 8 people so reliance upon the national standard presents a set of risks in policy terms as the standard provides no scalable size assessment. In addition to reference to the NPPG standards, the draft at 5.8.12 says that: Additionally, for HMOs specifically, proposals should be in accordance with DASH space standards where appropriate for licensing purposes. The LHA is concerned that unless this statement is included within the Policy 18, it will not carry weight through the Development Control process. 5.8.5 HMOs - should be amended to read The Housing Act 2004 defines what a House in Multiple Occupation (HMO) is. In summary, it is a building or part of a building that is rented out by at least 3 people who are not from 1 household (eg a family) but share facilities like the bathroom and kitchen.

**Officer Comment:**

Noted. Further investigation has been undertaken with regards to application of the Nationally Described Space Standards with SHDC's private housing team and the response received was that they have few licensed HMOs.

**Officer Recommendation:**

No change required in relation to space standards. Change made in relation to DASH space standards as suggested. Definition of HMO amended to reflect suggestion.

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

ID1:	804	comment_author:	Pedals - Spalding's Cycle Action Gr		
comment content:	Policy 18 and Paragraph 5.8.11 We are pleased that good cycling access is acknowledged. Occupants of HMOs and sub-divided dwellings should also have the benefit of secure, covered cycle storage. This deserves to be mentioned in the list of criteria in Policy 18 as well as in Policy 32 and Appendix 4. We suggest that these words should be added to Policy 18: "7. the premises have secure, covered facilities for storing bicycles at ground-floor level" and that items 7 and 8 are renumbered accordingly. Additional words should be included in paragraph 5.8.11: " .... .. services and facilities), and satisfactory on-site storage for cycles."	Officer Comment:	Given that Policy 32: Vehicle and Cycle Parking also covers change of use it is considered that the criteria set out in Part A.1 of that policy would adequately cover the issue of cycle storage in relation to HMOs.	Officer Recommendation:	No change required.

ID1:	805	comment_author:	Hume Planning Consultancy Ltd		
comment content:	Fundamental to the change of use to dwellings in multiple occupation is the effect on the immediate environment by not having any significant adverse impact. This should be fundamental to the policy and proposed changes are set out below. Suggested changes: Recast first line of the Policy to read Where multiple occupation would not have a significant adverse impact on the surrounding area by way of, increased on street parking, impaired highway safety, or by impeding proper access to the area   proposals for   Then remove 3 from the criteria and re-number.	Officer Comment:	This is not the purpose of Policy 18. This policy is designed so as to ensure the creation of suitable HMOs and the effect on the immediate environment is just one of a number of considerations that should be given in achieving this. It would not be appropriate in this instance to attach greater importance to one aspect than another.	Officer Recommendation:	No change required.

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

ID1: 806 comment\_author: Historic England

comment\_content:  
Criteria 3 is welcomed.

Officer Comment:  
Noted.

Officer Recommendation:  
No change required.

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ID1: 807 comment\_author: Lincolnshire Wildlife Trust

comment\_content:  
The Lincolnshire Wildlife Trust supports the third point within this policy to ensure that the creation of houses in multiple occupation and sub-division of homes would not adversely affect the natural environment.

Officer Comment:  
Noted.

Officer Recommendation:  
No change required.

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<b>ID1:</b>	808	<b>comment_author:</b>	Spalding and District Civic Society		
<b>comment content:</b>	<p>Policy 18 8 After 'maintenance' insert 'the street frontage (including front gardens)', . (Will this provision be an approval condition?) Add a further requirement to the policy: that in HMOs of 8 occupants or more there must be a resident manager. 5.8.6 Typo: comma after second sentence, not full-stop. 5.8.10 First sentence: good but unsure how it will be achieved. 5.8.12 First sentence: how d s this square with the conversion of offices to flats, now permitted development? (E.g. Flats are to be created in a Spalding office block, despite their complete lack of any external window or roof light.) 5.8.13 Good, but add requirement for a resident manager in HMOs of 8 occupants or more.</p>	<b>Officer Comment:</b>	<p>It is considered that the maintenance of street frontage (including front gardens) is not something that is enforceable. Each planning application for a HMO is assessed on its own merits to determine if a resident manager is needed and therefore it is not necessary to include this within the policy. Para 5.8.6 has since been re-written and it is considered that a comma is not required. Para 5.8.10 is just supporting text and will not be applied in itself. In terms of flat conversions, the policy will only apply to dwellings that are to be sub-divided (and not offices) given the requirement for planning permission and the fact that they are not covered by permitted development rights like the majority of offices are.</p>	<b>Officer Recommendation:</b>	No change required.

<b>ID1:</b>	809	<b>comment_author:</b>	Lincolnshire County Council		
<b>comment content:</b>	<p>Public health Comments It should be clarified what would be an "acceptable loss" of family dwellings. It is good to see the NPPG Space Standards are to be applied.</p>	<b>Officer Comment:</b>	<p>The word 'unacceptable' does not exist in the current South Holland Local Plan HMO policy and the inclusion of the word "unacceptable" is not critical to the functioning of this policy as this criterion has been effectively applied in South Holland in the past without it. It could therefore be removed.</p>	<b>Officer Recommendation:</b>	Change made for clarity.

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

ID1: 810 comment\_author: Jacqui Woods

comment\_content:

5.9.7. The country side of Lincolnshire is one of the counties greatest assets. The huge skies, the rural villages, the churches and the communities. This aspect of a largely low populated area MUST be preserved.

Officer Comment:

Noted.

Officer Recommendation:

No change required.

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ID1: 811 comment\_author: Aspbury Planning Limited

comment\_content:

We support this policy as it enables properties which are in a state of disrepair to be brought back in to use which assists in retaining a stock of suitable dwellings in rural locations.

Officer Comment:

Noted.

Officer Recommendation:

No change required.

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

ID1: 812 comment\_author: Environment Agency

comment content:

Paragraph 5.9.6: We support the inclusion of text to encourage those replacing dwellings in the countryside to take opportunities to relocate them to areas, within the existing curtilage, which would lead to a reduction in flood risk. We would also suggest that (particularly if relocation is not possible) those proposing development seek other ways of reducing flood risk, for example through raising finished floor levels or incorporating flood resilient construction. Additional text to reflect this would be useful.

Officer Comment:

It is considered that flood risk and flood mitigation measures are adequately addressed in Policy 3: Development Management.

Officer Recommendation:

No change required.

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ID1: 813 comment\_author: Surfleet Parish Council

comment content:

We support the policy for replacement dwellings in the countryside. This will allow for development without encroaching on valuable agricultural land, at the same time keeping to the scale of the replaced building.

Officer Comment:

Noted.

Officer Recommendation:

No change required.

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

ID1:	814	comment_author:	RSPB		
comment_content:	Officer Comment:			Officer Recommendation:	
There is reasonable potential for protected species, especially bats, to be present in existing dwellings in the countryside. The RSPB would recommend that Policy 19 states an ecological survey will be required where species protected under the Wildlife and Countryside Act 1981 are present as in policy 20. In addition we recommend the Habitat Regulations 2010 are referenced as all UK bat species are protected under Annex IV of the Habitats Directive.	Other policies of the Plan would require this. It is unnecessary to repeat specifically for Replacement Dwelling when such policy requirements are conceivably, relevant to all existing buildings and pieces of land.			No change required.	

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ID1:	815	comment_author:	Historic England		
comment_content:	Officer Comment:			Officer Recommendation:	
Criteria 3 is supported.	Noted.			No change required.	

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ID1:

816

comment\_author: Studio 11 Architecture Ltd

comment content:

Paragraph 5.9.4 is not clear and requires clarification. Will conditions be imposed on replacement dwellings to connect to the gas network? That approach would be financially unviable and it is likely that more sustainable methods are currently available such as heat pumps, biomass boilers together with traditional log burning appliances. Justification needs to be provided as to why a high standard of architectural detailing and materials in construction is required. Applications for replacement dwellings should be considered in design terms along the lines of an application on a site inside the settlement boundary. The design of replacement dwellings should be appropriate to the site and its locality and not viewed as a new dwelling within the open countryside. Clarity is required as to why paragraph 5.9.9 is necessary. Restrictive covenants should not be imposed on a replacement dwelling without there being a need for it. Such conditions are only required where a new build dwelling is proposed on previously undeveloped land in the countryside.

Officer Comment:

Paragraph 5.9.4 is not part of the policy wording itself, rather it refers to a suggestion put forward in the Sustainability Appraisal for how the policy could potentially generate more positive impacts. A high standard of architectural detailing and materials of construction is important to protect the rural landscape from visually intrusive development. Point noted regarding paragraph 5.9.9.

Officer Recommendation:

Supporting text should be reworded to provide more clarity as to why a high standard of architectural detailing and materials in construction will be required. Paragraph 5.9.9 should be deleted to reflect the position in the National Planning Policy Frame

ID1:

817

comment\_author: Lincolnshire Wildlife Trust

comment content:

The Lincolnshire Wildlife Trust objects to this policy on the grounds that it should include a reference to protected species. To be consistent with Policy 10 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: 7. The results of ecological surveys indicate that there will be no significant adverse impacts on protected or priority species.

Officer Comment:

Noted. It is considered that the addition of suggested criterion 7 is not required and that this would be covered by Policy 25: The Natural Environment.

Officer Recommendation:

Reference to protected species and ecological surveys should be included in the policy's supporting text.

ID1: 818 comment\_author: Waller Planning

comment content:

We support Policy 19 in principle. However, the reference to the removal of permitted development rights should be made more specific, to relate to extensions to the dwelling, and not to outbuildings. This implies that the removal of these rights should relate only to Classes A and B of Schedule 2, Part 1, of the Town and Country Planning (General Permitted Development) (England) Order 2015. Permitted development rights in relation to Class E of that schedule, relating to the construction of buildings which are ancillary to a dwellinghouse, should not be removed. Paragraph 200 of the NPPF requires clear justification for the removal of permitted development rights. The NPPG states that permitted development rights should only be removed in exceptional circumstances 1. This echoes the wording of previous guidance in Circular 11/95. For further clarification, the Councils may find it helpful to refer to Appeal Decisions APP/D0121/A/12/2183758 and APP/A1910/A/08/2083993, which specifically consider Class E rights in the context of replacement dwellings. We also note that it is not clear why paragraph 5.9.9 of the supporting text is necessary. A restrictive condition should not be imposed on a replacement dwelling without there being a need for it; this principle is set out at paragraph 204 of the NPPF. Such a condition is only required where a new build house is proposed on previously undeveloped land, as envisaged by Policy 21. We therefore suggest that paragraph 5.9.9 should be deleted.

Officer Comment:

The purpose of providing for the removal of Permitted Development Rights in the policy is to protect the character of the countryside and limit the impact on the landscape. Allowing the construction of buildings ancillary to a dwelling house, potentially on a large site, could, in some circumstances, be detrimental to the character and appearance of the countryside. Point noted regarding paragraph 5.9.9.

Officer Recommendation:

Paragraph 5.9.9 should be deleted to reflect the position in the National Planning Policy Framework.