

**Post\_title:** 7.0 Policy Context

**ID1:** 858

**comment\_author:** Mr I Farmer

**comment\_content:**

7.06 Key Issues I would suggest that the 'need to encourage walking and cycling' should be specifically identified as a key Issue to reinforce their importance for environmental and public health reasons. For the climate change bullet point reference should be made to adaption as well as generation of renewable energy.

**Officer Comment:**

This issue is covered by other policies in the plan

**Officer Recommendation:**

No change to the approach is required.

ID1:

859

comment\_author: RSPB

comment content:

The RSPB believe that point 7.0.1 of the Local Plan does not reflect the spirit of the NPPF, and is not satisfactory as an introduction to the environment strategy. The RSPB strongly recommend that point 7.0.1 be reworded to better reflect the NPPF presumption in favour of sustainable development and the requirement of planning systems to provide 'net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures'. This is in line with the Lawton report (1) which calls for bigger, better, and more joined up wildlife sites, and the Natural Environment White Paper commitments to 'establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'. (1) Making space for nature report, available at: <https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today>

Officer Comment:

The paragraph is the introduction to the whole chapter which includes policies on other subjects than natural environment. The Natural Environment policy refers to 'net gain in biodiversity' and mentions restoration, enhancement, connection of natural habitat and help wildlife adapt to climate change. Other responses raise landscape scale habitat provision and this will be considered in response to the Habitats Regulation assessment survey work that is being undertaken.

Officer Recommendation:

Reword para 7.0.1 to make second sentence clearer ... If development is necessary it should seek to protect and enhance the site's important features, and its relationship with other natural and built environment sites, in order to make the best use of the site.

ID1:

860

comment\_author:

Spalding and District Civic Society

comment content:

The Map leaves uncoloured several existing playing fields:

Garth School Field & large playing field next to it should be green, being recreational space.

Nor does it make any attempt to propose new sites for informal public green leisure spaces to make up Spalding's dire shortfall. In an area where the land is almost entirely given over to agri-industrial food production, with virtually no opportunity to simply enjoy the countryside, and where the gardens of new houses get smaller and smaller, this is a serious omission. In repairing it, it is essential to note that the existing provision of such informal green leisure space is very unevenly spread in South Holland, with some communities well served (especially Spalding) and others very generously provided (e.g. Crowland and Holbeach).

Suggested areas:

former Gas Works site (now decontaminated), north end of Cowbit Wash, reinstated Swimming Pool area (after swimming pool is incorporated in new-build leisure Centre at Castle Field).

7.0.1 Welcome emphasis on the importance of good design.

7.0.2 Strongly support, especially the last sentence.

7.0.4 Strengthen: after 'pollution' insert (including visual).

Officer Comment:

The Garth School will be added to the mapping system. The large field to the north of the Garth School has not been added as it was shown as a housing site in the 1998 SHDC Local plan, following which some residential development was undertaken at the front, and public access to it was stopped. Possibly as a consequence it was not shown as open space in the 2007 SHDC local plan.

Developers are only obliged to provide open space to meet the requirements of their developments. However, the Spalding and Pinchbeck Inset Map shows an area of proposed open space adjacent Pinchbeck Road and the new road line, as well as the retention of an area currently managed as a wildlife area, albeit not one that is designated as a "Local Wildlife Site".

Providing land to tackle underprovision will have to be paid for by other means. The north end of Cowbit Wash maybe the most affordable of the suggested sites. The former gas works is likely to be expensive owing to the investment that has been undertaken to clean the site and it being located within Spalding, where built development would be appropriate in principle. No decisions have been taken on whether to redevelop the Castle Leisure Centre and Swimming Pool.

Officer Recommendation:

Add the Garth School playing field to the map. Amend 7.0.4 by adding (including visual) after 'pollution'

Post\_title:

**7.1 The Natural Environment**

ID1:

861

comment\_author: Boston Woods Trust

comment content:

We are responding to the South East Lincolnshire Local Plan 2011-36, Draft for Public Consultation on behalf of the Boston Woods Trust. The Boston Woods Trust is a local charity that was founded in 2001 to provide the people of Boston with a much needed amenity for recreational purposes. It aims to eventually develop a 7 mile roughly crescent shaped corridor of woodland and parkland, to the west of Boston. To date we have developed over 110 acres in 2 sites which have been marked on the plans.

Following talks with Boston Borough Council a possible site for the development of this proposed corridor was marked on Boston Borough Councils long term planning documents. The current Lincolnshire Natural Environment Strategy 2012-18 has BWT proposed development corridor marked. The Boston Woods Trust are surprised and disappointed that this draft plan does not include a potential or safeguarding corridor for green infrastructure. It does show vast areas for Potential Housing Sites, much more than will be required to meet the house building required up to 2036. It also marks a "Safeguarding Corridor" for a proposed distributor road.

The Boston Woods Trust aims and objectives will help to achieve; - Strategic Policies; 1,2,5,7,25,28,30 and 31 as listed in table 2; Strategic Priorities: Sustainable Development, 1 and 3; Economy 4; Environment 7, 8 and 10; Transport 11 and 12; as listed in table 3, and the wishes as set out in section 7, "A Distinctive, Greener, Cleaner, Healthier Environment". It is some relief that the Boston Woods trust Project is mentioned in this section, see 7.1.12.

If the Boston Woods trust is to continue as a thriving

Officer Comment:

The BWT area of search was shown on the "Boston Borough Interim Plan (Non Statutory Development Control Policy) February 2006. It was also subject to policy R9 which has only been used three times in determining planning applications.

Since that plan was prepared the NPPF has been published and delivery has become more important. It is recognised that the BWT's aims contribute to the Strategic Policies and Priorities listed in their comments. As they identify the provision of land is difficult owing to the prices required by vendors and the ability of the Trust to afford them. Owing to this issue it is difficult to justify a land allocation showing an area of search for BWT because it is not clear it will be delivered.

As part of the evidence for this plan the Council has to undertake a Habitat Regulations Assessment. All but recreational pressure has been screened out. Surveys of recreational use on the Wash have been undertaken and concludes that there will be a 10% growth in visitors as a consequence of the proposed residential development. The HRA / Appropriate Assessment for the Local plan concludes that major applications within 10Km of the Wash and development is the Sustainable Urban Extensions are subject to project level HRA to investigate connections and access to the sensitive habitats on the Wash. The Sustainable Urban Extensions will also be required to provide Suitable Alternative Natural Greenspace.

Officer Recommendation:

Boston Woods maybe part of the Suitable Alternative Natural Greenspace for the two Sustainable Urban Extensions in Boston but there maybe alternative solutions. Owing to uncertainty on delivery of Suitable Alternative Natural Greenspace it is not considered the Boston Woods area of search should be shown on the policies or inset maps.

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

local charity, contributing to the local environment, it will need the support of Boston Borough Council. If, as in this draft plan, it is not given the priority of a potential or safe guarding site, as are housing and roads, we fear that our hopes and hard work will mean little. To extend the corridor of woodland and parkland the Boston Woods Trust has to buy land, relying on donations to do this. Now that land owners understand that their land is "Potential Housing Site" it will make it prohibitively expensive and we will not be able to develop in such areas. We would like to meet and discuss these points further and elucidate how much support our project has at Boston Borough Council.

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ID1: 862 comment\_author: Mrs Dorothy Morrison

comment content:

I am concerned regarding Moulton Park which has been under consideration for some time regarding housing and a play area for the children of the village. Following several meetings in the village it is noted that everyone wishes to retain the area for free use and a special area for a children's playground.

Officer Comment:

Retaining this open site is important for the setting and character of Moulton. To this end the site is located outside the Settlement boundary for Moulton, is within the Moulton Conservation area and shown as a Local Wildlife Site.

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: 863 comment\_author: Yvonne Wood

comment\_content:

Fra024: The wildlife on that field would be seriously affected and with more building works in the area they will soon have nowhere to go.

Officer Comment:

Natural England have also identified this site as an area used by Pink Footed Geese. The site has not been chosen as a Preferred Housing Site in the July 2016 consultation.

Officer Recommendation:

No change to the approach is required.

ID1: 864 comment\_author: Natural England

comment\_content:

Natural England concurs with the decision to follow option b, to produce a local policy approach that seeks to protect and, where possible, enhance the natural environment.

Natural England welcomes this policy and considers that it plans positively for the creation, protection, enhancement and management of biodiversity. We suggest however the policy should highlight a strategic approach to planning for biodiversity that is considered at a landscape-scale across local authority boundaries. A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (see below).

We note that reference to a net gain of biodiversity<sup>2</sup> has now been included in the wording, and that ecological networks and green infrastructure have been referenced.

Officer Comment:

Agree.

Officer Recommendation:

The introduction to the policy and its justification highlight a strategic approach to planning for biodiversity that is considered at a landscape-scale.

ID1: 865 comment\_author: Valerie Bryson

comment content:

I have been informed by the RSPB that the habitats of raptors, animals reptiles and plants in Lincolnshire has been massively destroyed due to big business interests [e.g. Dyson], investing in a huge projects such as biomass/ anaerobic digestors/ Solar farms etc. Protect our views, wildlife, heritage before the damage is irrevocable.

Officer Comment:

Natural England have also commented on this plan and identified some sites that maybe used by Pink Footed Geese. As part of the Habitats Regulations Assessment work our consultants will advise on the implications of allocating such sites, should they be required. New open space and the protection of habitats will be required by policies in this plan because green field land will be required to meet the objectively assessed housing needs.

Officer Recommendation:

No change to the approach is required.

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

ID1:

866

comment\_author: RSPB

comment content:

Section A: The RSPB recommend that policy 25 be amended to better reflect the Habitats Regulations (2010) and National Planning Policy Framework (NPPF). With regards to point 1 of policy 25, only under exceptional circumstances would a development that result in a loss to an internationally-designated site be acceptable, and compensation would be required. The RSPB recommend the inclusion of the Habitats Regulations tests in the supporting text for this policy so that readers are informed about the strict tests required for such development, and the exceptional circumstances which would need to occur before development with compensation could be considered. In addition the use of the term significant harm is misleading as it suggests a high level of harm is acceptable. The RSPB recommend that the term significant harm is amended to read adverse effect in line with the Habitats Regulations.

Point 2 of policy 25 relates to paragraph 118 of the NPPF which states: proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the sites notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest The RSPB recommend point 2ii is amended to read the benefits of the development,

Officer Comment:

Accept

Officer Recommendation:

This policy and justification have been rewritten to include suggested changes and the requirements of the HRA.

at this site, clearly outweigh the impacts on the features of the site and 'the wider network of natural habitats; and'. This is an important distinction and better reflects the requirements laid out in the NPPF. Section B: The RSPB support the provisions within section B of policy 25 but believes the wording where possible is unnecessary and should be removed, as there are a number of low cost simple measures to deliver biodiversity benefits which can be incorporated into nearly all developments. Integrating nesting/roosting opportunities into developments as recommended by the Town and Country Planning Association both in their "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity" will help meet the authority's obligations under the NERC Act 2006 and the NPPF. The RSPB is aware that Boston in particular supports a number of swift colonies. Swift populations declined by 38% in the UK from 1995-2012, with lack of suitable nesting cited as one of the causes of this decline. The RSPB would strongly encourage the use of swift bricks on new developments in Boston in particular. The RSPB recommend that point 4 of policy 25 is reworded to include habitat creation, currently point 4 states that conserving and enhancing biodiversity features will provide new habitat but these measures will only retain and improve habitats that are already present. We recommend that Point 4 should be re-worded to read conserving or enhancing biodiversity or geodiversity conservation features and creating new habitat to enhance the existing network and help wildlife to adapt to climate change.

ID1: 867 comment\_author: Roger Bennett

comment content:

Fis001: Wildlife will suffer through the loss of this greenfield land. Currently there is a multitude of animals whose habitat would be lost should the development take place. This includes: bird life (pheasants, lapwings, sparrow hawks, kestrels, great tits, bullfinches to name a few), foxes, hedgehogs, field mice, stoats etc.

Officer Comment:

Habitat surveys maybe required as part of the Development Management process which will advise on the impacts and implications for wildlife. Councils are required to meet their objectively assessed housing need and this will require greenfield land to be developed. Wild life will return to gardens, following development.  
The site has been chosen as a Preferred Housing Site in the July 2016 consultation.

Officer Recommendation:

No change to the approach is required.

ID1:

868

comment\_author:

Mr and Mrs Glynne and Carol Jam

comment content:

We oppose the South East Lincolnshire Development Plan for Boston for the following reasons:- Woodlands and meadowlands provide essential environmental, recreational and educational facilities. Boston Woods Trust have a vision and should be encouraged and facilitated at every opportunity. They do not cost the Council anything, they fulfil an enormous part of the Boston Borough Council's requirements and they maintain their sites with voluntary work parties. On a personal note, site Fen 001 was designated in the 1990 plan and the interim 2006 plan as meadow/woodland and when we purchased our property in 2011 the classification of the land remained the same. When the Boston Woods Chairman contacted the Council in 2014 it was still designated for woodland/meadowland. We would like to reiterate the need for this site to be retained for woodland/meadowland to expand Grange Wood as part of the overall Boston Woods.

Officer Comment:

The BWT area of search was shown on the "Boston Borough Interim Plan (Non Statutory Development Control Policy) February 2006. It was also subject to policy R9 which has only been used three times in determining planning applications.

Since that plan was prepared the NPPF has been published and delivery has become more important. It is recognised that the BWT's aims contribute to the Strategic Policies and Priorities listed in their comments. As they identify the provision of land is difficult owing to the prices required by vendors and the ability of the Trust to afford them. Owing to this issue it is difficult to justify a land allocation showing an area of search for BWT because it is not clear it will be delivered.

As part of the evidence for this plan the Council has to undertake a Habitat Regulations Assessment. All but recreational pressure has been screened out. Surveys of recreational use on the Wash have been undertaken and concludes that there will be a 10% growth in visitors as a consequence of the proposed residential development. The HRA / Appropriate Assessment for the Local plan concludes that major applications within 10Km of the Wash and development is the Sustainable Urban Extensions are subject to project level HRA to investigate connections and access to the sensitive habitats on the Wash. The Sustainable Urban Extensions will also be required to provide Suitable Alternative Natural Greenspace.

Officer Recommendation:

Boston Woods maybe part of the Suitable Alternative Natural Greenspace for the two Sustainable Urban Extensions in Boston but there maybe alternative solutions. Owing to uncertainty on delivery of Suitable Alternative Natural Greenspace it is not considered the Boston Woods area of search should be shown on the policies or inset maps.

ID1: 869 comment\_author: Chestnut Homes

comment content:

We fully support the policy objectives surrounding the natural environment and recognise the benefits this can bring to the overall district, particularly when incorporated in an appropriate way within on-going developments.

This is always however a balanced approach and there must be a recognition that if the benefits of such developments will outweigh the potential impacts and with appropriate mitigation measures provided, they can be acceptable.

The designation of specific sites, as outlined within this policy at paragraph 7.1.5, is helpful in ensuring the most important areas are afforded greater protection. However, there are occasions when the designation of such large areas such as the local wildlife sites need to be reviewed to ensure that the whole of the area is contributing to the overall objective of the designation. One such instance is in relation to the Witham Park Countryside Park where part of the site which is on the edge of the designation is, in our opinion, more appropriate as a residential site as an extension of existing housing development site. Attached at Appendix One is a plan outlining the area of land felt to be more appropriate for a residential allocation.

Officer Comment:

The site referred to is part of 'Witham Way, Antons Gowt to Boston' Local Wildlife Site. Local Wildlife sites should be surveyed regularly. This site was surveyed in 2007 and 2012 and assessed against, and met, the requirements of the Local Wildlife Sites Guidelines for Greater Lincolnshire. They are termed Local Sites as they are determined locally but their significance for nature conservation may be far greater because of their comprehensiveness. For comparison SSSIs are designated on a representative basis e.g. It is only necessary to designate a site representing one of each type of habitat. For Local Sites every site that meets the criteria is supposed to be designated and in this way Local Sites "fill the gap" in other designation systems. The system is coordinated by the Greater Lincolnshire Nature Partnership and they are designated by each Local Authority. Since the site has met the criteria it is not considered appropriate to amend the boundary as suggested at this time. Boundaries are amended when the survey data is being assessed and this may be shown to be appropriate when the site is next surveyed.

Footnote: The owner of the land has requested Boston BC surrenders the land, which they lease. A planning application has been submitted to develop the site. The LWS designation is a material planning consideration.

Officer Recommendation:

No change to the approach is required.

ID1:

870

comment\_author: Woodland Trust

comment content:

Under policy 25, we endorse the comments of Natural England in that we would like to see reference to the need to plan green infrastructure strategically at a landscape scale by looking across the boundaries of neighbouring local authorities. We would like to see reference in the plan to the need to give irreplaceable habitats such as ancient woodland and ancient and veteran trees the strongest possible level of protection. We favour the recommendation in the CLG Select Committee's review of the NPPF in which they argued that ancient woodland and/or ancient or veteran trees should only be damaged by development in wholly exceptional circumstances. Natural England's Standing Advice on Ancient Woodland gives some useful advice to local authorities on how to handle planning applications affecting ancient woodland and includes such issues as putting in place appropriate buffering strips to guard against damage to ancient woodland which is adjacent to our near a development site. We support the reference in para B4 to the need to create new habitat to enable wildlife to adapt to the impact of climate change. In this respect, we commend the aspirations and work of the Boston Woods Trust in seeking to develop a network of new woodland and other habitats around Boston and we are pleased to see this work referenced in para 7.1.12 in the supporting text to policy 25. You mention that RSPB owns sites in the area covered by the plan. Woodland Trust also owns and manages a small number of woods and details of these can be found at <http://www.woodlandtrust.org.uk/visiting-woods/map/Punchbowl%20Lane,%20Boston,%20PE21%208/52.992698669433594/-0.0638199970126152/10>

Officer Comment:

Agree. As part of the evidence for this plan the Council has to undertake a Habitat Regulations Assessment. All but recreational pressure has been screened out at present. Surveys of recreational use on the Wash have been undertaken and if they show that further residential development will increase the recreational pressure upon the Wash, there will be a need for developers to provide natural and semi natural greenspace, which will help biodiversity linkages as well as meeting health and well being criteria. This will provide evidence for a strategic approach. Ancient and Veteran trees are covered by reference to habitat and biodiversity. The Woodland trust's sites will be referred to.

Officer Recommendation:

7.1.12 to refer to two Woodland Trust sites. Enos Wood and Westgate Wood.



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

ID1: 871 comment\_author: Lincolnshire Wildlife Trust

## comment content:

The Lincolnshire Wildlife Trust strongly supports this policy and its aim of a high quality, comprehensive network of inter-connected designated sites, sites of nature conservation importance and wildlife friendly greenspace. However, we would recommend that there is specific reference to Nature Improvement Areas within this policy as there is the potential for NIAs to be designated locally within the life time of the Local Plan. The Central Lincolnshire draft Local Plan includes the following in its biodiversity policy (Policy LP23: Biodiversity and Geodiversity): Where development is within a Nature Improvement Area (NIA), it should contribute to the aims and aspirations of the NIA. We would therefore recommend that additional text is added to point 4 of this policy to read:

4. conserving or enhancing biodiversity or geodiversity conservation features that will provide new habitat and help wildlife to adapt to climate change, and if the development is within a Nature Improvement Area (NIA), contributing to the aims and aspirations of the NIA.

7.1.3: We strongly support the intention that this policy should maximise opportunities for creation, restoration, enhancement and connection of habitats and species. However, we would recommend that the reference to the UK Biodiversity Action Plan (BAP) is removed as this was replaced in 2012 by The 'UK Post-2010 Biodiversity Framework'. Habitats and species which were previously considered priorities under the UK BAP remain as those of principal importance listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Table 6: The figures contained within the table do not

## Officer Comment:

Agree.

## Officer Recommendation:

This policy and justification have been rewritten to include suggested changes and the requirements of the HRA. In addition:

Amend point 4 to include:  
and if the development is within a Nature Improvement Area (NIA), contributing to the aims and aspirations of the NIA.

Remove UK Biodiversity Action Plan (BAP) and replace with 'UK Post-2010 Biodiversity Framework'

Update the table to:

Name	within SEL	within 15km of SEL
ramsar		4
sac		7
spa		3
sssi	2	48
nrr	1	4
lnr	3	2
rspb	2	3
lws	81	L206+C117+N9

Alter last sentence of 7.1.13 3rd bullet point to read:  
"At present there are no NIAs in South East Lincolnshire but potential exists for designation during the lifetime of the plan: for example the South Lincolnshire Fenlands"

Alter 7.1.14 The third bullet point should be amended to read: This includes Willow Tree Fen Nature Reserve in South Holland, which is owned and managed by the Lincolnshire Wildlife Trust.

match those held by the GLNP, we would recommend that up to date figures are requested and included in the table. Additionally it is not clear why a 15km buffer has been used but then sites within this area falling outside of Lincolnshire have not been included in the counts. If it is considered that a 15km buffer is appropriate, eg for internationally designated sites, then these should be included whether or not they lie within the Lincolnshire boundary.

7.1.10: The list of locally designated sites should also include Sites of Nature Conservation Importance (SNCIs). These sites were the predecessor of Local Wildlife Sites (LWSs), many have now been resurveyed and assessed under the LWS system, however some still remain and should be treated with equal importance until such time as survey information proves otherwise. LWSs and LGSs are selected by the LWS Panel (organised by the Greater Lincolnshire Nature Partnership) and designated by the relevant local authority. The sites are selected on the basis of criteria relevant to Lincolnshire and in the context of panel member's knowledge of nature conservation within the county, LWSs and LGSs should therefore be considered to be of at least county importance for nature conservation. They can in some cases be of the same ecological importance as SSSIs. We would recommend that "local" should therefore be removed from in front of "importance for nature conservation". At present there are no Nature Improvement Areas in the plan area, however it is possible that within the lifetime of the plan the South Lincolnshire Fenlands may apply to the Greater Lincolnshire Nature Partnership to become a locally designated NIA. We would wish to see recognition of this in the Local Plan and would recommend that the final sentence of this paragraph is amended to the following: "At present

Alter 7.1.15 "...the priority habitats and species in South East Lincolnshire identified under the UK Post-2010 Biodiversity Framework, Section 41 of the Natural Environment and Rural Communities Act (2006), the Lincolnshire Nature Strategy (formerly Lincolnshire Biodiversity Action Plan) and the Lincolnshire Natural Environment Strategy."

there are not any in South East Lincolnshire but there is the potential for NIAs to be designated locally within the lifetime of the plan, for example the South Lincolnshire Fenlands".

7.1.11: We welcome the intention for planning proposals to minimise impacts on existing biodiversity and to maximise the gains in biodiversity that can be achieved through development. The reference to the NERC Act should be amended to read "Section 41 habitats and species of principal importance". The second sentence should also be amended to read "use of bird nest or bat roost boxes".

7.1.12: The Lincolnshire Wildlife Trust has a number of nature reserves in the South East Lincolnshire plan area, including Willow Tree Fen. The second bullet point should be amended to read: This includes Willow Tree Fen Nature Reserve in South Holland, which is owned and managed by the Lincolnshire Wildlife Trust.

7.1.13: This paragraph should be amended in recognition of the fact that in July 2012 the UK Biodiversity Action Plan was been withdrawn and replaced by the 'UK Post-2010 Biodiversity Framework'. The species and habitats that were covered under the UK BAP are still considered priorities under Section 41 of the Natural Environment and Rural Communities Act (2006). We would recommend that the final sentence is amended to read: "the priority habitats and species in South East Lincolnshire identified under Section 41 of the Natural Environment and Rural Communities Act (2006), the Lincolnshire Nature Strategy (formerly Lincolnshire Biodiversity Action Plan) and the Lincolnshire Natural Environment Strategy."

ID1:

872

comment\_author:

Greater Lincolnshire Nature Partn

comment content:

Policy 25 - Support The GLNP supports this policy and the strong wording for the protection, enhancement and management of natural assets. As the policy recognises protection is the first step but we must go further as it is not enough to protect the remaining biodiversity, enhancement is critically important as Lincolnshire's wildlife areas do not currently represent a coherent and resilient ecological network.

Management of these areas is the final step to ensure that the habitats and species they contain can thrive in the long term. The GLNP also supports the recognition of geodiversity within this policy.

7.1.5 - Object The GLNP statistics for the numbers of protected sites within South East Lincolnshire differs from the numbers listed in the plan. Some numbers, such as LWSs may differ due to recent recommendations for designation. The GLNP are happy to discuss these figures if necessary.

7.1.10 - Object The GLNP objects to part of the second bullet point of this paragraph for two reasons. Firstly: "LWS and LGS are non-statutory areas of local importance for nature conservation" is inaccurate.

Defra guidance\* on Local Sites states that these sites are actually of substantive nature conservation interest and that it is a comprehensive suite of sites to be determined locally according to national, regional and local biodiversity needs. To this end Local Sites may actually contain species or habitat of national, regional or local importance therefore it is incorrect to say they are of local importance for nature conservation. They are termed Local Sites as they are determined locally but their significance for nature conservation may be far greater because of their comprehensiveness. For

Officer Comment:

The reasons that the figures do not tally with GLNP is that there are some sites in Norfolk and Cambridgeshire within 15km of the County boundary.

Officer Recommendation:

This policy and justification have been rewritten to include suggested changes and the requirements of the HRA.

comparison SSSIs are designated on a representative basis e.g. It is only necessary to designate a site representing one of each type of habitat. For Local Sites every site that meets the criteria is supposed to be designated and in this way Local Sites "fill the gap" in other designation systems. \*Defra (2006) Local Sites: Guidance on their Identification, Selection and Management.

Secondly: "They are designated by the Greater Lincolnshire Nature Partnership" is inaccurate. LWS and LGS are non-statutory sites, as the paragraph states, the Greater Lincolnshire Nature Partnership (GLNP) are the coordinators of the system under Service Level Agreement to Boston Borough Council and South Holland District Council. An expert sub group of the GLNP, a separate group each for wildlife and geological sites selects the sites that meet the criteria. These are then passed to the relevant local authority for designation. The GLNP has no delegated powers. As such the GLNP recommends rewording this section to: "They are designated by each Local Authority and the system is coordinated by the Greater Lincolnshire Nature Partnership"

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ID1:

873

comment\_author:

Campaign to Protect Rural Englan

comment content:

This is generally supported. CPRE Lincolnshire would however like to see specific mention made in the Plan about the retention and management of existing hedgerows. Intensive farming methods and application of the CAP in the past have seen progressive denudation of habitat provided by hedgerows which perform an important function in both the ecology and appearance of the countryside. They also act as important screens to new development which reduces visual intrusion into an otherwise flat landscape. We believe that there should be a presumption in policy against the removal of established hedgerows and that management plans should be a conditioned to ensure their long term survival.

Officer Comment:

We cannot provide a presumption against the removal of established hedgerows because the Hedgerow Regulations 1997 allow their removal in certain circumstances without formal permission. If permission is required and it is considered the hedgerow is important, according to the criteria set out in the regulations, the council may prohibit its removal by issuing a hedgerow retention notice. Those who remove a hedge without permission can be prosecuted and fined, and may have to replant the hedge.

Section B of Policy 25 refers to protecting biodiversity and minimising the fragmentation of habitat. Plans to develop a site which indicates the removal of a hedge, without good reason, is not complying with this.

Officer Recommendation:

No change to the approach is required.

ID1:

874

comment\_author:

Lincolnshire County Council

comment content:

Public health Comments: Opportunities for public recreation, where appropriate, and conservation based tourism should be referenced given the benefits of increased physical activity, improved mental wellbeing and economic development.

Officer Comment:

Para 7.1.14 refers to health and well-being and tourism.

Officer Recommendation:

No change to the approach is required.

Post\_title:

**7.2 The Historic Environment**

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

ID1: 875 comment\_author: Jacqui Woods

comment content:

The historical architecture in Spalding and the surrounding areas - is beautifully preserved and must be maintained and preserved and should be used in any way possible to ensure that preservation. I especially think of the old Johnson Hospital, a beautiful building , Ayscoughfee Hall, the warehouse buildings along the river that are largely residential and so many of the houses and retail buildings in town that are currently preserved. Keep it that way! So many towns and cities in Britain knocked down their architectural heritage in the sixties and built monstrosities instead. South Holland is so very lucky in this respect. Incidentally, the river is a very special part of Spalding. It must be preserved. So must the water taxi service a unique tourist service. The council must maintain the delightful and slightly old fashioned look and feel of the retail buildings and shop fronts in the town of Spalding. It has a charm that is found in few towns around Britain never modernise too much. It is too good to ruin with modernisation.

In conclusion, take great care with this local plan and its implementation. The area of South Holland is unique and charming and needs to be preserved as such. Of course, new housing and transport is an on-going requirement and this is a long-term plan. But you have much to potentially destroy if care is not taken at all stages.

Officer Comment:

Agree

Officer Recommendation:

The policy seeks to influence development proposals so that Spalding's, and others towns, heritage is protected.

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

ID1: 876 comment\_author: Sutton Bridge PC

comment\_content:

There is no reference within the Plan to Conservation Areas in Sutton Bridge. Documents relating to such areas were fully prepared by South Holland District Council (SHDC) ten years ago. The proposals need to be reinstated and acted on as quickly as possible; buildings of historical interest have already been lost in the Parish.

Officer Comment:

The designation of conservation area is a function retained by South Holland District Council. It is not one for SE Lincolnshire Joint committee, which only has a plan making function.

Officer Recommendation:

No change to the approach is required.

ID1: 877 comment\_author: Brian Collins-McDougall

comment\_content:

Sutton bridge has a historic area that merits protection as a conservation area, South Holland District Council have already done preliminary work in the designation of a conservation area but did not proceed because of alleged lack of money. The parish council have asked for a Conservation Area to be created. Despite this there is no mention of it in these proposals. A council officer suggested when questioned about this at the public exhibition at the Curlew Centre that it did not fall under the remit of the Local Plan. A strange and inconsistent claim as reference is explicitly made to 24 conservation areas in South East Lincolnshire. Why is the request for Sutton Bridge to have a designated conservation area being ignored again ?

Officer Comment:

The designation of conservation area is a function retained by South Holland District Council. It is not one for SE Lincolnshire Joint committee, which only has a plan making function. The plan quite properly refers to conservation areas as it will affect how development proceeds in a conservation area.

Officer Recommendation:

No change to the approach is required.

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

ID1:

878

comment\_author:

Country Landowners Association

comment content:

Finally we consider Policy 26: The Historic Environment to be sensible and pragmatic.

Officer Comment:

Accept

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:

879

comment\_author: Historic England

comment content:

South East Lincolnshire contains a wealth of heritage assets which play an important part in the local character and identity of the district. It is therefore important that this resource which includes both designated and non-designated heritage assets, is recognised, protected and, where possible, enhanced within the new Local Plan. Specifically, it is important that the local plan addresses the value of South East Lincolnshire's historic environment, and the risks it faces, in a commensurate manner. An unusual degree of care will need to be taken in preparing policies so that they play to the strengths which reside in the district's heritage, and are clear how development should conserve and enhance it. We have undertaken an initial desk-based review of the policies and individual sites looking at the potential impact of the proposals on designated heritage assets and those areas of high archaeological potential, that appear in our records, including nationally important archaeology. Clearly, you will need to seek the advice of the Historic Environment Record (HER) and County archaeological advisors on undesignated sites. Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment or object to any proposals that come forward as part of the Local Plan. We have the following initial comments on the proposed sites, which builds on our previous responses made in June 2015 by my colleague Claire Searson and June 2013 by Tom Gilbert-Woolridge. Where we have not commented on a site, it is because we are not aware of any issues with regard to designated heritage assets or areas of high archaeological value, but there may be potential

Officer Comment:

Conservation advice has been sought in relation to proposed sites as part of choosing the preferred sites.

The web links do not appear to work.

Officer Recommendation:

Refer to the Historic England advice in the justification.

archaeological or historic landscape issues that the HER and county archaeological advisors will be able to identify. We recommend that local authority conservation expertise should be used in relation to all heritage assets. Historic England promotes a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The historic environment should therefore play a critical role in sustainable development at the heart of all spatial planning work, as reflected within the National Planning Policy Framework (NPPF). Please note that Historic England have recently published advice notes. They may be of relevance to the update of the Local Plan. Specifically, Historic Environment Good Practice Advice Note 1: The Historic Environment in Local Plans and Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets is of particular relevance to you and provides additional information. These can be accessed via the following link:

[https://www.historicengland.org.uk/advice/planning\[planning-system/](https://www.historicengland.org.uk/advice/planning[planning-system/)

Historic England has also recently published a document relating to site allocations in Local Plans - this covers all types of allocation and sets out a site selection methodology in relation to heritage assets. We consider this may be of particular use to you, and the document can be downloaded from:  
<http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans> .

Sustainability Appraisal. In relation to all sites, and in particular those where further assessment or concerns

have been raised, we would recommend that you are guided by the advice of your Conservation specialists and the County Archaeological Advisors.

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ID1: 880 comment\_author: Historic England

## comment content:

The policy is strongly supported. Registered Parks and Gardens are not included within the introductory paragraph; their inclusion would strengthen the protection of heritage assets.

In order to further strengthen the policy the words "In exceptional circumstances" should be deleted from criteria 4. Including these words may imply that other circumstances would be acceptable.

### D. Enabling Development

If to be included, this section should comply with the Historic England guidance, "Enabling Development and the Conservation of Significant Places" such as:-

"Enabling development that would secure the future of an heritage asset which would otherwise conflict with national and local planning policies will not be permitted unless:-

1. It will not materially harm the heritage values of a heritage asset or its setting;
2. It avoids detrimental fragmentation of management of the heritage asset:

3.It will secure the long term future of the place and.

Where applicable. Its continued use for a sympathetic purpose;

4. It is necessary to resolve problems arising from the inherent needs of the heritage asset rather than the circumstances of the present owner or the purchase price paid

5.Sufficient subsidy is not available from any other source

6.It is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the heritage asset. And that its form minimises harm to other public interests

## Officer Comment:

Following later advice from Historic England, owing to correspondence with a different member of the team regarding the SA, the policy and the justification have been rewritten to respond to both sets of advice.

## Officer Recommendation:

The policy and the justification have been rewritten to respond to two sets of advice from Historic England.

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

7.The public benefits of securing the future of the heritage asset through such enabling development decisively outweighs the dis-benefits of breaching other policies within the Local Plan."

Paragraph 7.2.6 Table 8 references the 2013 Heritage at Risk register which is now superceded by the 2015 edition.

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ID1:	881	comment_author: South Lincs Environmental Group	
comment_content:	Officer Comment:	Officer Recommendation:	
<p>The plan d s not deal effectively with issues facing Sutton Bridge. There is no mention of the proposed conservation area which has been in the pipeline for over sixteen years during which time we have lost two historic buildings.</p> <p>Sutton Bridge is the only main town not to have the much requested and needed conservation area, the reason being, we are told, SHDC could not afford the staff to finish off the work they had nearly completed.</p> <p>This new plan will run until 2036 and our group are concerned that Sutton Bridge is again not being listened to. Sutton Bridge is a the gateway to Lincolnshire.</p>	<p>The designation of conservation area is a function retained by South Holland District Council. It is not one for SE Lincolnshire Joint committee, which only has a plan making function. The plan quite properly refers to conservation areas as it will affect how development proceeds in a conservation area.</p>	<p>No change to the approach is required.</p>	

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

ID1:	882	comment_author:	Wash & Sutton Bridge Protection		
comment content:	Re: Sutton Bridge - 1.1.2 states that the Plan should identify those areas of land which must be protected from development perhaps because of their historic or environmental importance. There is much mention of 'conservation areas' and preserving history in the plan but nothing about Sutton Bridge except the odd reference to the bridge itself. When the issue was raised at the SELLP exhibition it was claimed that the intended 'conservation area' for Sutton Bridge was not part of the remit yet it is acknowledged that Holbeach, for example, had a historic centre (3.2.15)	Officer Comment:	The designation of conservation area is a function retained by South Holland District Council. It is not one for SE Lincolnshire Joint committee, which only has a plan making function. The plan quite properly refers to conservation areas as it will affect how development proceeds in a conservation area.	Officer Recommendation:	No change to the approach is required.

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ID1:	883	comment_author:	Long Sutton and District Civic Soci		
comment content:	Re: Sutton Bridge The Society has sought in the past to encourage the establishment of a conservation area in Sutton Bridge, work on which seems to have been shelved by the Council in or around 2006. Since then at least one major building of merit in the town has fallen into ruin and is currently being demolished and others may follow. Whilst conservation areas may not in themselves add significant extra protection to buildings they do focus attention on the place and encourage 'Place Making' which is beneficial in assuring social cohesion and improving the function and appearance of settlements.	Officer Comment:	The designation of conservation area is a function retained by South Holland District Council. It is not one for SE Lincolnshire Joint committee, which only has a plan making function. The plan quite properly refers to conservation areas as it will affect how development proceeds in a conservation area.	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:

884

comment\_author:

Spalding and District Civic Society

comment\_content:

Policy 26 7 & 8 Excellent.

Officer Comment:

Accept although following later advice from Historic England, owing to correspondence with a different member of the team, the policy and the justification have been rewritten to respond to both sets of advice.

Officer Recommendation:

No change to the approach is required.

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ID1:

885

comment\_author:

Lincolnshire County Council

comment\_content:

Public Health Comments  
This policy is important for maintaining community identity.

Officer Comment:

Accept

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: 886 comment\_author: Mike Harrison

comment content:

Most of the archaeology is below ground with very few to be seen in the area. Lincolnshire County Council commissioned a report on the tourism potential of the area and withdrew its funding for Fens tourism due to the lack of attractive volume tourist attractions.

Officer Comment:

The comment is noted.

Officer Recommendation:

No change to the approach is required.

ID1:

887

comment\_author: Waller Planning

comment content:

Part A1, Listed Buildings

This policy fails to reflect the cost/benefit approach advocated by the NPPF, which envisages that there may be instances where proposals which would cause harm to a heritage asset may be made acceptable by wider planning considerations. As drafted, it implies that all proposals that would cause harm will be refused. However, paragraphs 132, 133 and 134 provide the context within which such proposals should be determined; they require a consideration of any benefits against any harm to the significance of the heritage asset, in the context of the importance of the asset. This approach is not properly reflected in Policy 26, and so it is currently unsound, due to being inconsistent with national policy.

However, please note that Ashley King Developments, as a local developer, is committed to doing all that is reasonably possible to preserve and enhance heritage assets in South East Lincolnshire.

Part C, Heritage Assets of Local Interest The proposal to treat non-designated heritage assets, such as buildings which may or may not be locally listed, in the same way as listed buildings is unreasonable and unjustified. The approach advocated by the NPPF, at paragraphs 132 - 134 recognises that the case in favour of the conservation of a heritage asset will depend on its significance. As drafted, this aspect of the policy would effectively preclude development which may bring major benefits, but would result in the loss of a building which is not worthy of designation as a listed building. The approach is not balanced or proportionate, and it is not consistent with national policy. There is also no clear way of defining what a heritage asset of local

Officer Comment:

Following later advice from Historic England, owing to correspondence with a different member of the team regarding the SA, the policy and the justification have been rewritten to respond to both sets of advice.

Officer Recommendation:

The policy and the justification have been rewritten to respond to two sets of advice from Historic England.

interest may be, or when it may reach the status of being deserving of the very high level of protection Policy 26 proposes. As such, this policy is unworkable in its current form.

Part D, Enabling Development The requirement for the benefits brought by enabling development to 'significantly' outweigh dis-benefits is unreasonable. There should be a presumption in favour of preserving historic buildings, and this high policy test is likely to make it difficult for enabling development proposals to come forward. We suggest that a lower, but still stringent policy test would be more appropriate, with wording such as the need for a 'clear benefit'.

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**Post\_title: 7.3 Pollution**

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**ID1:** 888 **comment\_author:** Paul Tame

**comment\_content:**

We like policy 27 but would like the policy to be clearly applicable to new housing and other development which is proposed to be sited near to noisy or smelly farm buildings. This would prevent the possibility of abatement notices being served on existing businesses because of new householders coming to the area and houses being sited in the wrong place. I'd be grateful if this could be looked at.

**Officer Comment:**

The relationship between proposed housing and existing uses, which may cause an unacceptable impact of residential amenity, is considered by point 1 of the Development Management Policy.

**Officer Recommendation:**

No change to the approach is required.

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

ID1:

889

comment\_author: South Holland DC Environmental

comment content:

Whilst the air quality section on Page 80 is designed to apply generally across South Lincolnshire, the emphasis seems to be on the 2 sites in Boston which might confuse. Whilst these do form air quality management areas and reference to these specifically is both right and understandable, there are wider factors that should perhaps be mentioned to avoid anyone thinking that it only applies to these areas:

- With there now being a strong base of scientific evidence that particulates from traffic pollution are a contributor to premature death (29,000 in the UK in 2008, 25,000 of these in England), with Nitrogen Dioxide also strongly linked, there is a strong need to also avoid increasing traffic pollution at other locations that fall below the threshold for a declared AQMA, but which could potentially reach this threshold in the future if unchecked;
- Councils have a duty to ensure that the national air quality objectives are met in their area;
- National air quality objectives will evolve over time to further reduce negative impacts on human health and the environment. With this in mind it is important that we are able to require further assessment by developers and apply conditioning of applications / permissions, with air quality as a material consideration. It may be necessary to agree a threshold for the number of properties being developed, or the scale of non-housing developments, at which point further assessment of air quality impacts by the developer will take effect and the areas where such further assessment will be relevant. This might be one large scale development, or potentially a number of smaller developments where there is the potential for a

Officer Comment:

Accept

Officer Recommendation:

Refer to Land Use Planning & Development Control: Planning for Air Quality sections 5 onwards, in a reworded para 7.3.6 that refers to "Major Applications" or "in AQMA".

negative impact on air quality in a defined location. This might be where there could be impact on a particular street, or combination of streets, where the air quality objective for a particular pollutant either isn't being met, or could fail to be met in the future. Such considerations may vary to reflect changes in the levels of pollutants and the pollutants themselves, as published from time to time as national air quality objectives.

We are at a point where for large scale housing development we need to be asking for an air quality assessment and proposed mitigation offered by the developer such as the installation of electric vehicle charge points, provision of cycle / safe pedestrian routes, bus interchanges, contributions to road improvement schemes, etc, or combinations of these, to ensure we can keep control of air quality in the future.

We understand that a policy needs to exist under the local plan before such measures can be required. Recognition of the 'Land-Use Planning & Development Control: Planning For Air Quality' document would be a great help to all concerned in the planning process in aiding the understanding of air quality issues and the expectations as regards designing out air quality issues, undertaking air quality assessments, assigning significance to air quality impacts and measures that can be put in place to mitigate these impacts.

Section 4 of the document makes reference to the Planning Framework and the impacts on air quality and I'd encourage those developing the Local Plan to refer to this section when considering air quality in the context of the Local Plan revision. I'd ask that serious consideration be given to the inclusion of references to this guidance in the local plan.

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

ID1: 890 comment\_author: John Chapman

## comment content:

Of all the south east Lincolnshire towns Boston has an in depth history of traffic congestion and poor air quality. Air Quality Management Areas have been declared for Boston and whilst this is acknowledged in Section 8 there is a distinct lack of direction for dealing with this issue when compared against the information and Strategy for delivery of the Spalding Western Relief Road.

Policy 31: Delivering a More Sustainable Transport Network fails to deliver a feasible solution to Boston's transport issues and simply relies upon a vague proposal for 'safeguarding a corridor for the Boston Distributor Road, associated junctions and crossing points'. There is no clarity or commitment to any specific route other than reference in 8.1.9 to potential Quadrant developments and there is therefore no clear strategy for delivering any of the critical transport infrastructures, junctions and rail and water crossings necessary for a distributor road.

The Boston Transport Strategy 2006 - 2021 clearly needs to be updated to enable the Local Plan to include a Strategy for delivery of the Boston Distributor Road and thereafter be included within LTP5. Without this level of detail and certainty the Greater Lincolnshire Local Economic Partnership is unlikely to recognise Boston as a priority for allocating future funding.

## Officer Comment:

Owing to the response from SHDC Environmental health Department para 7.3.6 will be rewritten to refer to "Land Use Planning & Development Control: Planning for Air Quality". This will influence air quality for major developments in all settlements in SE Lincolnshire. The Boston Transport Strategy is currently being updated to cover the period upto 2036 and this will assist in the choice of Preferred Housing sites.

## Officer Recommendation:

Refer to Land Use Planning & Development Control: Planning for Air Quality sections 5 onwards, in a reworded para 7.3.6 that refers to "Major Applications" or "in AQMA".

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

ID1: 891 comment\_author: Mr B J Smith

comment\_content:

I am concerned at the discharge, upon start up, from the current Power Station and the lack of monitoring of its impact on the health of this and future generations .

Officer Comment:

The EA monitor stack emissions. SHDC also monitor air quality near to the power station.

Officer Recommendation:

No change to the approach is required.

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ID1: 892 comment\_author: Mrs Alison Blinco

comment\_content:

Long Sutton Los020, Los019, Los009, Los006 Combined areas.

Noise and Nuisance Pollution and Overlooking: Our area of Skelton Drive and neighbouring roads have matured into a quiet and peaceful area consisting mainly of elderly retirees. We feel strongly that this should be preserved by not introducing a dissimilar community into our area, so complying with our present Government's requirement for a 'Cohesive Society'. Following on from recent local developments in Long Sutton, there is great concern that the Council will not pay due regard or respect to privacy or noise and nuisance pollution and may allow our pleasant area to degrade.

Officer Comment:

These sites have not been chosen as a Preferred Housing Site in the July 2016 consultation.

Officer Recommendation:

No change to the approach is required.

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ID1: 893 comment\_author: Natural England

comment content:

We generally welcome this policy but suggest that the protection of soils should be specifically mentioned. Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important soils are protected and used sustainably. The plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. We advise that the Plan policies refer to the Defra Code of practice for the sustainable use of soils on construction sites (<https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>). Whilst we acknowledge that the protection of Best and Most Versatile (BMV) land has been included with the Plan we suggest that specific policy reference should be made. BMV land is Grades 1, 2 and 3a in the Agricultural Land Classification. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services. In the longer term, protection of BMV land may also reduce pressure for intensification of other land.

Officer Comment:

The justification for the policy refers to land and so this comment is covered. However, the wording could be amended to make this point clearer. The land in SE Lincolnshire is all Grade 1, 2 or 3a. As we have to meet our objectively assessed housing needs, employment and retail requirements we will have to allow the development of Best and Most Versatile land. The amount of previously developed land is insufficient to meet our needs. Although it would be best to use grade 3a over grade 2 or grade 1, owing to the need to use land with the best flood risk, this will not always be achievable.

Officer Recommendation:

Amend wording to mention soils. Refer to (<https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>).

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

ID1: 894 comment\_author: Chestnut Homes

comment content:

This policy quite rightly looks to acknowledge the potential impact of pollutants as a result of development proposals. The policy identifies exceptions where it can be clearly demonstrated the wider social economic benefits of the development outweigh the adverse environmental impact. In our experience we believe there may be different interpretations on what is acceptable as an impact from different sectors of the community. There is the danger that this policy could be utilised to frustrate development and we would welcome some recognition that a balanced approach is required in relation to the need for the new development and the effect on existing community.

Officer Comment:

All planning decisions are a balanced decision on the issues raised by the application. The meaning of acceptable will be illustrated by supporting evidence such as contaminated land reports and noise reports, if required. Owing to comments received from Boston Borough and South Holland District Councils air quality assessments will need to be considered for all major applications.

Officer Recommendation:

No change to the approach is required.

ID1: 895 comment\_author: Woodland Trust

comment content:

It is disappointing that in Policy 27 on pollution, there is no recognition of the role which trees can play in removing pollutants from the air. Although South East Lincs is predominantly rural, there are some urban areas such as parts of Boston where air pollution is an identified problem. Planting of street trees near to pollution hot spots, such as road junctions, has been shown to be of great benefit in reducing levels of some of the most dangerous pollutants. See our report on Air Quality and Trees for more information: <http://www.woodlandtrust.org.uk/publications/2012/04/urban-air-quality> .

Officer Comment:

Accept

Officer Recommendation:

Refer to trees in the justification

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

ID1:	896	comment_author:	Spalding and District Civic Society		
comment_content:	Policy 27 Include a reference to visual pollution, linked to wherever in the plan it will be dealt with.	Officer Comment:	Agree	Officer Recommendation:	Include a reference to visual pollution, linked to the Design Policy.

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ID1:	897	comment_author:	Amec Foster Wheeler		
comment_content:	We are supportive of Policy 27 in that development should seek to minimise pollutants to acceptable levels. We also support the principle included in Policy 27 which states that when considering the effects of pollution, the wider social and economic benefits of a development can be weighed against adverse environmental impacts to clearly justify an exemption to the standard preceding policy text. This reflects the weighing of material planning considerations undertaken by a Local Authority when considering applications for development.	Officer Comment:	Accept	Officer Recommendation:	No change to the approach is required.

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ID1:

898

comment\_author:

Campaign to Protect Rural Englan

comment content:

This is generally welcomed. Light pollution is not however given any weight in the Policy. CPRE campaigns nationally to recover the 'dark skies' that were once visible across most of the country but have been progressively lost to light pollution from settlements and industry. Our dark skies in Lincolnshire are worth preserving. We largely take them for granted because most of us live in rural areas and see them every clear night. City and town dwellers are much less fortunate but can escape the built up area to see the sky if they wish to relatively easily in the county. Dark Skies are a tourist attraction for city dwellers that may never have seen them. They are a natural asset to be protected as much as any other. Modern street and building lighting has helped with better reflector design but it needs to be specified in the design briefs for developments and we believe should be recognised in the Plan. Certain farming operations are also significant light pollutants and by bright farm building lights can destroy 'night vision' so masking the sky to observers. All can be better managed by a simple recognition of the problem and incorporation in development policy.

Officer Comment:

Accept

Officer Recommendation:

Refer to Light Pollution in the policy and justification. Where lighting is installed as part of development lighting should be designed to light the required area and prevent light spilling upwards and outwards from the area to be lit.

ID1: 899 comment\_author: Lincolnshire County Council

comment\_content:

Public Health Comments  
There should be no exceptions made for unacceptable impacts on (a) the health and safety of the public. Clarification is requested on the threshold of what is acceptable for (b) the amenities of the area and (c) the natural, historic and built environment.  
How might it be demonstrated that the wider social and economic benefits of a development outweigh the adverse environmental impact?

Officer Comment:

It is not considered possible to be definitive about "acceptable impacts" nor how they might be assessed as each development proposal and site will provide different issues and potential solutions.

Officer Recommendation:

No change to the approach is required.

ID1: 900 comment\_author: Mike Harrison

comment\_content:

The area is one of low pollution - the populations of lichens on house roofs and other buildings are a good indicator. There are, however, some issues around the blowing of silt due to increasing organic matter.

Officer Comment:

Accept.

Officer Recommendation:

No change to the approach is required.

Post\_title: **7.4 Climate Change and Renewable & Low Carbon Energy**

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

ID1: 901 comment\_author: Mrs J Ansell

comment\_content:

I want to thank you for such a clear and open presentation. Despite concern about large energy generating installations being foisted upon us I see that a lot of thought has been put into the plan for the whole area.

Officer Comment:

Accept

Officer Recommendation:

No change to the approach is required.

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ID1: 902 comment\_author: Country Landowners Association

comment\_content:

We consider Policy 28: Renewable Energy to be sensible and pragmatic.

Officer Comment:

Accept

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:

903

comment\_author: Renewable Energy Systems Ltd

comment content:

I am pleased to submit a representation to the Draft South East Lincolnshire Local Plan from RES Limited (RES). RES is one of the oldest and largest developers of onshore wind projects in the UK. A British company, we have been involved in delivering renewable energy projects since the inception of wind and solar generation, and have successfully delivered a significant number of high quality projects across the UK and Ireland and throughout the world. RES remains at the forefront of the renewable energy sector in the UK, and we are committed to meeting the UK's decarbonisation and energy requirements through projects that are both subsidy free and that sit within local plan site allocations and secure local support. National planning policy directs local planning authorities to have a positive strategy to promote energy from renewable and low carbon sources and design their policies to maximise renewable development... (NPPF, Paragraph 97, Bullets 1 and 2). The NPPF's presumption in favour of sustainable development confirms that when making plans, local planning authorities should positively seek opportunities to meet the development needs of their area (NPPF, Paragraph 14, Bullet 1). This principle applies to all types of development, including renewable energy infrastructure. The NPPF encourages the use of renewable resources (NPPF, Paragraph 17, Bullet 6) and explains that local planning authorities should: adopt proactive strategies to mitigate and adapt to climate change (Paragraph ) recognise the responsibility on all communities to contribute to energy generation from renewable or low

Officer Comment:

SE Lincolnshire contains four wind farms: Bicker, Deeping St Nicholas, Gedney Marsh and Tydd St Mary, which have a total of 34 turbines.

Three further schemes in South Holland have either been refused, Sutton St Edmund or non determined, West Pinchbeck and Holbeach Marsh. West Pinchbeck had unresolved ecology issues and Holbeach Marsh has unresolved MOD issues. There is also an existing wind farm outside SE Lincolnshire at Wryde Croft with a further 13 turbines.

These existing schemes are separated by at least 10km and by as much as 25km in some cases, which minimises the cumulative impact they have on the landscape. It is a landscape with turbines rather than a landscape of turbines.

The two areas that have been suggested as potential areas for on shore wind farms have each contained the applications that have been formally non determined.

The northern site contains Holbeach Marsh which lies beside the existing Gedney Marsh windfarm and is currently awaiting MOD issues to be resolved. It is also near to the Wash which has national and international wildlife designations and therefore it is unclear if this is a suitable site.

The southern site contains the West Pinchbeck site which was non determined and was affected by ecology issues. Any proposed new site further east would have the potential to impact on the setting of the Crowland

Officer Recommendation:

No change to the approach is required.

carbon sources (Paragraph 97)

have a positive strategy to promote energy from renewable and local carbon sources (Paragraph 97, Bullet 1)

design their policies to maximise renewable and low carbon energy development (Paragraph 97, Bullet 1)

consider identifying suitable areas for renewable and low carbon energy sources (Paragraph 97, Bullet 3)

As you will be aware the DCLG announcement of 18th June 2015 represents a substantial change in planning policy, placing increased importance on the identification of sites suitable for onshore wind energy. As yet, however, there has been little guidance advising how developers, Local Planning authorities and local communities should respond to the new planning guidance, both to ensure that the positive planning approach at the heart of the NPPF (specifically para 97) is retained and also to ensure that the UK planning system remains fair and balanced.

The Written Ministerial Statement states that:

"When determining planning applications for wind energy development involving one or more wind turbines, local planning authorities should only grant planning permission if:

- the development site is in an area identified as suitable for wind energy development in a local or neighbourhood plan; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing."

RES strongly recommend that the Councils use the opportunity of the Local Plan to develop a map to identify areas suitable for wind energy development to meet the requirements of the NPPF and WMS.

Abbey Scheduled Ancient Monument and would also have a cumulative impact with the Wryde Croft Site. It is therefore unclear if this is a suitable site.

Paragraph 97 of the NPPF says local authorities should consider identifying suitable areas for renewable and low carbon energy sources. This covers more than wind energy. However, the NPPG says suitable areas for wind energy development will need to be allocated clearly in a Local or neighbourhood plan. It does not say this is required for other forms of renewable energy development.

In addition to the wind farms referred to above SE Lincolnshire has seven solar farms: Crowland, Frampton, Kirton, Leverton, Long Sutton, Sutterton/Wigtoft, Sutton St James. There is also one unimplemented scheme at Sutton St James. There are also a number of Anaerobic Digestion plants on farms or farm related businesses.

It is not considered the two sites suggested for wind farms are suitable owing to unresolved issues with recent planning applications. In addition owing to the changes to financial support for wind and solar it is considered that the policy approach is suitable since the agricultural land is best and most versatile and should be protected for crops.

Although we are not currently promoting any specific sites within South East Lincolnshire, we believe that there is significant potential to work with the councils and to take a partnership approach to identifying suitable sites for onshore renewable energy projects. We also believe that there is significant support RES could provide to your planning team, given our expertise of onshore wind site selection. RES is happy to provide support to the Council and provide data to inform the identification of suitable areas for wind energy development.

By way of context, RES note that Rotherham Borough Council has recently published their draft Sites & Policies Plan, which identifies areas that are suitable for wind energy development. The approach they have taken is quick and efficient, and heavily reliant on policy criteria. RES supports their approach as an effective method of identifying suitable areas and meeting the requirements of the Written Ministerial Statement. The approach taken by Rotherham Borough Council is simple and uses only two criteria, landscape designations and wind speed. Rotherham Borough Council have focused on excluding landscape designations and divided the remaining area of the Borough by wind speed to determine the scale of potential onshore wind development (either potentially suitable for small and medium wind turbines or potentially suitable all wind turbines).

I have attached a map of a broad area in South Holland with potential for onshore wind. We would be happy to produce more detailed, refined site maps taking into account housing buffers and other constraints, to assist with the identification of sites suitable for onshore

wind.

In addition to provision to a map of areas suitable for onshore wind we recommend a minor amendment to the Renewable Energy policy. We suggest that the phrase no demonstrable harm is amended to use Environmental Impact Assessment terminology. Demonstrable could be a very low level of impact and could be interpreted as de minimis or negligible. We suggest that instead the term no significant impact is used.

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ID1:	904	comment_author:	Mr Roland Pears
comment content:	Officer Comment:	Officer Recommendation:	
I would like to make the following objection to the above proposed planning which will involve our property at the following address. 48 Gedney Road Long Sutton PE12 9JE The request to build 580 new properties in estimation will bring in 1,160 extra motor vehicles, parents and children. The exacerbation of noise, carbon pollution and lack of facilities will be overwhelming for this market town. We suffer badly when the A17 is closed due to serious road collisions, but have to live with that so the emergency services can complete their work.	The response from South Holland DC Environmental Health Department to the Pollution policy raises the issue of requiring air quality assessments for large developments. This will address pollution generally. The improvement of facilities is an issue for the Infrastructure Delivery plan, which accompanies the local plan.  The housing figure for Long Sutton has been slightly reduced to 560 and the proposed site to the rear of this property has not been put forward as a preferred site.	Policies in the Local Plan have been modified.	

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

ID1: 905 comment\_author: Natural England

comment content:

We generally welcome this policy particularly the provision to incorporate measures which promote and enhance green infrastructure and the resilience of ecosystems and biodiversity networks. We are pleased to note the reference to the National Character Areas (NCA) and the local Landscape Character Assessments as set out in paragraph 7.4.5.

Officer Comment:

Accept

Officer Recommendation:

No change to the approach is required.

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ID1:

906

comment\_author: RSPB

comment content:

The RSPB are pleased to see that Policy 28 recognises the role new development can play in helping nature adapt to climate change. Increasing ecosystem resilience and improving the networks linking habitats is to enable species to adapt to the changing climate. The RSPB recommend strengthening the provisions within policy 25 (as per comments on policy 25), and mapping potential areas for new GI on allocation maps (as per comments on Policy 5), to maximise the effectiveness of policy 28.

There are a number of wind farm developments surrounding The Wash SPA. To ensure that further wind farm development does not have an adverse effect on the designated features of the Wash SPA it is essential to understand the potential cumulative effects. The RSPB strongly recommend that a requirement for post construction monitoring is included within the Local Plan. This is likely to be required, under the precautionary principle, to ensure no adverse effect from further wind farm developments near The Wash SPA.

Point 7.4.6 should be amended to include nature. The RSPB would recommend it is reworded to read 'balance has to be struck between providing these large scale schemes and their impact on nature, the landscape, residential and visual amenity and the loss of agricultural land'. This will align with the approach taken in point 12 of policy 28.

Officer Comment:

With national changes to wind farm policy and the subsidy arrangements for on shore wind it is unclear whether more schemes will be delivered. However, adding a requirement for post construction monitoring is reasonable, should schemes with planning permission be delivered, or an unforeseen change in policy occurs. Also amending para 7.4.6 as suggested is reasonable.

Officer Recommendation:

Amend the policy to include post construction monitoring and change para 7.4.6 to include balance has to be struck between providing these large scale schemes and their impact on nature, the landscape, residential and visual amenity and the loss of agricultural land'

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

ID1: 907 comment\_author: Historic England

comment\_content:

There is concern that there is no reference to heritage assets within the proposed policy. Renewable energy developments can impact significantly upon heritage assets. Policy 28 would be improved and strengthened by the addition of a further criteria after 13) such as:- '14. Heritage Assets'

Officer Comment:

Accept

Officer Recommendation:

add '14. Heritage Assets'

ID1: 908 comment\_author: Clowes Developments North Wes

comment\_content:

Clowes Developments (North West) Ltd is concerned that the Policy as currently drafted is too prescriptive and goes beyond the current Building Regulations for England. Insisting that new developments use locally sourced and recycled materials and requiring developers to reduce emissions from buildings to zero, or as low as possible does not take account of cost or availability of such materials. This reference should be removed or moderated by 'encouraging' developments to use such materials.

Officer Comment:

Using locally sourced or recycled materials reduces the embodied energy in a building because materials do not have to be transported long distances or extends the use of the embodied energy of the manufactured product. It is acknowledged that recycled materials are less available (usually bricks or tiles) and that there is not a local manufacturer of many building products, possibly with the exception of windows. It is also acknowledged that viability is a local issue and as a result of national changes to building regulations, reference to this can be removed.

Officer Recommendation:

The criteria have been reworded and ordered and include "employing a high quality design"

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

ID1: 909 comment\_author: Chestnut Homes

comment content:

We would question the need for a specific policy relating to climate change as part of this Local Plan, with the exception of policies relating to renewable energy, which do require a more locally based perspective to guide this often emotive issue. The initial two sections of the policy referenced 1-8 can be adequately dealt with by other policies in the Local Plan such as the Development Management Policy 3 and the Housing Allocations, or by National Guidance eg NPPF and building regulations. It is important that additional burdens on new developments are not imposed by this policy as this could affect viability.

Officer Comment:

It is acknowledged that some aspects of this policy might be covered by other policies. However they may become unweildly. The advantage of having a separate policy is that it draws the topic together and encourages developers to think more holistically about the issue and its resolution. Owing to another response on this policy criterion 6 has been amended to remove reference to carbon emissions and now reads:- "using high quality design that uses locally sourced and recycled materials, where available and suitable".

Officer Recommendation:

No change to the approach is required.

ID1: 910 comment\_author: Woodland Trust

comment content:

Policy 28 talks about the benefits of increased biodiversity in helping to enable climate change adaptation but does not mention the specific role which trees and woods can play in this ; eg through shading and evaporative cooling from tree canopies. You could also mention woodfuel as an important source of clean renewable energy, with the important caveat that the wood used should be sourced from trees and woods which have been managed in an environmentally sustainable way and preferably certified as such by a reputable certification body (eg Forest Stewardship Council).

Officer Comment:

Accept

Officer Recommendation:

Refer to trees in the justification, or policy 25, which it refers to.

ID1:

911

comment\_author:

Long Sutton and District Civic Soci

comment content:

The Civic Society's area of interest has seen a large number of sustainable energy developments in recent years including solar parks in Long Sutton and Sutton St James, two wind farms, a number of individual medium and large wind turbines and the energy distribution infrastructure for the Skegness offshore wind farm. Local people have complained to us about the impacts of some of these developments including visual intrusion, sun bounce from solar panels, the loss of grade 1 and 2 farming land and an erosion in the appearance and attractiveness of the countryside. Wind turbines in particular are a discordant feature in the countryside and are irrevocably changing its character and appearance and any new applications we consider should be resisted.

Officer Comment:

The policy seeks to address these issues.

Officer Recommendation:

The criteria have been reworded and ordered and include sunlight reflection.

ID1: 912 comment\_author: Studio 11 Architecture Ltd

comment content:

This policy needs to clarify that the sequential and exception tests and measures to reduce the effects of flooding are only relevant where the site is within flood zones 2 & 3.

Whilst it is accepted that SuDS may be desirable it is not always practical in all cases and the policy should be more flexible to allow for analysis on a site by site basis. Rainwater harvesting and greywater recycling measures are extremely costly and are not accepted by Lead Flood Authorities as acceptable mitigation measures. This policy would add cost and reduce the viability and delivery of developments.

Items 4-7 within this policy need to be consistent with national policy. The Government has made it clear through the Housing Standards Review 2014 that they consider that the construction and energy efficiency of buildings should be regulated by the Building Regulations. They have also abolished the Code for Sustainable Homes and zero carbon housing is no longer required due to its associated costs. Evidence needs to be provided which demonstrates local need, impacts on viability and why there is a need within this policy to exceed Building Regulations.

Officer Comment:

The NPPG says " Nor should it normally be necessary to apply the Sequential Test to development proposals in Flood Zone 1 (land with a low probability of flooding from rivers or the sea), unless the Strategic Flood Risk Assessment for the area, or other more recent information, indicates there may be flooding issues now or in the future (for example, through the impact of climate change)." As such criteria 1 will not be changed because the SFRA or more recent information may indicate there are flooding issues.

Rainwater harvesting and grey water recycling were not intended as flood risk mitigation measures. They are being suggested as measures that collectively will reduce the amount of fresh clean water to be supplied by Anglian Water to benefit the water supply catchment. This can be stressed at certain times through the demands of the human population and ecosystem requirements. SuDS are becoming more common and have the twin benefit of reducing surface water flood risk and allow the slower percolation of water into the soil to recharge ground water locally to the benefit of the local ecosystem.

The Deregulation Act 2015 takes away the ability of Local Planning authorities to require dwellings to be built to a standard beyond that required by the Building Regulations.

Officer Recommendation:

The criteria and justification have been reworded and ordered and include updated wording owing to the Deregulation Act 2015.

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

ID1: 913 comment\_author: Lincolnshire Wildlife Trust

comment content:

The Lincolnshire Wildlife Trust supports this policy to achieve a reduction in carbon emissions and address the impacts of climate change. We particularly welcome points 3 and 8 relating to enhancing green infrastructure and providing a net gain in biodiversity. It should be noted that habitats can store carbon and therefore the creation of habitats, for example fenland and wet grassland in the South Lincolnshire Fenlands area, can be used for carbon off-setting. The Lincolnshire Wildlife Trust also welcomes the requirement for proposals to protect water resources and incorporate Sustainable Drainage Systems (SuDS). Certain elements of SuDS such as ponds can benefit both people and biodiversity by reducing the risk of flooding and providing a wildlife resource contributing to green infrastructure, providing they are designed with this in mind at the outset. We have some concerns regarding the last sentence of the policy in relation to renewable energy. It is not clear what is intended by including the wording 'where appropriate, the proposal complies with Policy 25'. We would argue that all developments should be complying with Policy 25 otherwise they are not in line with the development plan and should therefore be refused permission. We would recommend that this wording is therefore removed from the policy.

Officer Comment:

Accept.

Officer Recommendation:

The policy is redrafted in response to this and other comments received.

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

ID1:

914

comment\_author:

Spalding and District Civic Society

comment content:

9&12 Should be pretty effective in restricting on-shore wind farms and extensive solar farms on prime agricultural land.

Officer Comment:

Accept

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: 915 comment\_author: Amec Foster Wheeler

## comment content:

We support the overarching notion that Policy 28 supports development of renewable and low carbon sources of energy which contribute to achieving sustainable development and meeting the challenge of climate change. This reflects the principles outlined in the NPPF. However, we request that the following text is re-worded to make specific reference to infrastructure which is necessary to support renewable energy projects. Our suggested wording is as follows:- Proposals for the development of renewable and low carbon sources of energy, including supporting infrastructure for renewable energy projects, will be supported and considered in the context of contributing to the achievement of sustainable development and meeting the challenge of climate change.

We also note that Policy 28 places a number of obligations / requirements on developers, including the use of high-quality design (using locally sourced materials) and improving the energy performance of existing buildings. Whilst we support the notion that the criteria outlined in Policy 28 should be considered by developers in the first instance when formulating development proposals, we consider that greater flexibility should be incorporated into the wording of Policy 28 which reflects the appropriateness, viability and feasibility of such obligations / requirements to certain types of development and the impact this could have on scheme viability.

## Officer Comment:

Accept

## Officer Recommendation:

In response to this comment and another the policy includes: "Proposals by a local community for the development of renewable and low carbon sources of energy, in scale with their community's requirements, including supporting infrastructure for renewable energy projects, will be supported and considered in the context of contributing to the achievement of sustainable development and meeting the challenge of climate change and against criteria 6-12."

The criteria have been reworded and ordered and include "high quality design"

ID1: 916 comment\_author: Lincolnshire County Council

## comment content:

### Strategic Planning Comments

LCC support the policy but would suggest that it should contain some reference to supporting community led schemes. The National Planning Policy Framework (NPPF) states local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable and low carbon sources, and support community led initiatives for renewable and low carbon energy sources.

DCLG planning guidance also suggests local authorities may wish to establish policies which give positive weight to renewable and low carbon energy initiatives, which have clear evidence of local community involvement and leadership.

In addition, Environmental Scrutiny Committee considered a report on community energy last year (15 March 2015) and resolved: "That the Committee supports the inclusion of appropriate policies in the Central Lincolnshire, East Lindsey, South East Lincolnshire and South Kesteven Local Plans and endorses further discussion on the most appropriate ways in which to support Community Energy Schemes."

### Countryside Services

It is generally pleasing that reference is made to the protection and enhancement of the public rights of way network particularly in Policies 28 to 30.

### Public Health Comments

This is a good policy which LCC Public Health strongly supports.

## Officer Comment:

This change to include community led schemes is acceptable and is supported by the NPPF.

National planning policy has changed to prevent on shore wind unless the area is shown in a local or neighbourhood plan in a suitable location. Two areas have been suggested by a windfarm developer in South Holland. Both areas have had planning applications submitted within them that have unresolved planning issues, such that one application has been formally "Non Determined" and the other is awaiting a decision in relation to MOD concerns. In addition one area would also have the potential to affect the setting of Crowland Abbey and have an in combination affect with a windfarm at Wryde Croft. It is therefore, not considered that these two suggested areas are suitable for allocation. Since areas in other parts of South Holland and Boston Borough have not been suggested it is assumed they are not suitable for other reasons. However, a local community could through a neighbourhood plan allocate a site for a wind turbine, or a small group of wind turbines, if they wished.

A ministerial written statement in march 2015 supported solar schemes on previously developed land and not on best and most versatile agricultural land without "most compelling evidence". There is little previously developed land in South East Lincolnshire and so schemes are likely to be on best and most versatile land. It is considered that a community supported scheme could be "most compelling evidence". Since this statement there have been reductions to solar subsidies.

## Officer Recommendation:

In response to this comment and another the policy includes: "Proposals by a local community for the development of renewable and low carbon sources of energy, in scale with their community's requirements, including supporting infrastructure for renewable energy projects, will be supported and considered in the context of contributing to the achievement of sustainable development and meeting the challenge of climate change and against criteria 6-12."

Neighbourhood plans or Neighbourhood Development Orders are referred to in the justification.

Other renewable energy schemes, suitable for this area, would be biomass employing: Anaerobic Digestion; of which there are many farm based schemes in South East Lincolnshire; or combustion. A combined heat and power scheme would be another option.

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ID1:

917

comment\_author:

Campaign to Protect Rural Englan

comment content:

This is generally welcomed With regard to solar parks, roof or small scale ground solar panel installations sun bounce can sometimes cause problems for residential occupiers, motorists or pedestrians. Consideration should be given with detailed policy for the appropriate sun path analysis to be undertaken to determine areas at risk and require the developer to take appropriate precautions to ameliorate any impacts. Should the Greater Lincolnshire devolved authority get the go-ahead, one of its stated aims is to become 'the renewable energy and offshore wind capital of Europe' An expansion of onshore wind turbine development in the Plan area would be seen as unwelcome. The area is already accommodating much of the onshore power distribution infrastructure for the Lincolnshire offshore fields and has a significant density of land based turbines.

CPRE is not opposed to renewal energy solutions per se but is concerned about the impact to visual amenity in the countryside. As has been previously stated in our response to 3.2.3 (spatial strategy) wind turbines present a discordant feature in the flat landscape across the Plan Area. We have proposed an amendment to the wording of Policy 2 which we believe would give better control of potentially unwelcome development in the countryside.

Officer Comment:

The policy seeks to address these issues.

Officer Recommendation:

The criteria have been reworded and ordered and include sunlight reflection.

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

ID1: 918 comment\_author: Mike Harrison

comment content:

The area is now dominated by gas fired power stations and wind farms. The large open skies are now blighted by these structures and more dominant power stations are to be built.

Officer Comment:

The policy requires skyline to be considered. It will not affect decisions that have already been made.

Officer Recommendation:

No change to the approach is required.

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ID1:

919

comment\_author: Waller Planning

comment content:

Part 1 of the Policy 28 should clarify that it is only necessary to apply the sequential and exceptions tests in certain circumstances, as set out in national policy and guidance. As drafted, it appears to require these tests to be applied to all development proposals.

Part 2 SuDS may be desirable, but they may not be practical in all cases. Similarly, rainwater harvesting and grey water recycling are good things to aim for, but the cost and practicality of incorporating them may be reasons for not using them. For instance, where viability would be adversely affected, reducing the amount of affordable housing that could be provided, the Councils may decide to take a pragmatic approach to reduce development costs. We suggest that part 2 of the policy should be amended to state that SuDS are 'normally required, where practical'.

Part 4 Predicted global temperature rises are below 2 Celsius, and so are not likely to have a serious effect on buildings in South East Lincolnshire, other than with regard to sea levels. If this aspect of the policy is intended to require measures to be incorporated in new buildings, evidence should be provided to show why standard building regulations are not sufficient in this case. As drafted, this policy appears to be likely to increase the cost of building, reduce the viability of development and increase carbon emissions through building, without any demonstrable benefit.

Part 6 Policies which require new development to go beyond national standards, such as building regulations, must be justified by evidence showing why there is a particular local need to do so. Otherwise, they are contrary to paragraph 95 of the NPPF and the NPPG1. We are unaware of any evidence which justifies the

Officer Comment:

The NPPG says "Nor should it normally be necessary to apply the Sequential Test to development proposals in Flood Zone 1 (land with a low probability of flooding from rivers or the sea), unless the Strategic Flood Risk Assessment for the area, or other more recent information, indicates there may be flooding issues now or in the future (for example, through the impact of climate change)." As such criteria 1 will not be changed because the SFRA or more recent information may indicate there are flooding issues.

Rainwater harvesting and grey water recycling are being suggested as measures that collectively will reduce the amount of fresh clean water to be supplied by Anglian Water to benefit the water supply catchment. This can be stressed at certain times through the demands of the human population and ecosystem requirements. SuDS have the twin benefit of reducing surface water flood risk and allow the slower percolation of water into the soil to recharge ground water locally to the benefit of the local ecosystem. This is an issue considered in the HRA. However, amending the comments re SuDS is reasonable and current practice.

The policy asks "to demonstrate that the consequences of current climate change has been addressed" and so it is quite reasonable to look at the issues and discuss the consequences upon viability in your choice.

Criterion 4. The building regulations may well be appropriate to our climatic conditions, but self builders may wish to go beyond them to adapt their dwelling. There are issues of water use, design, orientation, shading, which help buildings operate effectively to provide suitable warmth and coolth . However, this section will be rewritten to clarify this concern.

Officer Recommendation:

The criteria have been reworded and ordered and some of the previous text is now in the justification.

approach proposed in Part 6 of Policy 28. Zero carbon housing is likely to be expensive to build, and may well not be viable in South East Lincolnshire. Policy 28 appears to have been drafted without reference to recent changes in building regulations, and the fact that the Code for Sustainable Homes has been abandoned by the Government. We note that the NPPG requires such an approach to be considered in light of the need to achieve viable development. In light of our comments in relation to Policy 15, it may be that the Council will wish to reconsider this matter, in the interest of delivering a higher level of affordable housing.

Part 8 This part of the policy is unnecessary, as it simply repeats matters covered by Policy 25.

Owing to another response on this policy criterion 6 has been amended to remove reference to carbon emissions and now reads:- "using high quality design". The consideration of Climate Change requires a multi faceted approach. Criterion 8 (now 7) is appropriate since it links the consideration of Climate Change adaption to the natural environment. The natural Environment can provide shade and improvements to it can improve shading and ecosystem services and resilience. We need to stop thinking about buildings and then fitting in natural environment and to start to think of it as a whole.

## Post\_title: 7.5 Design of New Development

ID1: 920

comment\_author: Pedals - Spalding's Cycle Action Gr

comment\_content:

Policy 29 We support item 4 of Policy 29. We believe that a distinction should be made between storage of bicycles (where bicycles are to be kept for long periods of time eg overnight or for several hours of the working day) and parking of bicycles for shorter periods of time. This is explained in more detail in "Think of Cycling: checklist for planners, applicants and agents" endorsed by officers of SHDC and LCC in 2012 and published on SHDC's website. We suggest that item 5 should be improved by inserting "storage and/or" before the phrase "parking of bicycles".

Officer Comment:

Accept

Officer Recommendation:

Insert "storage and/or" before the phrase "parking of bicycles"

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

ID1: 921 comment\_author: Environment Agency

## comment content:

Policy 29: The Design of New Development policy only requires applicants to demonstrate how they have considered the 16 points listed. There are no specific criteria for acceptability, so this will be subjective " the plan could lead to either schemes of low quality being deemed acceptable or many planning appeals as there are no specific expectations defined.

Your approach does not appear to accord with the NPPF which states at paragraph 154 'Local Plans should set out the opportunities for development and clear policies on what will and will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan' (emphasis added)

Policy 29/3.3.8 refers to ensuring that development would not be wasteful in its use of energy or in its depletion of natural resources and refers to Policy 29 for 'more detailed guidance with regard to waste minimisation, utilising renewable energy, reducing water consumption and the sustainable use of existing materials on site'. However, Policy 29 does not appear to provide any more detail to guide expectations. For Example, in respect of reducing water consumption it just asks that developments do this 'by using water efficiency and rainwater and grey water storage measures'.

This policy needs to be improved by the inclusion of detailed expectations, for example specifying expected water consumption figures that homes will be expected to adhere to (as required by para 154 of the NPPF). We would encourage you to set ambitious water consumption targets, for example 110 litres per person

## Officer Comment:

Para 59 of the NPPF also says that "design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally." To this end the design policy lists issues that should be considered by the designer of the scheme. Not all will be relevant to all cases.

Building Regulations consumption is 125 litres per person per day with an option of 110 litres if conditioned by a planning permission. The Environment Agency "Water Stressed Areas - final classification July 2013 classifies Anglian Water as Serious but separately the Environment Agency indicate that Boston and South Holland are not classed as water stressed. On this basis there is no justification to require 110 litres per person, although it would be possible for developers to voluntarily achieve this target for marketing purposes

Policy 29,12 and para 7.5.10 Accept

## Officer Recommendation:

Include "where they are relevant to the proposal"

Refer to flood resistant, as well as flood resilient design.

Amend the justification to separate flood risk and polluting activities.

per day for new homes. Anglian Water's Water Resource Management Plan (WRMP) sets out a plan to maintain the balance between supply and demand over the next 25 years, as well as deal with the longer term challenge of population increase, climate change and growing environmental needs. It is important that Local Authorities and developers liaise with Anglian Water regarding the demands arising from new developments. We would encourage you to enter into dialogue with Anglian Water regarding an appropriate target for water usage.

Policy 29, 12. We request that when referring to the need to provide flood risk mitigation, flood resistant, as well as flood resilient design is referenced.

7.5.10 the wording of this paragraph seems to have been taken from the Environment Agency's representation to the previous local plan consultation (Response to Q70 in our letter of 28 June 2013).

However, a reference to owing to flood risk seems to have been added, together with one to flood control measures. Our representation referred only to the protection of groundwater from potentially polluting activities and this additional reference to flood risk does not appear appropriate in this paragraph.

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ID1:

922

comment\_author: Mrs Alison Blinco

comment content:

Long Sutton Los020, Los019, Los009, Los006 Combined areas.

Officer Comment:

These sites have not been chosen as a Preferred Housing Site in the July 2016 consultation.

Officer Recommendation:

No change to the approach is required.

## Drainage and flooding

The land at the rear of our property is adjoining the possible new combined development sites. It is our understanding that this whole area has a high water table, exhibited by surface water ponding, and recent planning consent for the new Cemetery has highlighted a need for the surface to be significantly raised. If this is found to be necessary on any new development, my fear is that this will increase the likelihood of further ponding and also flooding in adjacent settled areas, roads and properties. Taking this into account, can the Council give assurance that appropriate drainage schemes will be included in any planning consent, be made available for public inspection, and if the sites were to be developed separately by several contractors, then there would be cooperation between all developers to ensure a satisfactory outcome. What steps will the Council take to oversee and ensure a high level of scrutiny of coordination between developers, and, adherence to Terms of Consent in its entirety without modification?

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

ID1: 923 comment\_author: Miss Sara Ibbitt

comment\_content:

Fra024: Middlegate Road - With the exception of 1 property, all the rest are bungalows, and so houses built along the back would certainly have a negative impact on light and visibility.  
With these issues I am strongly opposed to any building works in the Fra024 area of proposed housing.

Officer Comment:

This site has not been chosen as a Preferred Housing Site in the July 2016 consultation.

Officer Recommendation:

No change to the approach is required.

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ID1: 924 comment\_author: Natural England

comment\_content:

We welcome this policy particularly 3 and 14 regarding landscape character and enhancing biodiversity and green infrastructure.

Officer Comment:

Accept

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: 925 comment\_author: Natural England

comment\_content:

We would suggest that landscape character is given a greater emphasis in the Plan. The local authority may want to consider a separate policy on this issue which would aim to protect and enhance local landscape character and to follow the advice set out in the Boston and South Holland Landscape Character Assessments.

Officer Comment:

It is considered this is not required as the issue is covered by this policy and the Development Management policy.

Officer Recommendation:

No change to the approach is required.

ID1: 926 comment\_author: RSPB

comment\_content:

Exeter City Councils residential design guide supplementary planning document (SPD) provides a best practice example of incorporating biodiversity in the design of new developments (available at: <http://exeter.gov.uk/planning-services/planningpolicy/supplementary-planning-documents/residential-design-guidespd/>). This SPD has been widely endorsed and the RSPB strongly recommend that similar provisions are laid out in the Local Plan, or through the creation of a similar SPD.

Officer Comment:

Policy 25 Natural Environment is to be amended in response to the RSPB's comments, which help to meet these concerns.

The Local Development Scheme does not include the preparation of SPD.

Officer Recommendation:

No change to the approach is required.

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

ID1: 927 comment\_author: Historic England

comment\_content:

Reference to the historic environment within criteria 1 is welcomed. Reference to heritage assets is strongly welcomed within criteria 1.

Officer Comment:

Accept

Officer Recommendation:

No change to the approach is required.

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ID1: 928 comment\_author: Clowes Developments North Wes

comment\_content:

Clowes Developments (North West) Ltd is generally supportive of the Policy which seeks to encourage high quality development, however the Policy does need to be amended to acknowledge that financial viability and availability of materials could justify a departure.

Officer Comment:

Accept

Officer Recommendation:

The introductory paragraph to the policy includes "Development proposals will demonstrate how the following issues, where they are relevant to the proposal and viable will be secured: "

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

ID1: 929 comment\_author: Mrs L Pears

## comment content:

Long Sutton's identity as a quiet, rural market town will be tarnished if all of these proposals move forward. The historical character of the town is an important aspect of the communities well-being we like the way it looks! I believe a wider concern of the community is not just the quantity of houses being proposed but also how they will look. There is no indication to suggest that these properties will preserve the character of the town. - In addition to the towns historical character the proposals put forward give no indication about the environmental impacts or opportunities. Long Sutton's more recent identity has be largely defined by a strong focus on environmental strategies namely the preservation the local flora and fauna, small developments that adhere to eco-friendly policies (which I believe work with the quiet, rural identity), and an aggressive recycling scheme. The proposals jeopardise this identity because no supporting framework has been presented and there is also no information that looks at how these proposed properties will have an impact on localised flooding. The question here is if these proposals are inevitable what are the policies that will be placed on the developer to ensure that he or she provides properties that adhere to this identity? Will there be a requirement to meet the criteria set-out in BREEAM for example?

## Officer Comment:

Development will be considered against other policies in the Local Plan.

Breeam is a non residential design code which goes beyond the building's fabric standard to include whole life issues. A residential version evolved into the "Code for Sustainable Homes", but this has now ceased owing to Government deciding to merge it into the Building Regulations.

The Deregulation Act 2015 takes away the ability of Local Planning authorities to require dwellings to be built to a standard beyond that required by the Building Regulations. BRE have launched the Home Quality Mark for developers but this is voluntary.

## Officer Recommendation:

No change to the approach is required.

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

ID1: 930 comment\_author: Chestnut Homes

comment content:

We fully support a locally based approach to design and the emphasis on high quality new development that is the driving force for this policy. We would however query whether this policy needs to be simplified. Not all developments will need to address all 16 listed criteria depending on the scale, type and location of development proposed. Omission of the 16 listed criteria would still achieve a policy where design is considered a key component.

Officer Comment:

Para 59 of the NPPF says that "design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally." To this end the design policy lists issues that should be considered by the designer of the scheme. Not all will be relevant to all cases.

Officer Recommendation:

Include "where they are relevant to the proposal"

ID1:

932

comment\_author: Studio 11 Architecture Ltd

comment content:

There seems to be a lot of repetition within this policy of other policies within the Plan.

Item 5 needs clarification as to when provisions are expected.

Item 7 seems unworkable as not all buildings could or should be adaptable for a variety of uses.

Item 9 is unnecessary and evidence of need should be provided to demonstrate local need and why compliance with Building Regulations is not sufficient.

Item 13 is repetition of other policies and the need to use locally sourced materials is unworkable given the amount of development required to deliver the Plan.

Paragraph 7.5.7 is too prescriptive and more flexibility should be provided allowing a number of solutions to policy compliance.

Officer Comment:

Para 59 of the NPPF says that "design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally." To this end the design policy lists issues that should be considered by the designer of the scheme. Not all will be relevant to all cases.

5. Since every dwelling produces refuse providing space for the storage of that waste before collection is a requirement for all dwellings. This is most necessary in flatted schemes a long with spaces to store cycles, as residents may own one, in stead of a vehicle. Car parking is required by the parking standards.

7. The policy will be rewritten.

9. The building regulations relate to the standards required for elements in the fabric and services of a building. The orientation of the building can make the best use of sunlight and shade, passive heating and cooling, as well as active systems, such as solar panels. This is down to the skill of the architect.

13. The policy will be rewritten.

Para7.5.7 is the explanation of part of the policy and seeks to raise the architects awareness of issues and solutions that good design can achieve. The policy has been amended to include "where they are relevant to the proposal" as it is accepted that not all of the criteria

Officer Recommendation:

The policy will be amended will include "where they are relevant to the proposal"

are relevant in all cases. They are issues to be considered when designing a scheme.

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ID1: 933 comment\_author: Lincolnshire Wildlife Trust

comment\_content: Officer Comment: Officer Recommendation:

The Lincolnshire Wildlife Trust welcomes the inclusion of point 14 within this policy, to ensure that enhancement of biodiversity is considered within landscaping of new development.

Accept

No change to the approach is required.

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

ID1:

934

comment\_author: Spalding and District Civic Society

comment content:

Policy 29 In essence, we find this an admirable policy, being particularly pleased to see the emphasis on creating "distinctive places" and "a sense of place". Also "respecting the density"

Paragraph 1 (end): strengthen by changing "have been taken into account" to "will be secured".

10 Whereas the other instances mentioned can be fairly easily assessed for visual intrusion, the whole question of advertising and other signs needs fuller treatment. The relevant policy in the existing South Holland Local Plan is much more specific "for example, on illuminated fascias in conservation areas, advertising and signs above the ground floor and on gable ends, etc. As suggested on pp.4&5 above, we would urge the need for a separate policy on advertising and signs, which would include the relatively new practice of blanking-out shop windows with vinyl film and often turning them into what amount to advertising hoardings. To have clearly defined limits and requirements would surely be welcome to both planning officers and developers.

7.5.8 Good. If applied rigorously. It should discourage car-led "loops and lollipop" layouts.

Officer Comment:

Support. Strengthening Advertisement policy will be considered

Officer Recommendation:

Paragraph 1 (end): strengthen by changing "have been taken into account" to "will be secured".

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

ID1:	935	comment_author:	Greater Lincolnshire Nature Partn		
comment_content:	The GLNP support point 14 of this policy and the recognition of the importance of biodiversity and green infrastructure in new development.	Officer Comment:	Accept	Officer Recommendation:	No change to the approach is required.

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ID1:	936	comment_author:	Amec Foster Wheeler		
comment_content:	<p>We support the approach to the design of new development outlined in Policy 29, in that new developments will ensure high quality, inclusive design and demonstrate a holistic approach to design quality. However, we consider that viability should be specifically referenced in this policy. Paragraph 173 of the NPPF states that 'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.'<sup>2</sup> This includes the costs of design standards. We therefore consider that Policy 29 should be amended to refer to viability to ensure that the policy is flexible and that development is deliverable.</p>	Officer Comment:	<p>Para 59 of the NPPF says that "design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally." To this end the design policy lists issues that should be considered by the designer of the scheme. Not all will be relevant to all cases.</p> <p>The issue re viability is accepted</p>	Officer Recommendation:	Include viability in the policy

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

ID1: 937 comment\_author: Lincolnshire County Council

## comment content:

### Countryside Services Comments

It is generally pleasing that reference is made to the protection and enhancement of the public rights of way network particularly in Polices 28 to 30. LCC would, however, draw attention to the following points: Reference is made to "footpaths" (point 4) This should be altered to either refer specifically to "footways" or more generally to "public rights of ways" dependent on the intended meaning of the point as a whole.

### Public health Comments

What is here is good with a few notable exceptions. Paragraph 7.5.6 references "housing that can meet the changing needs of the occupants over their lifetime" but a specific policy to achieve this seems to be absent from the Plan. Consideration 7 in the policy mentions public spaces being accessible to all. It is important to recognise that this is about more than physical accessibility but should include for example reference to people with dementia (dementia friendly environments) and sight impairments. Special care should be taken in designing undefined multi use spaces where pedestrians, cyclists, public transport and taxis mingle as these can be confusing for certain groups of people such as these. Design should take the principle of encouraging physical activity in line with guidance published on planning for healthy weight environments , supported by the District Councils' Network. This includes within buildings as well as outside spaces.

## Officer Comment:

### Countryside Services Comments

Accept

### Public health Comments

A specific policy is not required as the issue is raised here.

The point re item 7 is accepted and the justification will be amended.

## Officer Recommendation:

### Countryside Services Comments

Change footpaths to Public Rights of Way.

### Public health Comments

The text has been updated to include "Such facilities should be accessible to all, including those with disabilities, older people and those with pushchairs, as well as other users with more specific needs, such as those with dementia or the visually impaired. Care should also be taken in designing undefined multi-use spaces where pedestrians, cyclists, public transport and taxis mingle as these can also be confusing for such groups."

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

ID1: 938 comment\_author: Anglian Water Services Ltd

comment content:

Reference is made to the inclusion of water efficiency measures. Consideration should be given to whether it is appropriate to adopt the optional higher standard for water efficiency as outlined in Ministerial Statement on building standards.

Officer Comment:

Building Regulations consumption is 125 litres per person per day with an option of 110 litres if conditioned by a planning permission. The Environment Agency "Water Stressed Areas - final classification July 2013 classifies Anglian Water as Serious but separately the Environment Agency indicate that Boston and South Holland are not classed as water stressed. On this basis there is no justification to require 110 litres per person, although it would be possible for developers to voluntarily achieve this target for marketing purposes

Officer Recommendation:

No change to the approach is required.

ID1: 939 comment\_author: Waller Planning

comment content:

This Policy contains a lot of repetition of other policies, which appears unnecessary, and contrary to national guidance. It would be helpful if this policy could be simplified, to improve its clarity, and reduce the potential for confusion with the requirements of other policies.

Part 7

We presume that the Councils do not intend all buildings to have to be designed so that they are adaptable to a variety of uses. This is likely to be unworkable in many cases. We suggest that this part of the policy is reconsidered.

Part 13

We suggest that the use of locally sourced building materials should only be required 'where practical', and these words should be incorporated within the Policy. Ashley King Developments, as a local developer, is committed to doing all that is reasonably possible to use locally sourced materials, but this aim needs to be considered in the context of the Council's wider aspirations regarding viable development coming forwards.

Officer Comment:

The policy will be amended.

Officer Recommendation:

The introductory paragraph to the policy includes "Development proposals will demonstrate how the following issues, where they are relevant to the proposal and viable will be secured: "

Adaptable to a variety of uses has been deleted.

Post\_title: **7.6 Promoting Safe, Accessible Open Space, Sport and Recreational Facilities**

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

ID1: 940 comment\_author: James Avery

comment content:

Green Space. Spalding in particular would benefit from additional green space. As planning applications come forward the Plan needs to ensure provision of good quality green space (for Pinchbeck and Spalding), and that it is located in appropriate locations giving easy access to the new residents. Again, it would be useful to see this become a policy within the Plan, rather than leaving it to developers.

Officer Comment:

It is considered that these matters are adequately dealt with in the Local Plan. Where a development will increase the need for sports facilities, recreational open space or other green infrastructure, policy 30 requires the development to support the provision of new facilities or the enhancement of existing facilities. Furthermore, Inset Map No.2/8 identifies a specific area of land to the north of the Vernatt's Drain and west of Spalding Road, Pinchbeck to be provided as 'Proposed Green Infrastructure'.

Officer Recommendation:

No change is required.

ID1: 941 comment\_author: Brian Collins-McDougall

comment content:

The village green should be designated as a recreational open space reflecting its current use.

Officer Comment:

Agreed.

Officer Recommendation:

Identify land to the south of Bridge Hotel, Sutton Bridge as 'recreational open space'.

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

ID1: 942 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.

However, I would like to see special attention being given to open spaces within these developments. It is important that the immediate local authority (Town or Parish Council) be heavily involved in this area.

Officer Comment:

The support is welcomed.

Where a development will increase the need for sports facilities, recreational open space or other green infrastructure, policy 30 requires the development to support the provision of new facilities or the enhancement of existing facilities. Consultation with town or parish councils can be carried out as part of the development management process.

Officer Recommendation:

No change is required.

No change is required.

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ID1: 943 comment\_author: Mrs Dorothy Morrison

comment content:

I am concerned regarding Moulton Park which has been under consideration for some time regarding housing and a play area for the children of the village. Following several meetings in the village it is noted that everyone wishes to retain the area for free use and a special area for a children's playground.

Officer Comment:

It is agreed that Moulton Park is important to the setting and character of Moulton. To ensure that it remains undeveloped, the Local Plan shows the Park as being:

- outside Moulton's Settlement Boundary;
- within Moulton Conservation Area; and
- a Local Wildlife Site.

It is considered that these provisions will ensure that the Park remains undeveloped. The Local Plan cannot, however, ensure public access to the land.

Officer Recommendation:

No change is required.

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

ID1: 944 comment\_author: Mr Reynolds

comment content:

Don033: More housing will put pressure on the secondary school. Let it expand by building new sports hall opposite on the Don033 site so existing sports hall can be redeveloped into classrooms. Advantage of separate hall is that it can be used at night by villagers etc to play badminton etc.

Officer Comment:

The Local Plan's provisions (policies 6 and 30) require developments that increase the need for educational and sports facilities to support the provision of new facilities or the enhancement of existing facilities. Thus, the issues raised by the objector will be addressed at the time of a planning application being submitted for the development of site Don033. However, it would be inappropriate for the Local Plan to seek to impose a specific solution - these would be negotiated as part of the development management process.

Officer Recommendation:

No change is required.

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ID1: 945 comment\_author: Pedals - Spalding's Cycle Action Gr

comment content:

Not only is it important that the facilities covered by Policy 30 facilitate cycling, but also they should be provided with cycle parking. This may be implied in item 2.iv, but to avoid doubt we suggest amending 2.iv: "iv. Facilitate walking, cycling and public transport use, including providing cycle parking; and"

Officer Comment:

It is agreed that cycle parking should be provided at community facilities, but it is considered unnecessary for the change sought by the objector to be made, given that cycle parking is dealt with in detail in policy 32 and Appendix 4 to the Plan.

Officer Recommendation:

No change is required.

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

ID1: 946 comment\_author: Gedney Parish Council

comment content:

Green spaces and a specific children's play area must be incorporated in any housing development. The local parish council must be involved in the planning of open spaces and recreational facilities.

Officer Comment:

Where a development will increase the need for sports facilities, recreational open space or other green infrastructure, policy 30 requires the development to support the provision of new facilities or the enhancement of existing facilities. Consultation with town or parish councils can be carried out as part of the development management process.

Officer Recommendation:

No change is required.

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

ID1:

947

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that although the policy does not include reference to the identification of specific open spaces on the Proposals Map, such a designation is included on the Inset Map. We have requested that this designation is removed.

The policy makes reference to increasing the need for community facilities, including recreational open spaces, sports facilities and other green infrastructure to meet the needs of the current population and new development unless 'where necessary' facilities are provided. An onus is placed on applicants to undertake an assessment which clearly shows that a facility is surplus to requirements and that it does not make an important contribution in amenity, visual or nature conservation terms. The policy, however, fails to define what constitutes an 'existing Community facility'.

The 2012 South East Lincolnshire Joint Strategic Planning Committee's 'Sports Provision and Open Space Assessment' considers open space provision in all communities and makes conclusions about the current level of supply, based on a suggested space standard per 1000 people. This standard is not included in the draft policy and Local Plan, however, and as such there is no clarity regarding the basis on which an assessment of how to assess the community's needs. The clause regarding the redevelopment of existing community facilities should either be amended to include a specific standard which should then be subject to public testing, or should be deleted.

Officer Comment:

The Inset Maps identify land that is currently in use as 'Recreational Open Space' and 'Green Infrastructure' and this is considered to be entirely appropriate.

The policy identifies what constitutes 'community facilities', i.e. "education, childcare, teenage services, emergency services, social care, health care, libraries, museums, other cultural facilities, community halls, sports facilities, recreational open space, or other green infrastructure".

The wording of this part of the policy is identical to that in paragraph 74 of the NPPF.

Officer Recommendation:

No change is required.

No change is required.

No change is required.

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

ID1:

948

comment\_author:

Robert Doughty Consultancy Ltd

comment content:

We note that the policy does not include reference to the identification of specific open spaces on the Proposals Map. We have requested that such notation is removed.

The policy makes reference to increasing the need for community facilities, including recreational open spaces, sports facilities and other green infrastructure, to meet the needs of the current population and new development unless 'where necessary' facilities are provided. An onus is placed on applicants to undertake an assessment which clearly shows that a facility is surplus to requirements and that it does not make an important contribution in amenity, visual or nature conservation terms. The policy, however, fails to define what constitutes an 'existing Community facility'.

The 2012 South East Lincolnshire Joint Strategic Planning Committee's 'Sports Provision and Open Space Assessment' considers open space provision in all communities and makes conclusions about the current level of supply, based on a suggested space standard per 1000 people. This standard is, however, not included in the draft policy and local plan and as such there is no clarity regarding the basis on which an assessment of the community's needs will be undertaken. The clause regarding the redevelopment of existing community facilities should either be amended to include a specific standard which should then be subject to public testing or should be deleted.

The 2012 study does not appear to have taken into account the ownership and management regimes of individual sites. Our client's land is not subject to any

Officer Comment:

The Inset Maps identify land that is currently in use as 'Recreational Open Space' and 'Green Infrastructure' and this is considered to be entirely appropriate.

The policy identifies what constitutes 'community facilities', i.e. "education, childcare, teenage services, emergency services, social care, health care, libraries, museums, other cultural facilities, community halls, sports facilities, recreational open space, or other green infrastructure".

The wording of this part of the policy is identical to that in paragraph 74 of the NPPF.

Noted

Officer Recommendation:

No change is required.

No change is required.

No change is required.

No change is required.

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

formal agreement with the Parish Council and its continued availability to the community is not guaranteed.

<b>ID1:</b>	949	<b>comment_author:</b>	Surfleet Parish Council		
<b>comment_content:</b>	<p>We support the policy to promote safe, accessible open space, sport and recreational facilities. We value the public right of way that allow footpaths to be used for exercise and recreation.</p> <p>The space for recreation in Surfleet, coloured green on map 25 is within the red line of development boundary. This space is a valuable amenity in the village and should be protected as such.</p>	<b>Officer Comment:</b>	<p>The support is welcomed.</p> <p>The Settlement Boundaries Background Paper (January 2016) makes it clear that, as well as enclosing the main built-up area of a village or town, the Settlement Boundary should also enclose "areas of amenity and/or recreational open space". Thus, it is considered appropriate that Glen Park, Surfleet should be shown as being within the Settlement Boundary. This does not, however, put the Park at risk of being redeveloped because policy 30 indicates that it can be redeveloped only if: it is surplus to requirements; it will be replaced; or if the redevelopment is to provide alternative sports or recreational facilities.</p>	<b>Officer Recommendation:</b>	<p>No change is required.</p> <p>No change is required.</p>

ID1: 950 comment\_author: Natural England

comment content:

Natural England supports option b which suggests a policy approach should be followed.

We agree with the Sustainability Appraisal, as highlighted at paragraph 7.6.3, which suggests this policy could be improved by making reference to the important contribution that open space can have in nature conservation and visual terms.

We recommend the use of Accessible Natural Greenspace Standard (ANGSt) as a useful tool that can help ensure adequate provision of accessible natural greenspace. Green space policies should be linked to Green Infrastructure policies. For more information see Accessible Natural Greenspace Standard (ANGSt) ([http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/regions/east\\_of\\_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx](http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/regions/east_of_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx)).

Officer Comment:

The support is welcomed.

These issues are included within the policy - see criterion 1. concerned with the redevelopment or change of use of an existing community facility.

Where a development will increase the need for accessible natural greenspace ('green infrastructure'), the policy requires the development to support the provision of new facilities or the enhancement of existing facilities. Rather than setting out a specific standard (which can become out-of-date) the policy requires provision to be made in accordance with whatever standards the most up-to-date evidence suggests are needed. As at July 2016, the current evidence is set out in the South East Lincolnshire Sports Provision and Open Space Assessment (November 2012), which indicates that 4.5 hectares of natural and semi-natural green space is required for every 1,000 persons.

Officer Recommendation:

No change is required.

No change is required.

No change is required.

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

ID1: 951 comment\_author: Nicholas Revill

comment content:

The Coronation Channel is a tremendous open space and amenity that people enjoy and could be made more use of. It is basically an area of Parkland that could be added to and form part of a leisure area that the Town could be proud of. An open space where a meaningful contribution to the Town could be incorporated. There could be a 'beach' like the one at Rutland Water. Can ing and boat launching, Picnic areas and proper cycle paths giving access to schools and other areas of the Town. Currently it is under used and not recognized for the potential that it could deliver to the People of the Town. It is a wonderful local amenity that is in place, available but underutilised.

Officer Comment:

It is agreed that the Coronation Channel has recreational potential, but any exploitation of that potential would need to take account of the wildlife interest that has led to it being designated as a Local Wildlife Site. Where a development will increase the need for sports facilities, recreational open space or green infrastructure, the policy requires the development to support the provision of new facilities or the enhancement of existing facilities. Thus, it is possible that new development elsewhere in Spalding might make a financial contribution that could be spent on the enhancement of the Coronation Channel's recreational potential. However, no formal proposals exist at present which could be reflected in the Local Plan policies or maps.

Officer Recommendation:

No change is required.

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

ID1: 952 comment\_author: Theatres Trust

## comment content:

The Theatres Trust is pleased proposed policy 30 will recognise, protect and support community and cultural facilities. The importance of planning for culture and cultural facilities is emphasised in the National Planning Policy Framework by being included as a core planning principle (item 17). This is supported by guidance in item 70 of the NPPF which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.

## Recommended changes:

1. For clarity when reading the plan, the name of this policy should be amended to reflect its full purpose, rather than the focus on open space and recreation. We recommend something like: Policy 30: Promoting Safe, Accessible Open Space, Recreation and Community Facilities

2. For clarity, and so that guidelines are clear and consistent, we recommend the accompanying text and the Glossary contain an explanation for the term 'community facilities'. We recommend this succinct all-inclusive description which would obviate the need to provide examples: community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

3. We also recommend strengthening the wording of

## Officer Comment:

The support is welcomed.

It is agreed that the policy's name does not accurately reflect the range of issues it addresses. However, it is considered that it should be titled 'Community, Health and Well-Being'.

The policy already seeks to identify what constitutes 'community facilities', i.e. "education, childcare, teenage services, emergency services, social care, health care, libraries, museums, other cultural facilities, community halls, sports facilities, recreational open space, or other green infrastructure".

It is not agreed that the suggested wording would be superior to that put forward in the Local Plan (which accords very closely with that set out in the National Planning Policy Framework).

## Officer Recommendation:

No change is required.

Rename the policy 'Community, Health and Well-Being'.

No change is required.

No change is required.

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

the policy with the following amendment: The redevelopment or change of use of an existing community facility will be permitted only if: Replacement facilities are provided on site or within the vicinity which meet the need of the local population; or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; and it has been demonstrated that there is no community need for the facility or demand for another community use on site and, in the case of recreational open space, that it does not make an important contribution in amenity, visual or nature conservation terms; or

ID1:	953	comment_author:	Mr Michael Maltby	
comment content:		Officer Comment:		Officer Recommendation:
Re: Boston - I believe that the potential housing development marked Fis001 and Fis017 would, if fully developed, put an increased strain on local facilities. There will be a further decline in public access to rural open space in the Borough of Boston, namely, the footpaths across open fields between Blackthorn Lane, Eastwood Road, Lindis Road and Rochford Tower Lane enjoyed by so many at the moment.		Fis017 has not been taken forward as a Preferred Housing Site. It is not agreed that the development of site Fis001 would curtail public access to the countryside - existing footpath routes across the site would need to be retained within any new residential layout and would continue to give access to the countryside to its east.		No change is required.
It should be noted that the zones marked in green as Recreational Open Space on the map 'Layout_2' is entirely misleading; much of the land has no public right of access - e.g. School playing fields, allotments, and Boston United Football Ground. The Borough is relatively poorly served with recreational green spaces where there is public right of access; this needs to be enhanced, rather than diminished.		The objector is correct that there is no public access to many of the areas of land identified as 'Recreational Open Space'. Nonetheless, all of these sites contribute to the visual amenities of their surroundings and bring nature conservation benefits, and therefore merit protection.		No change is required.

ID1: 954 comment\_author: Chestnut Homes

comment content:

This is a wide ranging policy which appears to be justified at paragraph 7.6.2 as a means of ensuring Health and Well Being issues are summarised in one place, albeit they are mostly covered elsewhere in the Local Plan or NPPF. Again, from a practical perspective, we would question whether the first two sections of the policy can better be dealt with elsewhere in the Local Plan, eg Policy 3 and 6. The final section of the policy relating to existing community facilities is more appropriate as a specific policy for the Local Plan and could be retained.

Officer Comment:

The justification to policy 30 acknowledges that it tackles four separate topics, and paragraph 7.6.1 acknowledges that it was an option to rely upon the provisions of the NPPF rather than including a policy at all. It is accepted that some of the policy's content either is already dealt with or could be dealt with as part of other policies, but it is nonetheless considered to be useful for the Plan to contain a single policy that seeks to draw together issues of particular relevance to community, health and well-being given the importance that the NPPF accords to such topics.

Officer Recommendation:

No change is required.

ID1:

955

comment\_author: Woodland Trust

comment content:

Turning to policy 30, we support the recognition in this policy of the need for people to have access to green infrastructure, including natural greenspace and woodland, close to where they live, and the health and well being benefits which this can provide in terms of encouraging healthy exercise and contact with nature etc. There is strong evidence that giving people ready access to woodland in particular can provide a particularly wide range of social, economic and environmental benefits to local communities, including shading of buildings to reduce urban temperatures during summer, improvement of water quality etc.

Recognising this, Woodland Trust has developed an Access to Woodland Standard which aspires that everyone should have access to a small wood within easy walking distance (defined as 500m) from their home. Further information on this standard can be found on our website at <http://www.woodlandtrust.org.uk/publications/2015/02/space-for-people/> . We would be happy to advise on how this can be incorporated into a local plan and used to derive targets for woodland creation.

Officer Comment:

The support is welcomed.

Where a development will increase the need for green infrastructure (such as woodland), the policy requires the development to support the provision of new facilities or the enhancement of existing facilities. Rather than setting out a specific standard (which can become out-of-date) the policy requires provision to be made in accordance with whatever standards the most up-to-date evidence suggests are needed.

Officer Recommendation:

No change is required.

No change is required.

ID1: 956 comment\_author: Lincolnshire Wildlife Trust

comment content:

Natural greenspace is an important facility for communities to allow space for adults and children to relax and enjoy nature, which can help improve the community's health and well-being. The Trust supports this policy which should ensure the protection of existing areas of natural greenspace and the provision of new areas as part of development proposals.

Sufficient natural greenspace should be accessible to residents to meet Natural England's Accessible Natural Greenspace Standards. Greenspace should be implemented at an early phasing of the development and funding arrangements should be in place to ensure long term management of the greenspace. Early development of habitats is important to allow space for species to move into when development starts.

Officer Comment:

The support is welcomed.

Where a development will increase the need for accessible natural greenspace ('green infrastructure'), the policy requires the development to support the provision of new facilities or the enhancement of existing facilities. Rather than setting out a specific standard (which can become out-of-date) the policy requires provision to be made in accordance with whatever standards the most up-to-date evidence suggests are needed. As at July 2016, the current evidence is set out in the South East Lincolnshire Sports Provision and Open Space Assessment (November 2012), which indicates that 4.5 hectares of natural and semi-natural green space is required for every 1,000 persons.

Officer Recommendation:

No change is required.

No change is required.

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

ID1:

957

comment\_author: Spalding and District Civic Society

comment content:

First section, 1 Good. Meanwhile the government is doing its best to ensure that many rights of way are lost if they are not registered (by whom? the public? hard-pressed local authorities?) on a definitive map by a fast-approaching deadline!

Second section. With regard to the potential redevelopment or loss of existing recreational green space, the policy as a whole needs to be strengthened. Within the last four or five years Spalding has seen the threatened loss of the following recreational green spaces from its already seriously inadequate provision:- the Castle Playing Field, the Halley Stewart Playing Field, the Chiltern Drive Playing Field, the Grammar School's West Field, and now the Severn Road and Queen's Road Playing Fields. (Except for the Grammar School field, all the other threats and intentions have come from within SHDC itself!)

Second section, 2. After "suitable" insert "nearby". (Or, if preferred, recast the provision so that "nearby" refers specifically to "recreational open space"

The justification needs to flag up the issues raised in our opening general comments on this chapter.

7.6.8 First sentence does not make sense. It is grammatically incomplete, something evidently having been missed out.

7.6.8 Second sentence: replace "or" by "and". Surely crucial.

Officer Comment:

The Countryside & Rights of Way Act 2000 introduces the extinguishment of all public rights of way that were in existence before 1949 if they are not recorded on (or that there is an extant application for addition to) the Definitive Map & Statement (DMS) of public rights of way by 2026. However, this does not impact upon policy 30's provisions, which are considered to be appropriate.

The criteria concerning the redevelopment or change of use of community facilities (including recreational open space) are generally considered to be robust, and to accord closely with those set out in the NPPF.

Agreed.

It is assumed that this objection refers to the comments made in representation 860. It is not agreed that these issues should be included within the justification to policy 30.

The word "and" should be deleted.

Agreed. Replace the word "or" with "and/or".

Agreed. Add the word "nearby" after "elsewhere" in paragraph 7.6.9.

Officer Recommendation:

No change is required.

No change is required.

Reword the second criterion concerned with redevelopment or change of use of existing community facilities to read "... Will be replaced by equivalent or better provision (in terms of quantity and quality) in a suitable nearby location".

No change is required.

Delete the word "and" from the first sentence of paragraph 7.6.8.

Replace "or" in paragraph 7.6.8 with "and/or".

Add the word "nearby" after "elsewhere" in paragraph 7.6.9.

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7.6.9 After "recreational use" insert " nearby".

ID1:	958	comment_author:	Amec Foster Wheeler		
comment_content:	We support the wording included in Policy 30 which acknowledges that the protection and enhancement of public rights of way should only be required where this is both possible and appropriate.	Officer Comment:	The support is welcomed.	Officer Recommendation:	No change is required.

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

ID1: 959 comment\_author: Lincolnshire County Council

comment content:

Countryside Services comments  
It is generally pleasing that reference is made to the protection and enhancement of the public rights of way network particularly in Polices 28 to 30.

Public Health Comments Policy 30 is of particular relevance to people's health and wellbeing and the points are well-made in the Justification and opening paragraph to the policy. It is pleasing to see reference to the Joint Strategic Needs Assessment and Joint Health and Wellbeing Strategy.

However, this wider intention is not reflected in the policy's title.

It would help the policy to still have the link to NPPF mentioned. For example 'Paragraph 69 of the NPPF states that "Planning policies and decisions, in turn, should aim to achieve places which promote healthy communities".

It might be useful to expand on 2 (ii) to encourage health eating and local food growing through reference to safeguarding and enhancing the role of allotments, orchards, gardens and community growing spaces.

Recreational open space and green infrastructure is mentioned but in little detail. Could this aspect of the policy be expanded to cover issues such as location, distance from housing, equipment (children's play equipment and outdoor gyms), facilities and design to encourage use?

Officer Comment:

The support is welcomed.

The support is welcomed.

It is agreed that the policy's name does not accurately reflect the range of issues it addresses, and that it should be titled "Community, Health and Well-Being".

It is considered unnecessary for the policy itself to refer to the provisions of the NPPF.

Allotments, public orchards and gardens, and community growing spaces are covered within the policy's definition of 'community facilities' (i.e. They are 'recreational open space' or 'other green infrastructure' and are already covered by the policy and specifically identified on the Inset Maps).

It is considered inappropriate to address such detailed issues in the policy or its justification. Such detail would be more appropriately dealt with in supplementary policy.

Although watercourses and the coast are undoubtedly important local recreational resources, they are not 'community facilities' that need protection against development in the way that open spaces do. Nor are they 'community facilities' of the type that the policy might seek additional provision.

The support is welcomed.

It is considered that the policy's existing reference to

Officer Recommendation:

No change is required.

No change is required.

Rename the policy 'Community, Health and Well-Being'.

No change is required.

Add a new paragraph, after paragraph 7.6.7 as follows - "Applicants must consider the potential health impacts of their development at the earliest possible stage of drawing up their proposals. If significant adverse impacts are identified, applicants must (as part of their planning application) show how these impacts will be mitigated."

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Blue infrastructure (rivers and coast) is particularly relevant in this area and could perhaps be mentioned as well.

LCC welcomes the importance placed on venues to support community engagement and social interaction.

Shared use (7) could be expanded to specifically reference integration with public estate, for example school facilities and community hubs.

It is noted that the Justification includes creating healthy living environments, specifically adaptability, etc., at 7.6.7 but this is only picked up in part in Policies 29 and 30 and those on Quality Housing.

Health Impact Assessment LCC

Public Health feels that the mechanism to evaluate whether a development proposal meets Policy 30 (2) or not is missing. We would like to see the inclusion of a requirement to prepare a fit for purpose Health Impact Assessment (HIA). This would need an unambiguous statement for applicants, the public and other stakeholders so that the HIA is commensurate with the size of the development. However, the HIA should be seen as integrated to the development management process rather than setting up separate processes. As an example Bristol City Council's policy offers a clearly stated approach to Health Impact Assessment. Further examples and would welcome dialogue on the size and content of HIAs proportional to levels of development. This could be along the lines of a healthy planning checklist linked to other policies within the Local Plan (for proportionally small developments only), a rapid health impact assessment or a full HIA including wider public participation. Examples of this can found in work

"shared use with other services/facilities" satisfactorily encompasses potential integration with the public estate.

It is considered that the Plan's various references to 'adaptability' adequately deal with this issue.

Agreed. However, because a requirement for an HIA would be essentially an administrative matter, rather than itself a criterion against which a planning application would be judged, it is considered that this should be introduced in the justification only.

from the Healthy Urban Development Unit (HUDU) and in guidance developed by Ben Cave Associates for South Cambridgeshire. LCC Public Health would be willing to support the development of this policy and its implementation. It is important that HIA is undertaken at the master plan stage with developers needing to demonstrate how the conclusions of the HIA have been taken into account in the design of the scheme eventually put forward for full consent.

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