

# South East Lincolnshire Local Plan 2011-2036 Preferred Options Consultation May 2013

**Chapter\_Name:** 02 Spatial Portrait

<b>Response_Number:</b> 48	<b>Persons_Name:</b> Mrs J Hill	<b>Representing_Who?:</b> Herself
<b>Respondents_Comments:</b> Firstly I strongly criticize the wording used throughout this document, it is planning office speak, full of phrases and descriptions that ordinary people could easily miss-interpret. We are constantly being promised that information from Government or local Government will be clear and concise but as usually instead of plain English, words that folk would not normally use in their everyday vocabulary are used i.e. "has the potential to inundate valuable farmland with saline water and negate productivity for many years after" Why not just say that and " possibly flooding valuable farmland with sea water resulting in land being unusable for many years after"	<b>Officer_Response:</b> Comments noted. It is accepted that Local Plans need to communicate effectively.	<b>Officer_Recommendation:</b> Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).
<b>Response_Number:</b> 67	<b>Persons_Name:</b> Natural England	<b>Representing_Who?:</b> Themselves
<b>Respondents_Comments:</b> Natural England considers that the Spatial Portrait adequately describes South East Lincolnshire. Our particular interest in the natural environment is well covered including the description of the fenland landscape, the recognition of the ecological importance of Wash and the interlinked waterways which are part of the rich ecological network supporting the biodiversity of the area.	<b>Officer_Response:</b> Support noted.	<b>Officer_Recommendation:</b> Support - No change to the approach is required.

<b>Response_Number:</b>	124	<b>Persons_Name:</b>	Freya Trotman	<b>Representing_Who?:</b>	Herself
<b>Respondents_Comments:</b>	The Spatial Portrait, whilst accurate, does not reflect the current state of the historic water course used for drainage. Farmers have been permitted (or have chosen) to quietly "fill in" these old drainage ditches without piping them and they have been consequently "lost". These were essential in times of wetter weather and flood. If, as your documents suggests, high tides and climate change are likely to produce a greater risk of inundation, then these channels (as marked on IDB maps) should be surveyed and reopened to minimise flood risk. Otherwise the whole drainage pattern of the fenland area is threatened. For example: - when new drainage was being laid in Whaplode, no one could find any record of where the original river ran.	<b>Officer_Response:</b>	This issue is beyond the remit of the Local Plan. These comments are largely with regard to the perceived condition and maintenance of the extensive drainage system throughout the plan area. Such matters are the responsibility of land owners and the Internal Drainage Boards etc.	<b>Officer_Recommendation:</b>	Representations beyond the remit of the Local Plan or to be addressed in the preparation of the Site Allocations DPD

<b>Response_Number:</b>	155	<b>Persons_Name:</b>	Mr G Smith	<b>Representing_Who?:</b>	Mr S Harris
<b>Respondents_Comments:</b>	Add to the context statement: Minor settlements do not individually provide a good set of services and facilities so often work in conjunction with each other to provide dispersed but better service provision. Paragraph 55 of the NPPF applies here. This is of significance as the strategy does not appear to examine the benefits of otherwise unsustainable settlements working together.	<b>Officer_Response:</b>	This issue has been considered in the Preferred Options Document, specifically in the context of sustainable development and preferred policy approaches to the distribution of development between settlements.	<b>Officer_Recommendation:</b>	Objection - No change to the approach is required.

Response_Number:	184	Persons_Name:	Mr G Smith	Representing_Who?:	Mr and Mrs Ravell
Respondents_Comments:	Add to the context statement: Minor settlements do not individually provide a good set of services and facilities so often work in conjunction with each other to provide dispersed but better service provision. Paragraph 55 of the NPPF applies here. This is of significance as the strategy does not appear to examine the benefits of otherwise unsustainable settlements working together.	Officer_Response:	This issue has been considered in the Preferred Options Document, specifically in the context of sustainable development and preferred policy approaches to the distribution of development between settlements.	Officer_Recommendation:	Objection - No change to the approach is required.

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Response_Number:	193	Persons_Name:	Mr G Smith	Representing_Who?:	Spalding Lifestyle owners
Respondents_Comments:	Add to the context statement: Minor settlements do not individually provide a good set of services and facilities so often work in conjunction with each other to provide dispersed but better service provision. Paragraph 55 of the NPPF applies here. This is of significance as the strategy does not appear to examine the benefits of otherwise unsustainable settlements working together.	Officer_Response:	This issue has been considered in the Preferred Options Document, specifically in the context of sustainable development and preferred policy approaches to the distribution of development between settlements.	Officer_Recommendation:	Objection - No change to the approach is required.

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Response\_Number:

204

Persons\_Name:

Mr G Smith

Representing\_Who?:

Mr S Hatter

Respondents\_Comments:

Add to the context statement: Minor settlements do not individually provide a good set of services and facilities so often work in conjunction with each other to provide dispersed but better service provision. Paragraph 55 of the NPPF applies here. This is of significance as the strategy does not appear to examine the benefits of otherwise unsustainable settlements working together.

Officer\_Response:

This issue has been considered in the Preferred Options Document, specifically in the context of sustainable development and preferred policy approaches to the distribution of development between settlements.

Officer\_Recommendation:

Objection - No change to the approach is required.

Response_Number:	232	Persons_Name:	Woods Hardwick Planning	Representing_Who?:	Wheatley PLC
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>The Spatial Portrait is considered to be a fair representation of South East Lincolnshire. Paragraph 2.4 in particular highlights the significant population change that the Plan Area has experienced over the past 10 years. Both Boston Borough Council and South Holland District have seen an increase in population above both the national average and that of the County of Lincolnshire.</p> <p>Boston Borough: +15.9%  South Holland: +15.4%  Lincolnshire: +10.4%  National: +7.5%</p> <p>The population within the Plan Area is concentrated within the main settlements of Boston and Spalding. However, it is important to recognise, as the Consultation Draft does, that there are five area centres within South Holland, as designated within the current Local Plan. Within that plan area centres are described as: 'Area Centres are defined as the next tier in the settlement hierarchy. They provide a range of services, local employment opportunities and act as a focal point for the rural areas. These centres include the other towns of Holbeach, Crowland, Long Sutton and Sutton Bridge.'</p> <p>The establishment of a Settlement Hierarchy is important so as to achieve sustainable growth across the Plan Area. This is specifically identified within the National Planning Policy Framework (NPPF) 2012, which seeks to promote sustainable development in rural areas by locating housing where it will enhance vitality of rural communities. This could be achieved by supporting growth in a particular settlement, which may support other settlements nearby.</p>	Support noted.		Support - No change to the approach is required.		

It is also important to note the commentary in paragraph 2.5, where it is recognised that there is a distinct difference between Boston Borough and South Holland. Whilst both authorities share a commonality in terms of the primary settlements being of comparable sizes, the secondary settlements of South Holland are larger than those of Boston Borough.

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Response_Number:	260	Persons_Name:	Mr R Smith	Representing_Who?:	Pedals
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The Spatial Portrait does not describe South East Lincolnshire adequately. It rightly draws attention to the flat landscape of South East Lincolnshire, and several of the consequences of this which need to be taken into account in planning the development of the area. However, the Spatial Portrait fails to point out that the landscape lends itself to cycling, both as a means of transport and as a leisure pursuit. The Netherlands has a landscape which is similar to that of South East Lincolnshire. In The Netherlands, cycling is accommodated and promoted in both urban and rural areas. The Netherlands offers many examples of good practice in planning for sustainable, healthy, environmentally-friendly cycling which should be embraced in the planning of South East Lincolnshire.	Comments noted. These will be taken into account in the next stage of the plan-making process. The comments are part descriptive which are not adequately covered in the Spatial Portrait and part strategic and policy issues.		Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).		

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Response_Number:	261	Persons_Name:	Mr R Smith	Representing_Who?:	Pedals
Respondents_Comments:	A new paragraph should be inserted between paragraphs 2.2 and 2.3 of the main document to make these points, which then must be followed through in the analysis and proposals throughout the document.	Officer_Response:	These issues have been adequately addressed in the Preferred Options Document, specifically the preferred policy approach to 'Sustainable Transport and Accessibility'.	Officer_Recommendation:	Objection - No change to the approach is required.

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Response_Number:	315	Persons_Name:	Mr Neil Osborn	Representing_Who?:	Larkfleet Homes
Respondents_Comments:	Whilst we generally consider that the Spatial Portrait as set out in paragraphs 2.1-2.9 provides a picture of the area we do not consider that it is sufficiently broadly based to flag up some of the real issues that the Local plan will need to tackle. In particular whilst it references issues such as landscape character, travel to work and agriculture it gives scant reference to the diversity of employment, the need to regenerate and expand the economic base and issues such as migrant labour. In particular it does not refer to the housing market, to issues of delivering sufficient housing for a changing population and the pressures that arise from certain residential sectors such as housing suitable for those who are retired.	Officer_Response:	Comments noted. These will be taken into account in the next stage of the plan-making process. The comments are part descriptive which are not adequately covered in the Spatial Portrait and part strategic and policy issues.	Officer_Recommendation:	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

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Response_Number:	316	Persons_Name:	Mr Neil Osborn	Representing_Who?:	Larkfleet Homes
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The Spatial Vision should therefore be widened to recognise that the area as a whole is not homogenous but has great diversity with different prevailing pressures in different geographic locations.	Comments noted. These will be taken into account in the next stage of the plan-making process.		Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).		

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Response_Number:	427	Persons_Name:	Crowland Parish Council	Representing_Who?:	Themselves
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The Spatial Portrait is assumed accurate and as such appears to cover all issues we would expect to see included. However, Crowland does have a designated wildlife area.	The significance of all natural habitats is adequately addressed in the Preferred Options Document.		Objection - No change to the approach is required.		

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Response_Number:	537	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
We agree that the Spatial Portrait describes South East Lincolnshire adequately.	Support noted.		Support - No change to the approach is required.		

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Response_Number:	538	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
No change is suggested.	Support noted.		Support - No change to the approach is required.		

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Response_Number:	589	Persons_Name:	Mr R Doughty	Representing_Who?:	A W Tindall
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
We agree that the Spatial Portrait describes South East Lincolnshire adequately.	Support noted.		Support - No change to the approach is required.		

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Response_Number:	590	Persons_Name:	Mr R Doughty	Representing_Who?:	A W Tindall
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
No change is suggested.	Support noted.		Support - No change to the approach is required.		

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Response_Number:	654	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
This is generally a fair portrayal of South East Lincolnshire.	Support noted.		Support - No change to the approach is required.		

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Response_Number:	655	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
I am pleased that recognition is given to the poor connectivity of the area, especially with reference to highways, and the resulting isolation The heavy volume of traffic passing through Boston is also a key acknowledgement	Support noted.		Support - No change to the approach is required.		

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Response_Number:	656	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	It is right that the importance of SE Lincolnshire to the nation should be fully appreciated	Officer_Response:	Support noted.	Officer_Recommendation:	Support - No change to the approach is required.

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Response_Number:	657	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	<p>Greater emphasis should be made on the lack of connectivity within the area, in particular the need for HGVs and farm vehicles to travel between locations to the north or north east of Boston through to Spalding or beyond.</p> <p>There is no mention of the fact that the A52 serves as the gateway to part of the Lincolnshire coast from much of the Midlands and south east of the country. In particular the impact on the accessibility of Skegness should be recognized even though not part of the area covered by this plan.</p>	Officer_Response:	This issue has been adequately addressed in the Preferred Options Document. The Spatial Portrait does refer to HGV and farm vehicles having an impact upon the highway network without being specific about particular directions of travel. However the Spatial Portrait is explicit about the greatest weight of traffic being upon the principal routes north, south, east and west. The Spatial Portrait mentions the Plan area as a through route to the tourist areas of Lincolnshire and Norfolk although the traffic impact is not mentioned.	Officer_Recommendation:	Objection - No change to the approach is required.

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Response\_Number: 684

Persons\_Name: Tom Gilbert - Wooldridge

Representing\_Who?: English Heritage

Respondents\_Comments:

We welcome the reference to the historic environment in the Spatial Portrait, particularly in paragraphs 2.2 and 2.8. With regards to “vertical structures” (paragraph 2.2), churches and other historic structures (e.g. Rochford Tower) form an important and valued component of the South East Lincolnshire landscape. It will be important to ensure that modern vertical structures (including wind turbines and tall buildings) do not detract from the significance and dominance of these heritage assets. This should be reflected elsewhere in the plan.

Officer\_Response:

This issue has been adequately addressed in the Preferred Options Document, specifically preferred policy approach 'Climate Change and Renewable and Low Carbon Energy'.

Officer\_Recommendation:

Objection - No change to the approach is required.

Response\_Number:

685

Persons\_Name:

Tom Gilbert - Wooldridge

Representing\_Who?:

English Heritage

Respondents\_Comments:

In paragraph 2.8, while it is true to say that the built heritage of Boston town “is regarded as being of national significance by English Heritage”, it should be noted that we regard much of Boston’s non-built heritage to be of national significance too (i.e. many of Boston’s archaeological sites as well as designed and historic landscapes within and around the town). We also regard many of the heritage assets across South East Lincolnshire to be of national significance; this applies to all designated heritage assets, but also applies to many undesignated assets too (e.g. archaeological sites). The above phrase in paragraph 2.8 could be reworded to say “The town of Boston has three conservation areas and many of its heritage assets are regarded as being of national significance by English Heritage (along with many heritage assets across South East Lincolnshire)”.

Paragraph 2.8 should also refer to the number of scheduled monuments and registered parks and gardens across the plan area. There are 45 scheduled monuments in South East Lincolnshire (16 in Boston and 29 in South Holland) and two registered parks and gardens (one each in Boston and South Holland). There should also be reference to undesignated heritage assets within the plan area, which will include historic buildings and parks as well as numerous archaeological sites (both known and unknown).

Officer\_Response:

Comments noted. The comments are quite detailed and perhaps more relevant to the respective policy mechanisms of the Plan. However it is recognised that the Spatial Portrait could provide a fuller picture of the heritage assets of the plan area.

Officer\_Recommendation:

Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

Response_Number:	752	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
We agree that the Spatial Portrait describes South East Lincolnshire adequately.		Support noted.		Support - No change to the approach is required.	

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Response_Number:	753	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No change is suggested.		Support noted.		Support - No change to the approach is required.	

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Response_Number:	807	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:	We agree that the Spatial Portrait describes South East Lincolnshire adequately.	Officer_Response:	Support noted.	Officer_Recommendation:	Support - No change to the approach is required.

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Response_Number:	808	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:	No change is suggested.	Officer_Response:	Support noted.	Officer_Recommendation:	Support - No change to the approach is required.

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Response_Number:	860	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
We agree that the Spatial Portrait describes South East Lincolnshire adequately.		Support noted.		Support - No change to the approach is required.	

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Response_Number:	861	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No change is suggested.		Support noted.		Support - No change to the approach is required.	

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Response_Number:	917	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	We agree that the Spatial Portrait describes South East Lincolnshire adequately.		Officer_Response:	Support noted.	
				Officer_Recommendation:	Support - No change to the approach is required.

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Response_Number:	918	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	<p>Paragraph 2.3 refers to the potential flood risk, but does not qualify this with reference to actual events. It is many years since there was a flooding event from coastal flood defence failure and this should be stated in the text.</p> <p>We also suggest that the word 'would' should be replaced with the word 'could' in the sentence "Such an extreme consequence would come about as a result of the highest tides (predicted to be common in 100 years' time) coupled with storm surge conditions causing major breaches in coastal and/or tidal defences", as there is not the certainty inferred.</p> <p>Paragraph 2.9 should not express surprise as the significance of South East Lincolnshire, but should state this as a matter of fact.</p>		Officer_Response:	<p>Comments noted. These issues have been adequately addressed in the Preferred Options Document. Flood risk is undoubtedly a major issue for the Plan to deal with and its historical significance is a constant reference alluded to by many. However international, national and local policy is to take a precautionary approach to flood risk because of the predicted effects of climate change. Substituting the word "would" for "could" is, to a certain, extent semantics. The context currently used does suggest a precautionary approach that will be expected of the Plan. Use of the word "surprisingly" is to emphasize that the importance of the area might be overlooked because it is sparsely populated and predominately rural. Drawing attention to how the importance of the area might be underestimated is felt to give more emphasis and impact.</p>	
				Officer_Recommendation:	Objection - No change to the approach is required.

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Response_Number:	977	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
We agree that the Spatial Portrait describes South East Lincolnshire adequately.		Support noted.		Support - No change to the approach is required.	

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Response_Number:	978	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No change is suggested.		Support noted.		Support - No change to the approach is required.	

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Response_Number:	1028	Persons_Name:	Mr R Doughty	Representing_Who?:	K Enderby
Respondents_Comments:	The Spatial Portrait describes South East Lincolnshire adequately.		Officer_Response:	Support noted.	
				Officer_Recommendation:	Support - No change to the approach is required.

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Response_Number:	1048	Persons_Name:	Mr R Doughty	Representing_Who?:	Richard Pearson Ltd
Respondents_Comments:	The Spatial Portrait describes South East Lincolnshire adequately.		Officer_Response:	Support noted.	
				Officer_Recommendation:	Support - No change to the approach is required.

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Response_Number:	1070	Persons_Name:	Jenny Young	Representing_Who?:	Heritage Trust of Lincolnshire
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Q1 & 2 - scheduled monuments, parks and gardens, undesignated archaeological remains and local buildings of interest are not mentioned. There is no mention of historic landscape characterisation.	That the comments are noted. Many of the types of heritage attributes are evaluated through the policy processes of the Plan. The Spatial Portrait alludes to the rich history of South East Lincolnshire without providing an exhaustive list of heritage attributes. It is accepted that a broader range of heritage attributes could be cited in the Spatial Portrait.		Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).		

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Response_Number:	1180	Persons_Name:	Angela Newton	Representing_Who?:	Mr J and Mr G Eyett
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Yes	Support noted.		Support - No change to the approach is required.		

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Response_Number:	1216	Persons_Name:	Mr P Walls	Representing_Who?:	Himself
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
Q1 Is a portrait of the District as it is now, not as it in all probability will be.		Comment noted. The Spatial Portrait is a description of the area as it is now.		Objection - No change to the approach is required.	

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Response_Number:	1223	Persons_Name:	Mr J Brown	Representing_Who?:	Ambrose Lighton
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
Q1 - Does the Spatial Portrait describe South East Lincolnshire adequately?		This issue has been adequately addressed in the Preferred Options Document. Specifically, the Spatial Strategy section is the main area of the plan which will determine the appropriate level of growth given to settlements.		Objection - No change to the approach is required.	
We consider that the Spatial Portrait provides an adequate description of South East Lincolnshire. However, the reference at paragraph 2.5 of the sub-text to outlying settlements being smaller in Boston Borough should not undermine the important role of the 'Main Service Centre' of Kirton which should be a key focal point for future growth.					

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Response_Number:	1292	Persons_Name:	Mr J Charlesworth	Representing_Who?:	Spalding and District Civic Society
Respondents_Comments:	No	Officer_Response:	Comment noted. No further action can be taken since no amendments have been proposed.	Officer_Recommendation:	Objection - No change to the approach is required.

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Response_Number:	1293	Persons_Name:	Mr J Charlesworth	Representing_Who?:	Spalding and District Civic Society
Respondents_Comments:	Question 2 - Does there need to be a paragraph describing the age-profile of the Plan area – with its disproportionate numbers of the elderly and exodus to university of young adults who don't return or aren't replaced owing to the shortage of employment opportunities at degree level – and its consequences. Does there also need to be some reference to education? The closure of village primary schools, for example, and St Guthlac's at Crowland all have implications for transport and sustainability. 4th Para – The far-reaching consequences of the 14,000 seasonal workers – particularly in distorting the housing market – are completely ignored by the document. If the very much smaller number of gypsies, travellers and travelling show people merit a separate policy, how much more so do 14,000 seasonal workers	Officer_Response:	These issues have been adequately addressed in the Preferred Options Document. Whilst the issues the respondent raises are common perceptions we have little hard evidence of the impact the factors have in land use planning terms. Most of the arising issues; investment in health care, education and employment creation need initiatives from other public and private sectors. Arguably the population growth experienced in the plan area has countered the trends the respondent highlights. We have no evidence that the 14,000 seasonal workers have distorted the housing market although there is the perception that an increase in the number of people in private rented and houses in multiple occupation has occurred. Until we have further evidence it is unknown how this impact might change the plan's approach on housing delivery. Provision for gypsy, travellers and travelling showpeople is a legislative requirement and has distinct considerations and impacts which require a specific policy approach.	Officer_Recommendation:	Objection - No change to the approach is required.

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Response\_Number: 1371

Persons\_Name: Mr P Walls

Representing\_Who?: Himself

Respondents\_Comments:

Q2 Population growth should match new dwelling provision. The 2011 census return shows that in Boston and South Holland, the recorded population growth rate was 50% more than the population growth rate for Lincolnshire. With an average household size of 2.5 the planned new build could accommodate '@ 35000 residents giving an anticipated population in the plan area of @185000. If the population growth of the period 1991 2011 continues then the projected population growth in the plan area will exceed 200000. The available evidence suggests that population growth in the Plan area will exceed that of the county. \* The largest population bands by age cohort are in the 46-49, 60-64, 50-54, 55-59 age range. By 2031 these age cohorts will in the main be economically inactive. This suggests the influx of inward migration will continue with no evidence that these age cohorts will migrate out of the district.

The census return identified the continued outward migration of young adults and a continuing increase in the local birth rate.

Improvements in the housing market will encourage older households to capitalize on the increased value of their South East of England homes and migrate to areas attractive to live in like South East Lincolnshire.

The national census indicates there is a growing exodus from the conurbations of younger white families.

Improved rail passenger services will potentially follow the improved track and signalling system of the revamped railway even if the proposed Road Rail Freight Interchange does not materialize.

What is the evidence to support the premise that South East Lincolnshire's rate of population growth will not exceed that of the county?

The projected new build dwellings total over the plan period, make no allowance for the development on

Officer\_Response:

Comments noted. These are, in general, issues the respondent also raises at length in response to specific policy concerns. Although the respondent has responded to the Spatial Portrait there is no indication of how the comments could usefully change the Spatial Portrait.

Officer\_Recommendation:

Objection - No change to the approach is required.



windfall sites. Windfall sites are usually small developments that may escape the financial burden of the development levy and affordable housing provision. Within a settlements development envelope there is a presumption that an appropriate development proposal could be approved. If the intention is to let windfall development fill any gap in the planned provision of housing is in effect a negation of the principal of planned land use.

The whole of the plan area is a natural flood plain. Tectonic geological change coupled with possible significant climate change poses potential serious threat of marine flooding. Climate change coupled with continued development in the upland areas, have increased the incidence of flash flood and rapid runoff. Higher water levels in the major watercourses across the fens strain the capacity these water courses to store excess surface water runoff. The bed of these water courses is often higher than the surrounding land. While the monthly average rain fall records for the plan area show a barely significant increase the incidence of rain fall illustrates a pattern of intense down pours. The inland drainage boards now consider themselves as being in the management of ground water levels business for their major client in the local agricultural/horticultural industry. Ground water levels are maintained at a high level during the summer months. Short heavy downpours plus a high ground water level can result in waterlogged ground. Sustainable Urban Drainage Systems (SUDS) are designed to hold excess surface water runoff in the upland areas in storage zones to let the excess water be dissipated by gravity. In a natural flood plain with high ground water levels SUDS simply raise the ground water levels which then has to be pumped or use low gravity flow systems that are only effective at low tide. The unforeseen consequence is that SUDS divert capital expenditure on flood risk mitigation to upland areas when the government is reducing the level of grant aid

for major drainage enhancement schemes.

Before the 2008 financial crisis the national government policy stance was changing. Those who benefit from the public expenditure on flood risk prevention, mitigation and post flood compensation should be expected to make a larger contribution towards the cost of flood risk management. The proportion of the total drainage board Precept that the councils in the plan area can recoup from central government revenues has fallen well below the 100% it used to be in the early 2000s. The concordat between the Association of British Insurers (ABI) has yet to be reaffirmed. The ABI proposal is that they would impose a £10 levy on all property and house effects policies to keep insurance in high flood risk zones affordable but in return the government would guarantee excess claims arising from a major flood event. The ABI has agreed to continue to honour existing insurance policies contracts but has indicated that premiums will need to be increased substantially. The ABI has not yet agreed to offer affordable policy contracts but has indicated that premiums will need to be increased substantially. The ABI has not yet agreed to offer affordable policy contracts to new build or new clients in existing properties. No flood risk insurance no mortgage finance. Houses new or old will become unsellable other than at prices which will leave most owners with massive negative equity on their property.

Boston and South Holland were among the top three recipients of central government grant aid for meeting drainage board precepts, in receiving grant aid for drainage infrastructure maintenance and enhancement. The plan area has been and will be one of the major loses in the continuing changes in flood risk mitigation and resilience policy at national level.

For these reasons it would be prudent to prohibit any development in the red flood risk zone and only approve necessary infrastructure installations if there

are no suitable alternative sites and the installation is fully protected and resilient in the event of a major flood incident. In a recent county wide exercise to evaluate resilience to a serious flood event 51 out of 54 of one IDB's water/drainage management installations would have ceased to operate. Development in the orange and yellow flood risk zones would only be permitted if the appropriate flood risk prevention, mitigation and resilience measures were a planning consent condition. Effective flood risk resilience measures fall under the regulatory regime of Building Regulations. Concomitant changes to Building Regulations are required to compliment the policies in the plan. If not the plan will fail to address some of the issues identified in later sections.

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