

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

Post_title: Revised Policy 12: Distribution of New Housing

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| ID1: | 541 | comment_author: | Longstaffs | |
| comment_content: | Land at Gedney Hill. We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Gedney Hill, to a level of 120, for the plan period 2011- 2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its range of services and facilities, which need supporting by new housing for households and families. | Officer Comment: | The support is welcomed. | Officer Recommendation: It is consider that the Local Plan should continue to seek to identify housing allocations of 120 dwellings between April 2011 and 31st March 2036. |
| ID1: | 542 | comment_author: | Longstaffs | |
| comment_content: | Land at Pode Hole. We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Spalding, to a level of 5,880, for the plan period 2011- 2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the town with its range of services and facilities, which need supporting by new housing for households and families. | Officer Comment: | The support for an increase in the Spalding housing requirement is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the figure has now been reduced to 5,255 dwellings. | Officer Recommendation: The revised housing requirement for Spalding is 5,255 dwellings. |

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

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| ID1: | 543 | comment_author: | Longstaffs | |
| comment_content: | Land at Market Way. We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Spalding, to a level of 5,880, for the plan period 2011- 2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the town with its range of services and facilities, which need supporting by new housing for households and families. | Officer Comment: | The support for an increase in the Spalding housing requirement is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the figure has now been reduced to 5,255 dwellings. | Officer Recommendation: The revised housing requirement for Spalding is 5,255 dwellings. |
| ID1: | 544 | comment_author: | Longstaffs | |
| comment_content: | Land at Pinchbeck Road. Ⓜ We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Spalding, to a level of 5,880, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the town with its range of services and facilities, which need supporting by new housing for households and families. | Officer Comment: | The support for an increase in the Spalding housing requirement is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the figure has now been reduced to 5,255 dwellings. | Officer Recommendation: The revised housing requirement for Spalding is 5,255 dwellings. |

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

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| ID1: | 545 | comment_author: | Longstaffs | |
| comment_content: | | Officer Comment: | | Officer Recommendation: |
| We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Spalding, to a level of 5,880, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the town with its range of services and facilities, which need supporting by new housing for households and families. | | The support for an increase in the Spalding housing requirement is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the figure has now been reduced to 5,255 dwellings. | | The revised housing requirement for Spalding is 5,255 dwellings. |

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|--|-----|--|------------|--|
| ID1: | 546 | comment_author: | Longstaffs | |
| comment_content: | | Officer Comment: | | Officer Recommendation: |
| We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Spalding, to a level of 5,880, for the plan period 2011- 2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the town with its range of services and facilities, which need supporting by new housing for households and families. | | The support for an increase in the Spalding housing requirement is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the figure has now been reduced to 5,255 dwellings. | | The revised housing requirement for Spalding is 5,255 dwellings. |

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

ID1: 547 comment_author: Longstaffs

comment_content:

We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Spalding, to a level of 5,880, for the plan period 2011- 2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the town with its range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

The support for an increase in the Spalding housing requirement is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the figure has now been reduced to 5,255 dwellings.

Officer Recommendation:

The revised housing requirement for Spalding is 5,255 dwellings.

ID1: 548 comment_author: Longstaffs

comment_content:

Sur008
We consider the amendment proposed to Policy 12, which provides to increase the allocation of new houses for the village, to a level of 180, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

The support is welcomed.

Officer Recommendation:

Given that no significant challenge has been made to Surfleet's housing requirement, it is considered that the Local Plan should continue to seek to identify housing allocations in Surfleet to provide for 180 dwellings between 1st April 2011 and 31st March 2036.

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

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| ID1: | 549 | comment_author: | Longstaffs |
| comment_content: | Officer Comment: | Officer Recommendation: | |
| Land at Surfleet. [2] We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Surfleet, to a level of 180, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village of this category type, with its good range of services and facilities. | The support is welcomed. | Given that no significant challenge has been made to Surfleet's housing requirement, it is considered that the Local Plan should continue to seek to identify housing allocations in Surfleet to provide for 180 dwellings between 1st April 2011 and 31st March 2036. | |

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| ID1: | 550 | comment_author: | Longstaffs |
| comment_content: | Officer Comment: | Officer Recommendation: | |
| Land at Crowland [2] We consider the amendment proposed to Policy 12 , which provides for an allocation of 500 new houses for Crowland in the plan period 2011-2036, is a positive proposal and will provide for the higher and more satisfactory level of growth for the settlement than the previous allocation proposed in January 2016. | Support for the increase in housing numbers in Crowland is welcome. | No change required. | |

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

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| ID1: | 551 | comment_author: | Longstaffs |
| comment_content: | Officer Comment: | Officer Recommendation: | |
| Land at Quadring We consider the amendment proposed to Policy 12 , which provides for an allocation of 130 new houses for Quadring in the plan period 2011-2036, is a positive proposal and will provide for the higher and more satisfactory level of growth for the village than the previous allocation proposed in January 2016. | The support for Quadring's proposed housing requirement of 130 dwellings is welcome. | It is considered that the Local Plan should continue to identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036. | |

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| ID1: | 552 | comment_author: | Longstaffs |
| comment_content: | Officer Comment: | Officer Recommendation: | |
| Land at Gosberton. We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Gosberton, to a level of 270, for the plan period 2011- 2036, is a positive proposal, as a higher allocation will provide for the greater and more satisfactory level of growth for the village of this category, with its very good range of services and facilities. | The support is welcomed. | Owing to no challenge being made to Gosberton's housing requirements it is consider that the Local Plan should continue to seek to identify housing allocations of 270 dwellings between April 2011 and 31st March 2036. | |

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

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| ID1: | 553 | comment_author: | Longstaffs | |
| comment_content: | Land at Quadring We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Quadring, to a level of 130, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its range of services and facilities. | Officer Comment: | The support for Quadring's proposed housing requirement of 130 dwellings is welcome. | Officer Recommendation: It is considered that the Local Plan should continue to identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036. |
| ID1: | 554 | comment_author: | Longstaffs | |
| comment_content: | Land at Spalding Common We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Spalding, to a level of 5,880, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the town, with its very good range of services and facilities. | Officer Comment: | The support for an increase in the Spalding housing requirement is noted. However, following a full review of the distribution of housing across South Holland District which has resulted in a reduction in Spalding's housing requirement, the figure has now been reduced to 5,255 dwellings. | Officer Recommendation: The revised housing requirement for Spalding is 5,255 dwellings. |

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

ID1: 555 comment_author: D Brown Building

comment_content:

Comments on Wha029 for paragraphs numbered:

2.1 why set it at 150 gedney hill is 110 !! whaplode 150 down to 80 - less existing permissions 68 its bigger than gedney hill.

2.2 Clearly says 150 is minimum and should provide for a figure in excess of this. Also mentions good level local services which Gedney hill d s not have .

2.3 why 80 for whaplode when gedney hill is 110!!!!

This is a massive reduction based on item 1 identified requirements.

Officer Comment:

Wha029 has received planning permission for 33 dwellings since the last consultation, subject to a S106 obligation being signed for affordable housing and an education contribution. As a result it is considered the housing total should rise to 130.

Officer Recommendation:

Win to these comments it is considered that a change is made to Whaplode's housing requirements such that the Local Plan should seek to identify housing allocations in Whaplode to provide for 130 dwellings between April 2011 and 31st March 2036.

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

ID1:

556

comment_author: Savills

comment_content:

In line with Revised Policy 2: Spatial Strategy, new housing allocations will be required in the settlements proposed to accommodate future development (e.g. Sub-regional Centres and Main Service Centres etc.) to meet the identified housing need and demand across South East Lincolnshire. We fully support Sutton Bridge accommodating future development to help meet this need.

Since the last public consultation earlier this year, there has been a slight increase in the housing requirement proposed at Sutton Bridge (from 180 to 210 dwellings). Whilst we appreciate that the scale of housing growth proposed for Sutton Bridge took account of issues such as the population of the parish, the local rate of housing growth and the local availability of land at lower risk of flooding, the slight increase in housing growth at Sutton Bridge to 210 dwellings will help deliver the infrastructure necessary to support viable, sustainable development over the plan period. We therefore fully support this increase / change. The increase provides a better distribution of housing to those settlements which are identified to accommodate new development.

The housing distribution confirms that new housing allocations will be identified in Sutton Bridge (in accordance with the Policies Map) to meet the identified housing need of 210 units. We fully support the need to allocate sites in the Main Service Centre to accommodate future housing development.

We note that the suggested housing numbers are inclusive of extant planning permissions (22 units) and dwellings built (21 units) since April 2011. As such, there is a need to allocate land to accommodate at

Officer Comment:

Support for the increased housing figure, its location and the evidence base upon which the figure is based is welcome. The potential for 210 dwellings to support new infrastructure over the plan period is also acknowledged. The housing figures are a minimum requirement, rather than a maximum target; this approach will help ensure that there is sufficient flexibility over the plan period to accommodate development to meet South East Lincolnshire's housing needs. The scale of housing growth proposed for Sutton Bridge took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; the availability of employment land, and the local availability of land at lower risk of flooding. The level of housing growth proposed for Sutton Bridge stemmed largely from the availability of land with lower flood hazard in and around that settlement and the sustainability credentials of the settlement. Therefore it is considered that the provision of at least 210 dwellings will adequately meet local needs over the plan period. The housing need and the location of dwellings to support that need beyond the plan period, is a matter to be determined by the next Local Plan.

Officer Recommendation:

No change required.

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

least 167 new dwellings to meet the overall need of 210 dwellings.

It is important to note, however, that whilst we support the housing figure proposed, it should not be viewed as a cap / maximum housing figure. Sutton Bridge is a Main Service Centre where a higher amount of residential development could be accommodated to meet the housing need and demand of the area during and beyond the plan period. Furthermore by acknowledging that the housing figure of an additional 167 dwellings is not a cap it provided flexibility within the policies of the Local Plan to ensure it is in accordance with the National Planning Policy Framework which seeks to boost significantly the supply of housing and promotes the presumption in favour of sustainable development.

We therefore support Revised Policy 12: Distribution of New Housing, particularly the increase of housing provision at Sutton Bridge from 180 to 210 dwellings during the Plan period.

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| ID1: | 557 | comment_author: | Roslyn Deeming |
| comment_content: | Officer Comment: | | Officer Recommendation: |
| Natural England notes the comments that have been received on the previous version of the Local Plan and the changes that have been made to revised policies 2 (Spatial Strategy) and 12 (Distribution of New Housing). | The comment is noted. | | No change to the approach is required. |

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

ID1: 558 comment_author: Longstaffs

comment_content:

We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Pinchbeck, to a level of 240, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its very good range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

Support for the increased housing requirement is welcome

Officer Recommendation:

No change required.

ID1: 559 comment_author: Longstaffs

comment_content:

We do consider the amendment proposed to Policy 12 , which provides to decrease the allocation of new houses for Whaplode, to a level of 80, for the plan period 2011-2036, is a negative proposal. We understand the driver for the proposed reduction is that there were too many large sites put forward which were potentially suitable, and it was preferred to reduce the allocation than have to increase it dramatically.

Officer Comment:

The comment is noted.

Officer Recommendation:

Owingo planning permission being granted for 33 dwellings on Wha029 it is considered that a change is made to Whaplode's housing requirements such that the Local Plan should seek to identify housing allocations in Whaplode to provide for 130 dwellings between April 2011 and 31st March 2036.

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

ID1: 560 comment_author: Longstaffs

comment_content:

We do consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Gosberton, to a level of 270 for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its very good range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

The support is welcomed

Officer Recommendation:

Due to no challenge being made to Gosberton's housing requirements it is considered that the Local Plan should continue to seek to identify housing allocations of 270 dwellings between April 2011 and 31st March 2036.

ID1: 561 comment_author: Longstaffs

comment_content:

We do consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Pinchbeck, to a level of 240, for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its very good range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

Support for the increased housing requirement is welcome

Officer Recommendation:

No change required.

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

ID1:

562

comment_author:

Mr Tom Collins (Fisher German)

comment_content:

Donington.

We welcome the increase to 400 dwellings now proposed for the settlement across the plan period, and the clarification provided as to the residual requirement.

Officer Comment:

Support for the increased housing requirement is welcome, as is the approach taken to the residual requirement.

Officer Recommendation:

No change required.

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

ID1:

563

comment_author:

Mr Nick Grace (Grace Machin Plan

comment content:

Bicker:

The LPA have identified that 50 dwellings should be allocated for development in this Local Plan to 2036. With a residual requirement of 49 dwellings by the LPA's own admission the 'preferred' housing sites in this consultation exercise will only deliver 38 dwellings. This identifies a shortfall of 11 dwellings. The logic of the settlement boundary being able to deliver a further 6 units through windfall sites is considered to be wholly inconsistent with National Planning Policy. We consider that the Planning Authority must identify sites alone which will meet the MINIMUM allocation of houses in Bicker. We consider in light of the Local Authorities lack of 5 year supply the level of housing in Bicker should be 49 new dwellings plus 20% which would equate to 59 new housing. On the basis that the allocations currently account for just 38 new homes by allocating site BicOO4 for up to 27 new homes this would ensure that an appropriate level of housing in Bicker is delivered over the next 20 years.

Officer Comment:

Firstly, the consultee is incorrect in their assertion that the Plan's housing provisions for Bicker result in an 11 dwelling shortfall. The trajectory at the end of the 'Housing Paper – Bicker (July 2016)' identifies that the three Preferred Housing Sites together with three other developable SHLAA sites are assumed to deliver 47 dwellings (3 short of the 'target'). Secondly, the identification of housing sites is not an 'exact science', and it is not agreed that a very modest (i.e. 6%) under-provision in a given settlement would compromise the Local Plan's strategy, nor conflict with national planning policy – the Plan's overall housing provisions comfortably meet the objectively assessed housing needs. Furthermore, the Plan's assumptions on site capacities are conservative (assuming 20/hectare) and, in practice, it is likely that the Plan's provisions for Bicker will deliver at least 50 dwellings, given that densities are likely to exceed this assumption. Lastly, it is not agreed that national guidance requires the addition of a 20% buffer.

Officer Recommendation:

It is not considered that the comment made by the consultee justifies a change to Bicker's housing requirements, and consequently it is considered that the Local Plan should continue to seek to identify housing allocations in Bicker to provide for 50 dwellings between 1st April 2011 and 31st March 2036.

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

ID1: 564 comment_author: Longstaffs

comment_content:

We do consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Pinchbeck, to a level of 240, for the plan period 20112036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its very good range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

Support for the increased housing requirement is welcome

Officer Recommendation:

No change required.

ID1: 565 comment_author: Longstaffs

comment_content:

We consider the amendment proposed to Policy 12 , which provides to decrease the allocation of new houses for Moulton Chapel to a level of 130 for the plan period 2011-2036, is a disappointing proposal, as a higher allocation will provide for the greater and more satisfactory level of growth for the village with its good range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

The housing figure was reduced from 150 to 130 for the July consultation following the consideration of the potential housing sites that were subject to consultation in January 2016. Moulton was also reduced through the same procedure, although by more. Moulton has a higher Sustainability of Settlements score than Moulton Chapel and so reducing the figure for Moulton Chapel could be justified. However, after considering the impact of the two Preferred Sites for Development and the fact that Moulton Chapel is sequentially preferable to other settlements on the grounds of flood risk it is considered the housing figure should not change.

Officer Recommendation:

It is not considered that the comments made by the consultees justify a change to Moulton Chapel's housing requirements, and consequently it is considered that the Local Plan should continue to seek to identify housing allocations in Moulton Chapel to provide for 130 dwellings between 1st April 2011 and 31st March 2036.

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

ID1: 566 comment_author: Longstaffs

comment content:

We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Fleet Hargate, to a level of 150 for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its very good range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

Owing to site issues relating to access and impact on the Conservation Area and Listed Buildings the 150 dwelling allocation cannot be met and thereby the figure should be reduced to 70.

Officer Recommendation:

Reduce the housing allocation in Fleet Hargate from 150 to 70 dwellings.

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

ID1: 567 comment_author: Barton Willmore

comment content:

Policy Context

2.1 The National Planning Policy Framework (NPPF) directs local authorities to boost significantly the supply of housing and to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47). For plan making purposes, local planning authorities are required to prepare a Strategic Housing Market Area assessment that identifies the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.

2.2 The Planning Practice Guidance (PPG) (March, 2014) notes that the assessment of housing need should be an objective assessment based on facts and unbiased evidence to which constraints should not be applied (2a-004). The PPG confirms that the household projections (CLG 2011-based interim) provide the starting point estimate of overall housing need. CLG projections are trend based and may require adjustment to reflect factors such as unmet or suppressed need which were not captured in past trends. Three discrete tests are used to establish whether an adjustment is required; adjusting for demographic evidence, adjusting for likely change in job numbers and adjusting for market signals.

2.3 The South East Lincolnshire Plan Area consists of two Housing Market Areas (HMA), namely Boston Borough and the Peterborough Sub-Region and this includes South Holland for the plan period from 2011-

Officer Comment:

Support for the increased housing requirement is welcome

Officer Recommendation:

No change required.

2036. Boston Borough conducted a Strategic Housing Market Assessment (SHMA) in July 2015 and concluded that the Objectively Assessed Need (OAN) for housing is 302 homes per annum (7,550 total for the plan period). Peterborough Sub-Region also conducted a SHMA in October 2015 and concluded that the OAN is 430 dwellings per annum (10,750 for the plan period). Both SHMA figures conclude a total of 18,300 dwellings required throughout the plan period to meet the OAN.

2.4 Policy 11: Meeting Objectively Assessed Housing Needs (Paragraph 5.1.4) of the South East Lincolnshire Local Plan Draft for Public Consultation (including sites options for development) January 2016 states that provision will be made for a net increase of at least 18,250 dwellings for South East Lincolnshire with South Holland accommodating 10,750 and Boston Borough accommodating 7,500.

2.5 Section 5.1 of The South East Lincolnshire Draft Local Plan confirmed to meet the objectively assessed housing needs as set out in the Strategic Housing Market Assessments for Boston Borough and South Holland. However, the proposed housing provision was less than the combined SHMA figures as released in The South East Lincolnshire Draft Local Plan January 2016.

2.6 Policy 12: Distribution of New Housing of the South East Lincolnshire Local Plan 2011-2036 Draft for Public Consultation (January 2016) identified the total number of housing that is required to be delivered across the plan period is 11,620 of which 5,880 of which is for the Spalding Sub-Regional Centre. Crowland was identified as a Main Service Centre at the Draft Local Plan stage was considered to accommodate an additional 380 dwellings throughout the plan period.

2.7 Policy 12 has subsequently been revised as a result of the Draft Local Plan Consultation (January 2016) and the housing figures have been adjusted for settlement's throughout South Holland reflecting an array of further considerations including local amenity, physical and community infrastructure and consultation responses from the Highway Authority, flood risk and a sustainability appraisal. The total number of housing that is proposed has been increased to 11,780 and Crowland now has a revised housing figure of 500 dwellings throughout the plan period (an increase of 120 dwellings from the January 2016 Draft Public Consultation).

2.8 We support the revised housing allocation for Crowland and concur that Crowland is a suitable location to accommodate a significant amount of residential development to enhance the sustainability of the Main Service Centre. In light of this, Crowland's residual residential requirements have been increased as detailed below:

Draft for Public Consultation: Requirement 380 -
Commitments 114 = Residual 266

Preferred Sites for Development: Requirement 500 -
Commitments 193 = Residual 307

2.9 We support the recommendation of additional housing to be allocated within Crowland and support that this recommendation will enable a better form of development to support a viable, sustainable development over the plan period.

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

ID1:

568

comment_author:

Rollinson Planning Consultancy

comment_content:

Swineshead's Place in the Spatial Strategy and its Housing Requirements

Critically in our view, Swineshead is largely unconstrained by flood risk issues. The Swineshead Housing Paper notes that it is the only sizeable settlement in Boston Borough where significant areas of land at low risk or no risk of flooding are available. Given that flood risk is a serious constraint to development across the majority of the plan area, it is considered absolutely essential that full advantage is taken of Swineshead's lack of flood risk.

The (not insignificant) flood risk issues elsewhere in the Plan area must cast some serious doubt that all of the proposed allocations in the other settlements will actually be delivered. For the overall housing requirements to be met the allocations and the Plan need to be robust and must seek to ensure that, as far as reasonably possibly, sufficient deliverable sites are allocated.

Furthermore, the NPPF seeks to boost significantly the supply of new housing and to ensure choice and competition in the market for land. As proposed the proposed allocations, along with the completions to date, would, in any case, only deliver slightly more than the minimum four hundred new homes currently required. The current plan is reliant on every one of the preferred sites being developed to meet the currently identified minimum need.

Given the above, it is considered that the housing

Officer Comment:

It is not agreed that flood risk will prevent the delivery of residential allocations in settlements within Boston Borough where flood hazard is more severe than Swineshead – the Whole Plan Viability Assessment demonstrates that flood mitigation costs will not threaten viability, and the SHLAA demonstrates that land-owners intend to release their sites in a timely manner. It is not agreed that the housing requirement for the village should be increased by 100+ dwellings - 400 is considered to be the appropriate number, taking account of: the findings of the South East Lincolnshire Assessment of Settlements and their Sustainability Credentials (June 2015); the population of the parish; the local rate of housing growth between 1976 and 2011; and the local availability of land at lower risk of flooding. It is not agreed that allocations should be made over those required to meet the requirement - the Plan's assumptions on site capacities are conservative (assuming 20/hectare) and, in practice, it is likely that the Plan's provisions for Swineshead will deliver more than 400 dwellings, given that densities are likely to exceed this assumption. If evidence from the updated SFRA suggests that housing requirements for Crowland should be reduced, it is unlikely to be appropriate for a compensatory increase to be made in the requirement for Swineshead, given how far apart the settlements are located, i.e. It is unlikely that needs arising in Crowland could be satisfactorily met in Swineshead.

Officer Recommendation:

It is not considered that the comments made by the consultee justify a change to Swineshead's housing requirements, and consequently it is considered that the Local Plan should continue to seek to identify housing allocations in Swineshead to provide for 400 dwellings between 1st April 2011 and 31st March 2036.

requirement for Swineshead should be raised by at least a further one hundred new homes and that additional land over and above the currently envisaged preferred sites be allocated for new housing. This is especially so as proposed housing numbers in some other Main Service Centres, which are constrained by flood risk issues, are proposed to be significantly higher than the numbers proposed for Swineshead. In the case of Crowland, for example, five hundred new homes are proposed yet the report to the June meeting of the Joint Strategic Planning Committee (JSPC) explicitly noted that the updated Strategic Flood Risk Assessment is not yet available and that this will be necessary to help confirm whether the housing requirement for Crowland is appropriate. It is apparent from this that there is no certainty that the level of new housing provision envisaged within Crowland will be delivered.

Increasing the housing numbers in Swineshead would be achievable and would improve the chances of making the best use of this sustainable settlement which is free of the flood risk issues which are so prevalent elsewhere. Doing so will create more certainty and build more flexibility and resilience into the Plan, make it more likely that the overall housing requirement will be delivered and more likely that the minimum number of necessary new homes across the Plan area and within Swineshead will actually be delivered.

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

ID1: 569 comment_author: Paula Tunnard

comment_content:

I think that 130 homes are far too many to be built in a small village like Quadring.

Officer Comment:

The village has accommodated similar sized development over the last 25+ years: – the Boyfields estate, Casswell Drive and Charlotte Walk. It is only in the last local plan from 2006, that no development has been proposed in Quadring.

Officer Recommendation:

It is considered that the Local Plan should continue to identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036.

ID1: 570 comment_author: JHWalter LLP

comment_content:

The Boston Borough SHMA (July 2015) identifies that 84.6% of the Borough's housing needs to 2036 are within the town itself. The preferred sites result in 78.7% of the supply being within the town. It is noted that this is significantly less than the SHMA need. Whilst, Cyden Homes do not object to the proportion of housing being proposed for the town in response to the SHMA need, it should be no less than currently proposed and the emphasis should be on deliverable sites to meet this need.

Officer Comment:

Although the SHMA suggests that 84.6% of the Borough's housing needs (2011-2036) are within Boston, Revised Policy 12 directs just 78.66% of the housing allocations to the town. This discrepancy is intended to: reflect the general lack of availability of land at lower risk of flooding in and around the town; and allow the direction of slightly increased housing to the settlements between Boston and Spalding to take advantage of their 'cluster' potential. It is considered that this is an appropriate approach, and the objection does not seek to address these issues and does not set out any substantive arguments to justify an increase;

Officer Recommendation:

It is not considered that these comments justify a change to Boston's housing requirements, and (subject to the findings of an up-dated SHMA) it is considered that the Local Plan should continue to seek to identify housing allocations in Boston to provide for 5,900 dwellings between 1st April 2011 and 31st March 2036.

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

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|---|--|---|---------------|
| ID1: | 571 | comment_author: | Julia Beasley |
| comment_content: | Officer Comment: | Officer Recommendation: | |
| Moulton Chapel: | | | |
| The revised Local Plan for 130 dwellings is still a large amount, considering the size of the village and considering there will still be new builds in following years that these plans don't take into account. | The housing figure was reduced from 150 to 130 for the July consultation following the consideration of the potential housing sites that were subject to consultation in January 2016. Moulton was also reduced through the same procedure, although by more. Moulton has a higher Sustainability of Settlements score than Moulton Chapel and so reducing the figure for Moulton Chapel could be justified. However, after considering the impact of the two Preferred Sites for Development and the fact that Moulton Chapel is sequentially preferable to other settlements on the grounds of flood risk it is considered the housing figure should not change. | It is not considered that the comments made by the consultees justify a change to Moulton Chapel's housing requirements, and consequently it is considered that the Local Plan should continue to seek to identify housing allocations in Moulton Chapel to provide for 130 dwellings between 1st April 2011 and 31st March 2036. | |
| Whilst understanding the new Local Plan dictates we have to have more new houses in quantity rather than the minimal infill, I think this amount is too many. | | | |

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| ID1: | 572 | comment_author: | APB Planning |
| comment_content: | Officer Comment: | Officer Recommendation: | |
| Wrangle's housing requirements - The indicated level of provision for Wrangle is supported (100 dwellings). | Wrangle's housing requirements - The support is welcomed. | Wrangle's housing requirements - Given that no challenge has been made to Wrangle’s housing requirements, it is considered that the Local Plan should continue to seek to identify housing allocations in Wrangle to provide for 100 dwellings between 1st April 2011 and 31st March 2036. | |
| Residual requirements - There is consequentially a residual requirement for 52 dwellings to be accommodated within the village in order to satisfy the stated policy aspiration. However, that residual figure of 52 should not be seen as an absolute limit or 'cap' to further development. Indeed, there is justification and policy support through the NPPF to boost significantly the supply of housing and promote the presumption in favour of sustainable development by ensuring a realistic prospect of achieving the planned supply of housing by providing choice and competition in the market for land. | Residual requirements - Revised policy 12 identifies that “new housing site allocations will be made ... To meet the following housing numbers”. It does not suggest that the Plan’s allocations should seek to exceed these numbers – but, rather to meet them. Furthermore, the identification of housing sites is not an ‘exact science’, and a modest under or over-provision in any given settlement will not compromise the Local Plan’s strategy, nor conflict with national planning policy. Lastly, the Plan’s assumptions on site capacities are conservative (assuming 20/hectare) and, in practice, it is likely that allocated sites will deliver more dwellings than have been assumed. | Residual requirements - No change to the Plan is required in response to this comment. | |

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

ID1: 573 comment_author: Mr Richard Green

comment_content:

I support the limitation of allocation to 500 houses in the Kirton area. Although I would prefer less new development I accept that the Local Plan must take into account the Government's guidelines for new housing.

Officer Comment:

The support is welcomed.

Officer Recommendation:

It is not considered that this comment requires a change to Kirton's housing requirements, and consequently it is considered that the Local Plan should continue to seek to identify housing allocations in Kirton to provide for 500 dwellings between 1st April 2011 and 31st March 2036.

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

ID1: 574 comment_author: Geoffrey Collings & Co.

comment content:

The 'Housing Numbers' for Spalding, 5 of the Main Service Centres and 7 of the Minor Service Centres have increased (July 2016 figures compared to January 2016 figures). On the other hand, there has been a small reduction in the 'Housing Numbers' allocated to Long Sutton (a Main Service Centre) which is the fourth largest Settlement in the Local Plan area.

We consider the Distribution of New Housing requires adjustment in terms of the July 2016 Total Requirement attributed to Long Sutton. It requires to be increased for the following reasons.

In his Summer 2016 Newsletter to the residents of Long Sutton, The District Council member for Long Sutton and County Council Member comments 'knowing Britain as I do, I would put Long Sutton in the top dozen small towns in the United Kingdom. Make sure you support local businesses in the community'. The best way the Local Plan provisions can support local businesses in Long Sutton is to ensure there is a population growth over the Plan Period commensurate with its size and status. The current 'Housing Numbers' for Long Sutton anticipates the provision of an additional 304 dwellings during the Plan Period (i.e. to 2036) over and above the outstanding commitments and new properties built since 2011. In our opinion this is not sufficient to support an appropriate increase in population over the next 20 years.

There are 160 outstanding planning commitments in Long Sutton. Of these 87 relate to planning consent H11-0398-12, and 39 relate to H11-0123-13. A further

Officer Comment:

The scale of housing growth proposed for Long Sutton took account of many issues, including: the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish; population and household projections, the local rate of housing growth between 1976 and 2011; the availability of employment land, and the local availability of land at lower risk of flooding. In Long Sutton the availability of land at a lower risk of flooding was a main factor. However the additional 304 dwellings is a minimum requirement rather than a target. The developer of H11-0398-12 is working with the LPA to deliver a viable scheme, while the developer of H11-0123-13 has begun site clearance. Assumptions have been made relating to the delivery of all planning permissions (commitments); once planning permission has been granted the scheme has three years to commence or the permission lapses. Therefore it has been assumed that all commitments will commence in the next five years of the plan period. The Housing Implementation Strategy and the monitoring framework which will accompany subsequent versions of the Local Plan will identify how under-delivery will be managed. Therefore the above comment does not provide new evidence to support additional housing sites.

Officer Recommendation:

No change required.

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

21 Planning Commitments are identified in the 5 year Housing Land Supply Assessment (as at March 2016).

Planning consent H11-0398-12 was approved on the 27th January 2014. The consent will expire on the 27th January 2017. There is a comment in the Local Plan that if the approval is not implemented, the land will be taken out of the Settlement Boundary. We have always been of the opinion this consent is incapable of delivery.

H11-0123-13 was approved on 12 January 2015. The consent is subject to a Section 106 Agreement whereby the development is tied to the refurbishment of the adjacent semi-derelict Bull Hotel. We consider delivery of this consent is also problematic.

For the reasons given above there is a need to identify an additional Development Site in Long Sutton.

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|------------------|---|------------------|--|--|
| ID1: | 575 | comment_author: | Douglas and Jean Hemstock | |
| comment_content: | Quadring: Half the number of houses would be more than enough. | Officer Comment: | The village has accommodated similar sized development over the last 25+ years: – the Boyfields estate, Casswell Drive and Charlotte Walk. It is only in the last local plan from 2006, that no development has been proposed in Quadring. | Officer Recommendation: |
| | | | | It is considered that the Local Plan should continue to identify housing allocations in Quadring for 130 dwellings between April 2011 and 31st March 2036. |

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

ID1:

576

comment_author:

Home Builders Federation Ltd

comment_content:

As set out in the HBF response to the Draft Joint Local Plan consultation ended on 19th February 2016 the housing requirement of 730 dwellings per annum (300 dwellings per annum for Boston and 430 dwellings per annum for South Holland) is considered to be based on an under estimation of objectively assessed housing needs (OAHN) for market and affordable housing.

In this consultation it is noted that the Councils have rejected previously submitted comments for a more dispersed distribution of housing between the sub-regional centres of Boston and Spalding and Major, Minor and Other Therefore the Councils are continuing to propose 5,900 dwellings in Boston and 5,720 dwellings in Spalding. In Boston 19 sites with an estimated capacity of 4,681 dwellings to meet a residual housing need of 3,580 dwellings (after the deduction of 513 completions and 1,827 existing commitments) is identified. In Spalding 20 sites with an estimated capacity of 2,598 dwellings against a residual housing need for 2,599 dwellings are proposed.

However it is noted that a redistribution between other lower tier settlements is proposed. There are proposed reductions in housing provision in Whaplodes, Tydd St Mary, Sutton St James, Moulton Chapel, Moulton, and Long Sutton and increases in housing provision in Weston, Surfleet, Quadring, Gosberton, Gedney Hill, Fleet Hargates, Cowbit, Sutton Bridge, Pinchbeck, Donington and Crowland. The Councils should confirm that these increases and decreases in housing provision are equally balanced so that no unmet housing needs

Officer Comment:

The Objectively Assessed Housing Needs are subject to review.

Officer Recommendation:

Consider outcomes of the OAN reviews and any requirements to amend the Local Plan.

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

arise from these proposed changes in the distribution of housing. The Councils should also confirm that this proposed re-distribution remains consistent with Policy 12 of the Joint Local Plan.

Since the proposed housing requirement is a minimum figure it should not be treated as a maximum ceiling to restrict overall HLS and prevent sustainable development from coming forward.

It is noted that the proposed settlement boundaries (Policy 2) are contiguous with the existing permissions and proposed site allocations but are tightly drawn around each settlement. It is incumbent on the Councils to demonstrate that capacity within the settlement boundaries is sufficient to satisfactorily accommodate the minimum housing requirement. Moreover in the future the Councils may not be able to rely on as many windfall sites because of the work done to identify sites in the SHLAA combined with the tight restrictions imposed by the proposed settlement boundaries.

Whilst the HBF do not comment on the merits or otherwise of individual sites as a general observation there is very limited contingency in the proposed HLS to provide sufficient flexibility to respond to changing circumstances. Therefore it is suggested that greater headroom is provided. The Councils are referred to the DCLG presentation slide from the HBF Planning Conference September 2015 (see below - [presentation slide provided by email]). This slide illustrates 10 - 20% non-implementation gap together with 15 - 20% lapse rate. The slide also suggests the need to plan for permissions on more units than the housing start / completions ambition. It is

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

acknowledged that this presentation slide shows generic percentages across England but if the Councils are proposing a lower percentage then evidence to justify this position should be provided.

The recently published Local Plans Expert Group (LPEG) Report also recommends that the NPPF makes clear that local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the NPPF (para 11.4 of the LPEG Report).

If it is necessary for the Councils to allocate additional sites then to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets including multiple outlets on Sustainable Urban Extensions (SUE). Therefore for any given time period, all else being equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

Conclusion

For the South East Lincolnshire Joint Local Plan to be found sound under the four tests of soundness as

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

defined by the NPPF (para 182), the Plan should be positively prepared, justified, effective and consistent with national policy.

The Councils should re-consider OAHN, housing requirement and HLS in order to avoid preparing a Plan which is unsound by failing to be consistent with national policy, positively prepared, properly justified and so ultimately ineffective.

| | | | |
|------------------|---|-------------------------|--|
| ID1: | 577 | comment_author: | Robert Doughty Consultancy |
| comment_content: | Our previous representations requested that each allocation should be listed under Policy 12, either within the policy itself or in a dedicated appendix, although again that suggestion has not been considered in the current consultation, although a positive response has been made to similar suggestions to made by ourselves to Policy 7 [see comment under Inset Map 2 & 8]. | Officer Comment: | Comments noted |
| | | Officer Recommendation: | The option to include the Housing Allocation as part of the Policy or in the supporting text should be considered for the Publication draft. |

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

ID1: 578 comment_author: Gladman Developments Ltd

comment content:

1 National Planning Policy and Guidance

1.1 National Planning Policy Framework

[Summary - quotes Section 47 of the NPPF in relation to the role that Local Plan's have in meeting the objectively assessed need (OAN) for housing. Also quotes Sections 14, 152, 158 and 159 in relation to identifying and meeting the OAN. Section 182 is quoted with regards to the four tests of soundness in the NPPF.]

1.2 Planning Practice Guidance

[Summary - summarises the Housing and Economic Development Needs chapter of National Planning Practice Guidance.]

3 Objectively Assessed Housing Need

3.1 Context

[Summary - refers to Section 14, 47 and 152 of the NPPF as well as the need for preparation of a Strategic Housing Market Assessment (SHMA). Paragraph 159 is quoted and referred to in this section. Quotes part of the judgment of the High Court in Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited which considered the need to identify the full OAN before the ability of a Local Planning Authority (LPA) to accommodate that level of development is considered. Emphasises that LPAs should seek to deliver the full OAN and only where evidence shows that this is not achievable should other

Officer Comment:

The Objectively Assessed Housing Needs are subject to review.

Officer Recommendation:

Consider outcomes of the OAN reviews and any requirements to amend the Local Plan.

options be tested.]

3.2 South East Lincolnshire - Objectively Assessed Housing Need

3.2.1 It is clear that South East Lincolnshire is comprised of a diverse Housing Market Area (HMA) spread across two HMAs - South Holland located in the Peterborough Sub-Region and Boston Borough Council considered as a single HMA. Accordingly, two OAN studies have been used to support the emerging Local Plan. Gladman have serious reservations regarding the adequacy of the approaches used to identify the Councils' full OAN and consider both documents fail to identify a Framework and PPG compliant assessment of housing need.

Peterborough Sub Region OAN

3.2.2 Gladman note the OAN work produced by consultants GL Hearn on behalf of the Peterborough Sub-Region. At this stage we consider that the OAN does not adequately consider all aspects of the process outlined above in arriving at the full OAN for the Peterborough Sub-Region. As a consequence we consider that the study underestimates the housing needs of South East Lincolnshire and therefore unnecessarily reduces the housing requirement for the Local Plan area.

3.2.3 The October 2015 update only allows for an increase of 2 dwellings per annum for market signals adjustment to address the Council's affordability issues. The PPG makes clear of the need for an upward adjustment to improve worsening affordability. Gladman do not consider the upward adjustment of 2

dwelling's per annum is sufficient to improve South Holland's affordability issues. A recent appeal decision at Farnsfield (APP/B3030/W/15/3006252) demonstrates that a negligible upward adjustment does not justify making on a very limited adjustment to the supply. The Inspector found that if such an approach were followed more widely, then broader issues regarding affordability would remain unresolved. In light of this decision we consider greater thought should be given to the need for an upward market signals adjustment.

3.2.4 Further, since the publication of the Peterborough Sub-Region OAN update two important additional sets of demographic data and projections have been released. The Office for National Statistics (ONS) published the 2014-based Sub National Household Projections on the 25th May 2016, this subsequently led to the 2014-based Household Projections being published by the Department for Communities and Local Government on the 12th July 2016. It is important to consider the impact of these new figures on the housing needs of South East Lincolnshire to ensure that the plan is soundly meeting its housing needs.

Boston Borough OAN

3.2.5 The Boston Borough OAN (July 2015) prepared by JG Consulting identifies Boston Borough's full OAN as 302 dwellings per annum. Similar to the Peterborough Sub-Region OAN, this assessment identifies the OAN on the basis of the 2012-household projections and will also need to be updated to reflect the most up to date projections. Nevertheless, this assessment of housing need identifies the demographic starting point as 283 dwellings per annum. In applying market signals

adjustments, JG Consulting have applied a 7% uplift to account for household formation rates in the 25-34 age group. Despite this, the level of net affordable housing need identified in Boston is 6,245 dwellings (i.e. 250 dpa). This level of need represents around 83% of the full OAN of 302 dpa. Although noted that the Private Rented Sector (PRS) does make a potentially significant contribution to meeting affordable housing needs, it is not a recognised form of affordable housing and the Council should not be relying on PRS to confront its severe affordability issues. PRS cannot resolve housing shortages, these are determined by the overall relation between supply and demand, which could lead to shortages across the range of the housing market.

3.2.6 To conclude on this point, Gladman take this opportunity to make the Council aware of the Uttlesford, East Lindsey and Canterbury Local Plan Examinations, where the respective Inspector's applied a 10% and 20% uplift for market signals adjustment. It is our view that uplifts of this magnitude are the very minimum required in order to address the HMA's housing needs.

4.2 Revised Policy 12: Distribution of New Housing

4.2.1 In the first instance the Council will need to update its housing needs evidence for the HMA before any firm position is made on the distribution of new housing. As highlighted earlier in this response, the housing figures that the Council are currently targeting are based on out-of-date projections and that have now been superseded by the 2014 household projections. Gladman therefore reiterate the importance of updating and finalising this evidence base work before

the JSPC proceed on a housing figure which may not fulfil its housing needs and meet its responsibility under the DtC.

4.2.2 Notwithstanding the above. in terms of the proposed spatial distribution. the preferred option seeks to deliver growth primarily to the sub-regional centres of Boston (including parts of Fishtoft and Wyberton Parishes) and Spalding together with the Main Service Centres and Minor Service Centres. In principle. Gladman are supportive of the JSPC in distributing growth towards a diverse range of settlements. However. whilst Gladman are supportive of delivering growth towards principle settlements (i.e. Boston and Spalding), we are concerned that the emerging Local Plan places a significant emphasis on the delivery of Sustainable Urban Extensions (SUE) i.e. land to the North of Vernatt's Drain is expected to provide approximately 4.000 dwellings.

4.2.3 Therefore. we take this opportunity to highlight that an approach which targets significant development towards one location in the form of SUEs. following the historical approach to growth towards the principle settlements. will only allow the Council to deliver its medium to long term housing needs and will not address the affordability pressures that are currently being experienced across the local authority areas. Whilst the delivery of SUEs and/or a new settlement will allow the JSPC to deliver significant housing numbers to meet its housing needs. in addition to delivering new and/or significant improvements to local infrastructure assets to serve the proposed development. the delivery of such schemes can often be delayed as a result of extensive master planning, negotiations between various landowners, long lead in

times and may not deliver at the expected rate or scale envisaged. If either of these options are taken forward, the JSPC should avoid applying unrealistic delivery assumptions as a means of absorbing significant housing numbers that will consequently reduce the need for housing in other sustainable locations across the district. An approach that would apply unrealistic and overly ambitious delivery assumptions is not sound and can have serious implications for future housing delivery.

42.4 in allocating sites, the Council should be mindful that to maximise housing supply the widest possible range of sites by size and market location are required. so that house builders of all types and sizes have access to suitable housing land in order to offer the widest possible range of products. The key to increasing housing supply is the number of sale outlets. Whilst the delivery of SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall the sales and build out rates will be faster from 20 sites of 50 units than 10 sites of 100 or 1 site of 1,000. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary, a variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land, which in turn will assist the Council in maintaining a flexible and responsive supply of housing land and increased housing delivery.

4.2.5 Further, the housing numbers contained in

Revised Policy 12 are inclusive of extant planning permissions and dwellings built since 2011. Gladman note Policy 11: Meeting Objectively Assessed Housing Needs contained in the previous version of the emerging Local Plan made clear that overall, the Plan will deliver 'at least' 18,250 dwellings. Accordingly. Revised Policy 12 should not be seen as a cap on development and should instead include wording similar to that contained in Policy 11 to ensure that the housing figures for each settlement are considered as a 'minimum'.

.....

5 CONCLUSION

5.1.1 All sustainable settlements will have a pivotal role in delivery the Council's full housing and economic needs. The Council has made a positive start into the consideration of these issues, but substantial further work is still required if the plan is to progress. In order to meet the tests of soundness contained at s182 of the Framework, the emerging South East Lincolnshire Local Plan must be found to be positively prepared, effective, justified and consistent with national policy.

5.1.2 Having reviewed the consultation documents, Gladman are concerned that the housing figure currently being targeted is not based on a full understanding of the HMA's full OAN. The Council should delay the progression of the Plan and use this time to update its housing needs evidence base by developing an unconstrained housing needs figure which properly follows the guidance set out by the Framework and FPO using the most up-to-date projections available (i.e. 2014 Household Projections).

Should this reveal an increase to the total OAN, the Council should delay progression of the Local Plan in order to allow time to undertake the necessary evidence base work to identify further sites to meet the Councils' full OAN. Should this be the case, Gladman therefore reserve the right to comment on any additional changes as and when new evidence and a draft local Plan becomes available for consultation.

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

ID1: 579 comment_author: DLP (Planning) Limited

comment content:

2.0 PREFERRED SITES FOR DEVELOPMENT

Housing Supply

2.1 We note that that the current consultation seek comments supporting or opposing specific identified settlement and/or sites which the Joint Committee intend to allocate for development in the pre-submission South East Lincolnshire Joint Local Plan.

2.2 However, in the first instance we would like to reiterate the points raised in the Home Builders Federation (HBF) consultation response to the draft Local Plan Consultation earlier this year that questioned the housing requirement of 730 dwellings per annum as being based on an under estimation of the objectively assessed housing needs (OAHN) for market and affordable housing.

2.3 The HBF highlight that the OAHN calculation is set out in two separate reports, namely: Peterborough sub regional Strategic Housing Market Assessment (SHMA) Update October 2015; and Boston Borough SHMA Assessment Final Report July 2015. However, the HBF note that it is unclear if the methodology for the calculation of OAHN in the reports is the same.

2.4 Furthermore, the HBF comment that whilst the data and assumptions associated with the demographic based calculation of OAHN may be considered reasonable, the adjustments for identified suppressed household formation rates in younger age groups, overcrowding, worsening affordability and affordable housing needs

Officer Comment:

The Objectively Assessed Housing Needs are subject to review.

2.1/2.2/2.3/2.4/2.5/2.6/2.7/2.8 -

2.10/2.11/2.12/2.14 - It is not disputed that new development in flood risk areas can be made more flood resistant and resilient. However, regardless of any engineering solutions and adaptation measures employed, any new homes built in flood risk areas would still expose their occupants to residual risks. Consequently, the NPPF indicates that “local plans should apply a sequential, risk-based approach to the location of development ... By applying the Sequential Test” and “if necessary, applying the Exception Test”. Thus, the NPPF’s priority is clearly to steer development to areas with the lowest flood hazard, although the consideration of wider sustainability objectives can justify allocations in areas of greater hazard. It is considered that the Local Plan’s provisions are entirely consistent with the NPPF’s approach. It is not accepted that the Plan’s provisions for Boston lack flexibility/headroom – although Boston’s housing requirements (2011-2036) set out in Revised Policy 12 are for 5,900 dwellings, completions, commitments and Preferred Housing Sites significantly exceed this number. Furthermore, it is not accepted that the Preferred Housing Sites are lacking in terms of the range of site type and size they offer – a total of 19 sites are identified, two of 1,000+ dwellings, four of 200-999 dwellings, and thirteen of 10-199 dwellings. In addition, the trajectory identifies a further seven sites which,

Officer Recommendation:

2.1/2.2/2.3/2.4/2.5/2.6/2.7/2.8 -

2.10/2.11/2.12/2.14 - It is not considered that these comments justify a change to Boston’s housing requirements, and (subject to the findings of an updated SHMA) it is considered that the Local Plan should continue to seek to identify housing allocations in Boston to provide for 5,900 dwellings between 1st April 2011 and 31st March 2036.

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

are more questionable. The HBF suggest that a greater uplift should be considered to help deliver affordable housing.

whilst too small in size to be identified as allocations, are nonetheless deliverable or developable

2.5 On the assessment of affordable housing needs, the HBF state that the use of figures of 100 affordable dwellings per annum for Boston and 210 affordable dwellings per annum in South Holland in Policy 15 of the Draft Local Plan is misleading. The HBF highlight that these figures represent a lowering of the actual affordable housing need figure because some households in need live in the private rented sector. The unadjusted affordable housing figure for Boston is 250 affordable dwellings per annum representing 83% of OAHN figure rather than the third stated in Policy 15. There is therefore an argument for increasing total housing figures included in the Local Plan if it could help deliver the required number of affordable homes as set out in the Planning Practice Guidance (ID 2a-029-20140306). The HBF therefore suggested that the Joint Committee gives further consideration to affordable housing needs and we would concur.

2.6 The HBF also ask the Joint Committee to confirm that the economic growth policies of the Joint Local Plan and the housing requirement are aligned.

2.7 It is not clear from the documents published for consultation by the Joint Committee, if any of the above matters have been considered or indeed addressed.

2.8 In conclusion we concur with the HBF who consider that the housing requirement should be higher. In addition, we would also highlight that the housing requirement should not be treated as a maximum

figure or be used as a ceiling to restrict sustainable development. It is a minimum figure.

.....

2.10 We note that Policy 12 continues to propose to allocate new housing sites to accommodate 5900 new dwellings in Boston (including parts of Fishtoft and Wyberton Parishes). This represents 78.7% of the Borough's proposed new housing. However, there is clear evidence to support the direction of a higher proportion of the Borough's housing requirements to the town. In this regard it is noted that the Boston Borough Council SHMA (July 2015) identifies that 84.6% of the Borough's housing needs (2011- 2036) are within Boston Town. The Joint Committee state that the discrepancy between the SHMA figure and the Draft Local Plan reflects, in part, the general lack of availability of land at lower risk of flooding in and around the town.

2.11 We acknowledge that a significant amount of land within and around the town of Boston, and indeed South East Lincolnshire, is at risk of flooding. However, depending on the size of the site and viability considerations, engineering solutions and suitable adaptation measures can be provided to ensure that any potential flood risk is managed. Boston remains a sustainable location for development, and the need for housing in this location is accepted. There are sites available, which offer multiple benefits, and could be brought forward to meet the need, despite the fact they are located in an area at the risk of flooding.

2.12 Furthermore, we concur with the HBF's

observation in the most recent consultation response that there is very limited contingency in the proposed housing land supply to provide sufficient flexibility to respond to changing circumstances. We agree that greater headroom should therefore be provided. If it is necessary for additional sites to be allocated, then to maximise housing supply, the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. In this regard, the key to increased housing supply is the number of sales outlets including multiple outlets on Sustainable Urban Extensions (SUE). The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand.

2.14 The allocation of further sites in Boston will also provide greater certainty that Boston Borough Council will have a five year housing land supply on adoption of the Joint Local Plan.

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

ID1:

580

comment_author: Savills

comment_content:

We welcome the proposed increase in the amount of amount of housing development to take place in Crowland over the plan period. This has increased to the 500 units that are now proposed when compared to the 380 units that was proposed as part of the consultation draft version of the Local Plan in January and February 2016.

Notwithstanding the above proposed increase in housing numbers for Crowland, we consider that the proposed amount of 500 units should not be seen as a ceiling. Paragraph 14 of the National Planning Policy Framework, which sets out a presumption in favour of sustainable development, states that for the purposes of plan-making, this means that 'Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change ... '. In view of this, it is considered that the 500 units should be treated as a minimum provision, in order to provide sufficient flexibility should the allocations proposed by the Council, fail to deliver development as anticipated. We consider that in taking such an approach, this will provide for flexibility in accordance with Paragraph 14 of the NPPF.

Officer Comment:

Support noted. In response to the reference to paragraph 14 of the NPPF, it should be noted that emerging Local Plan Policy 10: Meeting Objectively Assessed Housing Needs refers to making provision 'for a net increase of at least 18,675 dwellings in South East Lincolnshire....'. In addition, Policy 11: Distribution of New Housing only specifies a target for the purpose of setting housing land allocations. It does not preclude additional housing provision within the boundaries of designated settlements being approved provided it is in accordance with other policies in the Local Plan. Moreover, the Local Plan's Housing Implementation Strategy will seek to ensure the availability of a five-year supply of deliverable housing sites should any of the proposed allocations fail to deliver development as expected.

Officer Recommendation:

No change required.

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

ID1: 581 comment_author: Tetlow King Planning

comment content:

We represent Rentplus, a company providing an innovative affordable housing model aimed at delivering discounted rented homes to buy for people who are unable to acquire a property on the open market but also trapped by ineligibility for existing affordable housing tenures.

It is important that the Council consider the delivery of affordable rent to buy as part of Revised Policy 12 as this has the potential to improve overall development viability and so improved overall affordable housing supply. By planning for the inclusion of this model the Council will ensure the Plan remains in conformity with current and emerging national planning policy, and is planning more effectively and positively for sustainable development to meet the full range of its residents' needs and aspirations.

In light of the significant number of development schemes that are re-negotiated to reduce affordable housing delivery, citing viability constraints, the rent to buy model should be supported in order to maximise affordable housing supply. The ready availability of private funding for Rentplus offers significant scope for early delivery on sites identified in the Policies Maps, including on strategic sites where early delivery of rent to buy homes would both improve overall site viability and encourage quicker development.

It may be useful for Rentplus to meet with relevant planning and housing officers to discuss the practical implications of delivering Rentplus rent to buy homes as part of the overall housing mix across the Plan area and to give further clarity on how support for the model within the Local Plan would be an innovative

Officer Comment:

Comments noted. It is suggested that Rentplus meets, initially, with officers in South Holland District Council's Strategic Housing section and Boston Borough Council's Housing Department to discuss the practical implications of delivering Rentplus rent to buy homes as part of the overall housing mix across the Local Plan area.

Officer Recommendation:

No change to the emerging Local Plan.

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

way for the Council to ensure that affordability across the area is improved, allowing for a far higher number of people to achieve home ownership.

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| ID1: | 582 | comment_author: | Anglian Water | |
| comment content: | | Officer Comment: | Officer Recommendation: | |
| It is noted that revised Policy 12 identifies the scale of housing to be met by new housing allocations at settlements within South Holland District and Boston Borough. | | Comments noted | No change to the Local Plan is recommended | |

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| ID1: | 583 | comment_author: | Historic England | |
| comment content: | | Officer Comment: | Officer Recommendation: | |
| Historic England wishes to maintain its previous comments in relation to this policy. | | Historic Englands comments have been taken forward on a site by site basis and further discussions with them have taken place. | To consider further amendments to site specific considerations as appropriate. | |

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

ID1: 584 comment_author: iba planning

comment content:

Land at Crease Drove:

Formal Representations

Whilst the increased number of houses (confirmed as a 'minimum') for Crowland and its retention as a 'Main Service Centre' are welcomed and supported, as is the inclusion of site CRO043 as a housing site, my client still has residual concerns regarding the way the draft Plan has so far been prepared and the consequences this will have on the overall test of soundness when independently examined.

For these reasons, she maintains her formal objection to the Draft Plan as originally submitted for consultation and to the subsequent amendments contained in the Preferred Sites for Development. Using the most up to date baseline evidence

Using the most up to date baseline evidence

Of significant concern is the admission that the Settlement Hierarchy (Policy 2) and the housing distribution amongst those settlements (Policy 12) have been heavily influenced by flood mapping data which is known to be under review.

In paragraph 2.3 of the Housing Paper for Crowland, the Council explains that, Although the updated SFRA is not available yet, it will be used to inform the selection of allocations in the Publication Draft Local Plan 2

Officer Comment:

Support for the housing target and identification of Crowland as a Main Service Centre is noted. Support for Cro043 is noted. The Local Plan, particularly Policy 2 and Policy 12 have been informed by the SFRA, with only the flood probability for settlements covered by the updated SFRA (Spalding, Pinchbeck, Crowland, Cowbit, Deeping St Nicholas and Surfleet) expected to change, therefore the majority of housing sites selected in Boston and the other Main and Minor Service Centres have been informed by up to date flooding data. Should the updated SFRA indicate that Preferred Sites in the identified settlements are not sequentially preferable in flood risk terms, and alternatives are introduced, these would be consulted upon during the Publication consultation. The Local Plan process is iterative and it is not unusual for updated evidence to be introduced at Publication stage where consultees will have 6 weeks to comment on proposals. Throughout the Local Plan preparation, it has been made clear that the updated SFRA was outstanding and that site selection could change to reflect the outcome. Therefore it is not accepted that Policies 2 and 12 have been predetermined, that the robustness of the current flood data is flawed or that the Plan has not been positively prepared. The updated SFRA identifies Crowland as having large areas of high flood risk, therefore it is not accepted that more housing should be directed to Crowland. It is also considered that by increasing the housing target from 380 to 500 does not arbitrarily curtail housing numbers for Crowland; this was informed by the findings of the South East Lincolnshire Assessment of Settlements & their Sustainability Credentials (June 2015); the population of the parish;

Officer Recommendation:

Cro043 is one of the more suitable housing sites in Crowland and should be taken forward as a Preferred Option Housing Allocation.

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

We are also told in that same section, The relatively high level of housing growth proposed in some of the Minor Service Centres stemmed largely from the availability of land without flood hazard in and around those settlements ☐

Given the Publication Draft Local Plan is due to be released for further consultation in October (this being effectively the Plan the Authorities will collectively submit for independent examination), there leaves little time for the updated SFRA to become available and to incorporate what could amount to substantial changes to both the Settlement Hierarchy and the distribution of housing numbers amongst the various settlements.

It will also deprive many of the chance to comment fully on the inclusion of sites (or on the inclusion of additional sites if/where required) in advance of the Publication Draft - i.e. One of the more advanced stages of the Local Plan review process.

In light of the above, this current consultation should quite clearly have first awaited the outcome/findings of the updated SFRA given its undoubted importance in defining the Settlement Hierarchy and housing distribution amongst settlements.

To predetermine both in advance of the availability and findings of the updated SFRA has serious repercussions on the robustness of the current flood data (as baseline evidence) and casts doubt as to whether the Plan has so far been positively prepared.

Clearly, there is support for more housing to be directed to Crowland.

the local rate of housing growth between 1976 and 2011 and the rate of employment growth since 2009 as well as land at lower risk of flooding and the findings of the SA and the IDP. Discounting housing allocations from the settlements in the lower tier of the hierarchy would undermine this approach and create an unsustainable pattern of development in South Holland, where shops and services within Minor Service Centres could be threatened because of a lack of appropriate growth. Conversely the infrastructure and services in Crowland could be adversely impacted upon from a housing target that is much higher.

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

Should the updated SFRA find in its favour, then there would be no need to arbitrarily curtail housing numbers for Crowland and, by association, no justification for the relatively high level of housing growth currently proposed to be directed to some of the less sustainable settlements.

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| ID1: | 585 | comment_author: | Longstaffs |
| comment_content: | Officer Comment: | | Officer Recommendation: |
| Land at Cowbit. We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Cowbit, to a level of 120 dwellings for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village, with its range of services and facilities, which need supporting by new housing for households and families. | The support is welcomed. | | It is considered that the Local Plan should continue to seek to identify housing allocations of 120 dwellings between April 2011 and 31st March 2036 because it reflects the capacity available from suitable sites. |

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

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| ID1: | 586 | comment_author: | Longstaffs |
| comment_content: | Land at Moulton. We consider the amendment proposed to Policy 12 , which provides to decrease the allocation of new houses for Moulton, to a level of 90 dwellings for the plan period 2011-2036, is a negative proposal. We understand the driver for the proposed reduction is that there were too many large sites put forward which were potentially suitable, and it was the preferred option to reduce the allocation, than have to increase it dramatically. | Officer Comment: Many of the sites that were submitted in the SHLAA were considered unsuitable owing to: <ul style="list-style-type: none">• Being incongruous with, or isolated from, the settlement• Having an unsuitable access• Possible noise disturbance• Its impact on listed buildings, TPO's and rural character. One of the four remaining sites now has planning permission and another is a small site which has not attracted objections. The two other sites are either large or does not fit in with the shape of the village and together would provide more than remains of the number being sort in Moulton. They also have access and drainage issues. It was therefore considered reducing the number for Moulton was appropriate so the large site is not put forward and the remaining site is reduced in size to fit better with the village. | Officer Recommendation: It is not considered that the comment made by the consultee justifies a change to Moulton's housing requirements, and consequently it is considered that the Local Plan should continue to seek to identify housing allocations in Moulton to provide for 90 dwellings between 1st April 2011 and 31st March 2036. |
| ID1: | 587 | comment_author: | Longstaffs |
| comment_content: | Site Wsn 010 Land at Weston We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Weston, to a level of 310 for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its good range of services and facilities, which need supporting by new housing for households and families. | Officer Comment: The Support is welcomed. | Officer Recommendation: Given that no challenge has been made to Weston's housing requirements, it is considered that the Local Plan should continue to seek to identify housing allocations in Weston to provide for 310 dwellings between 1st April 2011 and 31st March 2036. |

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

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| ID1: | 588 | comment_author: | Longstaffs | |
| comment_content: | Site Geh 005, Land at Gedney Hill. We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for the village, to a level of 120 new dwellings for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the 'Hub' village with its range of services and facilities, which need supporting by new housing for households and families | Officer Comment: | The support is welcomed. | Officer Recommendation: It is consider that the Local Plan should continue to seek to identify housing allocations of 120 dwellings between April 2011 and 31st March 2036. |
| ID1: | 589 | comment_author: | Longstaffs | |
| comment_content: | Site Wsn 007 Land at Weston. We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for Weston, to a level of 310 for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its good range of services and facilities, which need supporting by new housing for households and families. | Officer Comment: | The Support is welcomed. | Officer Recommendation: Given that no challenge has been made to Weston's housing requirements, it is considered that the Local Plan should continue to seek to identify housing allocations in Weston to provide for 310 dwellings between 1st April 2011 and 31st March 2036. |

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

ID1: 590 comment_author: Longstaffs

comment_content:

Site Sur 006, Land at Surfleet
We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for the village, to a level of 180 new dwellings for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village with its very good range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

The support is welcomed.

Officer Recommendation:

Given that no significant challenge has been made to Surfleet's housing requirement, it is considered that the Local Plan should continue to seek to identify housing allocations in Surfleet to provide for 180 dwellings between 1st April 2011 and 31st March 2036.

ID1: 591 comment_author: Longstaffs

comment_content:

Site Gos 006 Land at Gosberton
We consider the amendment proposed to Policy 12 , which provides to increase the allocation of new houses for the village, to a level of 270 dwellings for the plan period 2011-2036, is a positive proposal, and this higher allocation will provide for the greater and more satisfactory level of growth for the village, with its range of services and facilities, which need supporting by new housing for households and families.

Officer Comment:

The support is welcomed

Officer Recommendation:

Due to no challenge being made to Gosberton's housing requirements it is considered that the Local Plan should continue to seek to identify housing allocations of 270 dwellings between April 2011 and 31st March 2036.

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

ID1: 592 comment_author: Lincolnshire County Council

comment content:

It is noted that there are only minor changes to the distribution of new housing proposed in the January 2016 consultation on the draft Local Plan. At that stage our representations argued for higher housing provision in Holbeach. Although only a small increase is proposed LCC welcomes the selection of both main housing sites in Holbeach as Preferred Sites. The text of the Holbeach housing paper does not clearly state that, as shown in the trajectory, this would lead to significant overprovision, to be phased beyond the Local Plan period on both sites. This needs to be clarified in the Submission Draft Local Plan. The same need for clarification applies to all settlements with sites to be phased beyond 2036 (e.g. Boston, Spalding).

Lincolnshire Fire and Rescue

LFR has considered the preferred sites and would express concern regarding the numbers of properties being considered for higher than average flood risks, but note the conditions placed upon such sites. The increase in housing may well lead to a requirement for us to consider rolling out the co-responder duties to fire stations such as Spalding and Boston (subject to EMAS agreement) which do not currently undertake this role. Any such consideration would have to be considered by LCC Members and would have funding implications.

At development planning stages we would ask developers to consider the installation of domestic sprinklers as a fire prevention initiative and 32mm mains water risers.

Officer Comment:

The July 2016 consultation makes considerable changes in respect of sites from the January 2016 "site options" draft. It may be that the landowners sites in particular remain relatively unchanged. The changes to Holbeach have been acknowledged.

The Local Plan will need to provide evidence with regard to delivery and housing trajectories.

The Fire and Rescue comments are noted. It is necessary for the Local Plan to put forward proposals that might have an impact on such services. The alternative might be a piece meal approach to development provision through the planning application and appeal processes whereby the strategic issues and service implications might be lost.

Officer Recommendation:

No change to the Local Plan although background evidence will need to demonstrate the tests of soundness with regard to delivery