

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

Chapter_Name: 04 Housing Growth and Flood Risk

Response_Number: 3

Persons_Name: Carol M Burton

Representing_Who?: Herself

Respondents_Comments:

The plan to put new housing in one large block does not seem ideal, especially if the block is remote from the life of the town centre. I would rather see it broken up into smaller blocks on Brownfield sites and to this end I would be glad to see greater use of compulsory purchase where sites are derelict and no longer serving a useful purpose. Railway land springs to mind and also large sites containing the most ugly derelict buildings, e.g. that dreadful old post office building in the Crescent opposite the Free Press. One further thought: - rural areas around here are dotted with no longer needed farm yard complexes of considerable size. These are large enough to make space for complete new mini villages and would do something to alleviate pressure for new housing in town.

Officer_Response:

This issue has been adequately addressed in the Preferred Options Document. Given the level of housing that is required to be delivered over the plan period there is a need for significant greenfield development at Spalding in the form of an urban extension. Furthermore, the need to control residential development is also adequately addressed in the Preferred Options Document.

Officer_Recommendation:

Objection - No change to the approach is required.

Response_Number:

17

Persons_Name:

Jeff Elms

Representing_Who?:

Himself

Respondents_Comments:

Basically the planned provision is dramatically too low, particularly for Boston.

Following the 2011 census the latest ONS estimate is for Boston's population to increase by 11,000 during the period 2011 – 2021. If the average household remains constant at about 2.4 persons this equates to 4583 houses in total or 458 per year. Just over double what's in the plan.

For South Holland the numbers are 14,000, 5833 & 583. This is better but still some 25% under the ONS projections.

Given that the council is constantly arguing that central government consistently under estimates Boston's population growth to disbelieve them at this time seems a little strange.

I would also state that I want to live in a modern thriving community with good services, transport links & opportunities. To provide this the area needs to achieve a suitable critical mass to attract and fund this provision. Being sparsely populated has been tried and does not bring many rewards to the population. Let's grasp this opportunity and go for a modern properly populated community with the improved provision of opportunities that brings.

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:

38

Persons_Name:

Martin Bagshaw

Representing_Who?:

Mr and Mrs Mc Carthy

Respondents_Comments:

Our client would accept that there is a need to outline an approach to flood risk within the local plan however it does have to be acknowledged that the detail as to how that approach is implemented in regard to specific proposals is a matter that should be dealt with at the Development Management stage in accordance with Part 10 of the NPPF. As such the Sequential Test would be a requirement for any proposal within an identified flood zone and as such this would give preference to sites at a lower risk.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

39

Persons_Name:

Martin Bagshaw

Representing_Who?:

Mr and Mrs Mc Carthy

Respondents_Comments:

The proposed approach to delivering housing identifies two reasonable options of which Option A suggests that housing targets are identified following objectively assessed housing needs surveys in accordance with Paragraph 47 of the NPPF.

Our client considers this to be the correct approach but would question the use of figures for the South Holland area which were last assessed in the Peterborough Sub-Region SHMA of 2010. These figures are now considered to be significantly out-of-date, fail to represent an up to date and objectively assessed housing need and do not examine requirements up to the end of the plan period. In this regard our client is of the considered opinion that the level of annual housing provision required to be provided in South Holland over the plan period is likely to be in excess of the 470 dwellings per annum set out in Table 4.6, although the proposed figure would need to be determined through the completion of an up to date SHMA.

With regard to the second option our client considers that it is not appropriate to apportion and extrapolate figures from the East Midlands Plan as this has now been abolished although it is accepted that this has occurred in the period since the consultation document was approved for publication by the committee for the purposes of consultation.

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:

40

Persons_Name:

Martin Bagshaw

Representing_Who?:

Mr and Mrs Mc Carthy

Respondents_Comments:

The proposed approach to delivering housing identifies two reasonable options of which Option A suggests that housing targets are identified following objectively assessed housing needs surveys in accordance with Paragraph 47 of the NPPF.

Our client considers this to be the correct approach but would question the use of figures for the South Holland area which were last assessed in the Peterborough Sub-Region SHMA of 2010. These figures are now considered to be significantly out-of-date, fail to represent an up to date and objectively assessed housing need and do not examine requirements up to the end of the plan period. In this regard our client is of the considered opinion that the level of annual housing provision required to be provided in South Holland over the plan period is likely to be in excess of the 470 dwellings per annum set out in Table 4.6, although the proposed figure would need to be determined through the completion of an up to date SHMA.

With regard to the second option our client considers that it is not appropriate to apportion and extrapolate figures from the East Midlands Plan as this has now been abolished although it is accepted that this has occurred in the period since the consultation document was approved for publication by the committee for the purposes of consultation.

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:	41	Persons_Name:	Martin Bagshaw	Representing_Who?:	Mr and Mrs Mc Carthy
Respondents_Comments:	Our client does not support the figures set out in Figure 4.1 as it is considered that setting a limit as to the amount of development that will be allowed within the ROY flood areas jeopardises the ability of the individual LPA's to meet their housing requirements where sites outside of the ROY area do not come forward. A significant proportion of South East Lincolnshire falls within the ROY areas resulting in very few unaffected sites being available and in locations where new development would be most sustainable in terms of accessibility to services and facilities. In this regard our client also does not support Option B (Paragraph 4.22.1) as there is no evidence base to support the respective figures and percentage reductions set out in paragraph 4.18.3 of the document.	Officer_Response:	The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22. 'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.' These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:	49	Persons_Name:	Mrs J Hill	Representing_Who?:	Herself
Respondents_Comments:	You talk about climate change bringing the threat of extensive flooding when most of the predictions regarding climate change have been shown to be vastly over-estimated. There were serious floods in the 1950's from Mablethorpe and all the way down the East coast when there was a fraction of the road vehicles we have today and air travel was rare.	Officer_Response:	Comments noted. The Preferred Options Document has been produced in the context of the best available evidence in all regards and in accordance with the accepted national policy approach on climate change and flood risk.	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:	130	Persons_Name:	Freya Trotman	Representing_Who?:	Herself
Respondents_Comments:	Why is it not a planning requirement to obtain council permission to block pave more than 10% of a household garden in a built up area? A great deal of urban flooding is exacerbated by so many people paving over their entire gardens in a built up area.	Officer_Response:	In considering planning applications the use of permeable materials to minimise flood risk can be a material consideration. Flood risk is a consideration of the Local Plan but specific mitigation proposals are varied and considered on a site specific level.	Officer_Recommendation:	Representations beyond the remit of the Local Plan

Response_Number:	134	Persons_Name:	Mr J S Birkett	Representing_Who?:	Himself
Respondents_Comments:	My understanding is that the Regional Plan was revoked in 2013, and that the Coastal Strategy has never enjoyed any statutory status. This is important to the amount of weight to be given to their provisions, and their status should be made clear if they are referred to in any future local plan documents.	Officer_Response:	Comments noted. The Coastal Strategy (Study) has been given similar status to that which might have been given it had it been taken forward in informing the review of the RSS, i.e. material evidence to be assessed in deciding policy approaches.	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:	135	Persons_Name:	Mr J S Birkett	Representing_Who?:	Himself
Respondents_Comments:	<p>It is important that an artificial lid is not put on development that may suppress economic growth, prevent the area from fulfilling its envisioned role and lead to overcrowded housing. The recent history of the area has amply demonstrated that population growth and economic activity are not constrained (nor stimulated) by numerical planning targets. If the economic conditions are right, the people will come anyway, and restrictions will simply produce overcrowding and sub-standard living conditions.</p>	Officer_Response:	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	136	Persons_Name:	Mr J S Birkett	Representing_Who?:	Himself
Respondents_Comments:	<p>It feels here as though the cart has been put before the horse. Firstly the amount of housing development that the area needs to fulfil local and wider strategic needs should be determined. Then consideration should be given as to how and where this growth might best be achieved taking into account limiting factors, one of the most important of which is flood risk.</p> <p>It needs to be clarified as to whether flood hazard or probability is going to be the critical factor in measuring flood risk. Government policy appears to centre on probability rather than hazard.</p> <p>The meaning of the second sentence of this Para is far from clear – largely due to the double use of the word, 'where'. The sentence is also far too long.</p>	Officer_Response:	<p>Comments noted. As it currently stands both hazard and probability are considered and, dependent upon particular site locations and proposed uses, hazard or relative probability might be the critical consideration. The wording of the second sentence of the Policy is accepted as being somewhat complex. This comment will be taken into account in the next stage of the plan-making process.</p> <p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>

Response_Number:	137	Persons_Name:	Mr J S Birkett	Representing_Who?:	Himself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Question 13 states that limits have been placed on the numbers of new homes that can be built in the 'severest flood hazard zones'. I would question whether this is the correct approach as:</p> <ul style="list-style-type: none"> • National Planning Policy Framework refers to 'probability', not 'hazard' (See NPPF Para 101) • The NPPF also advises that where flood risk cannot be avoided altogether, then development should be sited in an area with a lower probability of flooding (see NPPF Para 102) • 'Hazard' is only an appropriate factor to take into consideration when a choice needs to be made between zones of similar flooding probability. It would not be sensible to favour development in a zone where hazards are low, but the probability of flooding is 1 year in 10, compared to an area where hazards are high but probability is 1 year in 500. • As far as I have been able to read, no account has been taken of the proposed flood barrier to be built on the Haven, which will greatly reduce probability of flooding in Boston. It seems very strange to plan to spend over £40m on such a project and then completely ignore its benefits. • It would be more sensible to calculate the likely future need and demand for housing in each locality within the local plan area, and then accommodate it within the areas of lowest flooding probability which are available. It would not make sense to 'transfer' demand from Boston to Algarkirk or Spalding. If people wish to live in Boston then that is where they will go. They will not consult the local plan first. 	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>		<p>Objection - No change to the approach is required.</p>		

Response_Number:	138	Persons_Name:	Mr J S Birkett	Representing_Who?:	Himself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Option A is chosen as the preferred option as, 'it is considered deliverable when compared with historic building rates' and due to the problem of demonstrating a 5 year supply of land. I believe that these reasons are insufficient, and too pragmatic. They should be based on a substantiated conviction that they are appropriate in terms of the needs and aspirations of the area.	The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.		These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.		

Response_Number:	162	Persons_Name:	Gregory Gray Associates	Representing_Who?:	The Garden Centre Group
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Q7- Do you agree that there is a need for the preferred policy approach? The preferred policy approach which sets out the strategic flood risk in South East Lincolnshire is considered to be realistic and necessary. In order to meet the need for sustainable development in an area where a high proportion of the land is at risk of flooding, it is considered inappropriate to rely wholly on the generic advice contained in the NPPF.	Support noted.		Support - No change to the approach is required.		

Response_Number:	163	Persons_Name:	Gregory Gray Associates	Representing_Who?:	The Garden Centre Group
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Q8 - Does the preferred policy approach 'Strategic Approach to Flood Risk' help you to understand how flood risk issues will impact on planning decisions? The wording of the preferred policy approach is unclear and the requirement to 'show why the need for the development is exceptional' appears unsubstantiated. Previously developed sites such as that occupied by my client offer the opportunity to achieve a redevelopment which, as a result of a reduction in the total amount of floor space on the site and appropriate flood mitigation measures, could result in a reduced flood risk on the site and in the surrounding area. This could be demonstrated by means of a site specific FRA.</p> <p>In such an instance, there would not necessarily be an 'exceptional need' for the development that would justify its construction but it might be desirable in flooding terms by providing a sustainable form of development which could reduce the risk of flooding on the site and elsewhere. The desirability of such a development could constitute the 'wider sustainability benefits to the community' required by the Exception Test set out in national policy guidance. The preferred policy approach should allow for such an eventuality.</p>	<p>This Policy has been revised. The Objector raises site specific considerations that potentially favour a particular site. The Policy is not a means to consider specific sites in isolation as other sites may be sequentially preferable or might meet the Exceptions Test better.</p>		<p>Objection - No change to the policy is recommended.</p>		

Response_Number: 164

Persons_Name: Gregory Gray Associates

Representing_Who?: The Garden Centre Group

Respondents_Comments:

Q9 – What changes, if any, to the preferred policy approach or supporting text would you suggest?
The preferred policy approach should be reworded to include the provision “In instances where development is proposed on previously developed land, there will be no requirement to show an essential need for the development where it can be demonstrated, by means of a site specific FRA, that the proposed development will not be at risk from flooding and offers material sustainability benefits in terms of reduced flood risk to the wider community”.

Officer_Response:

This Policy has been revised. The Objector raises site specific considerations that potentially favour particular site types. Previously developed land is not an Exceptions Test consideration

Officer_Recommendation:

Objection - No change to the Policy is recommended.

Response_Number:	165	Persons_Name:	Gregory Gray Associates	Representing_Who?:	The Garden Centre Group
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Q 10 – Do you agree with the identification and appraisal of reasonable and unreasonable options? The assessment of the reasonable and unreasonable options for the provision of housing is considered to be overly conservative given the Government’s drive for economic growth and stated aim to ‘boost significantly the supply of housing’ as set out in the NPPF.</p> <p>The preferred option (Option A) appears to have been chosen on the basis purely that it is ‘deliverable when compared with historic building rates’ and yet it appears to propose housing numbers significantly below both ONS projections, the figures from the RSS 2009 and indeed the building rate between 2001 and 2010 identified in Appendix 11 of the Plan.</p> <p>It is not considered appropriate to base the reasonableness of housing figures purely on their deliverability in light of historic building rates. The emerging Plan is being formulated within a new policy climate provided by the NPPF. This is substantially more ‘Pro-Growth’ than the previous regime and sees the provision of a greater supply of appropriately located housing as fundamental to achieving economic growth.</p>	<p>The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.</p>		<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>		

Response_Number:	166	Persons_Name:	Gregory Gray Associates	Representing_Who?:	The Garden Centre Group
Respondents_Comments:	<p>Q11 – Does the preferred policy approach ‘Provision for Housing’ feature housing figures that are about right, too high or too low? It is considered that the proposed housing figure is too low given that the provision of an appropriate supply of housing is recognised as essential to achieving the sustainable development of an area. Accordingly, it is requested that the proposed housing figures are revised upwards and that, as a minimum, Option B which provides for a total of 810 dpa within South East Lincolnshire, is adopted.</p>	Officer_Response:	<p>The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.</p>		
		Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>		

Response_Number:	167	Persons_Name:	Gregory Gray Associates	Representing_Who?:	The Garden Centre Group
Respondents_Comments:	<p>Q12 and Q13 – Do you agree with the identification and appraisal of reasonable and unreasonable options for the provision of new housing in ROY Zones and the preferred policy approach which limits the number of new homes in this, the severest flood hazard zone. The identification and appraisal of reasonable and unreasonable options for new housing in the ROY zones is accepted. It is considered that some new housing will be required in these areas in order to prevent population lost and economic decline. However, it is considered that there should be a limit on the number of new homes proportionate to existing population figures for these areas.</p>	Officer_Response:	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22. 'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.' These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>		
		Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>		

Response_Number:	176	Persons_Name:	Angela Atkinson	Representing_Who?:	Marine Management Organisation
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
There are few specific references to the coast or marine environment/activities within the strategic policies. For example we believe that within SP8 'climate change and flood risk' reference could be made to coastal flooding.	Many coastal activities are not material considerations of the Local Plan as they do not constitute development/activities over which the planning legislation has any powers. Coastal flooding is a material consideration but only as it affects development that is within planning powers. The Local Plan is considered to address these issues adequately.		Objection - No change to the plan is recommended.		

Response_Number:	181	Persons_Name:	Angela Atkinson	Representing_Who?:	Marine Management Organisation
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
As part of the discussion of the East Midlands Regional Plan the need for a coastal strategy is mentioned. It is unclear if this is still going ahead and whether the associated coastal study is to be used to influence this current local plan. If possible, clarification on this matter would be welcomed.	Comments noted. The Coastal Strategy (Study) has been given similar status to that which might have been given it had it been taken forward in informing the review of the RSS, i.e. material evidence to be assessed in deciding policy approaches.		Objection - No change to the approach is required.		

Response_Number: 234

Persons_Name: Woods Hardwick Planning

Representing_Who?: Wheatley PLC

Respondents_Comments:

The approach to identifying the quantity of additional housing is clearly set out within the NPPF. At the heart of this document is a presumption in favour of sustainable development, 'a golden thread running through both plan-making and decision-taking.'

With regard to plan-making this is stated as meaning the following:

- Local planning authorities should positively seek opportunities to meet the development needs of the area; and

- Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.

The NPPF does not specifically define what 'objectively assessed housing needs' means but it does clearly offer guidance on using a proportionate evidence base. This includes:

- The assessment is up-to-date;

- The preparation of a Strategic Housing Market Assessment which:

meets household and population projections, taking account of migration and demographic change; addresses the need for all types of housing; and caters for demand.

- Prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about suitability of land to meet the need for housing over the plan period.

It is worth noting an on-going issue relating to a Core Strategy that is currently going through the examination process. The West Northamptonshire Joint Core Strategy Examination Hearings commenced in Mid April 2013 and ran through to early May 2013. In view of the revocation of the East Midlands Regional Strategy and representations made at the Hearing

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

regarding updated population projections, the Inspector called a halt to proceedings in light of concerns about whether the West Northamptonshire Joint Planning Unit had objectively assessed housing need.

There are two key lessons to be drawn from this particular situation, which provide clear guidance moving forward:

- The importance of meeting the test of ‘objectively assessed needs’. This reinforces the status of the NPPF as the primary basis for guidance in the plan-making process;
- The Inspector, through the Programme Officer, stated that the assessment:

‘...will take into account both the latest Office of National Statistics (ONS) household projections and the early 2011 Census results, including by reference to the “How Many Homes/What Homes Where Toolkit”, recently launched by Lord Taylor at the House of Lords.’

This example, as highlighted in the penultimate bullet point above, clearly places the NPPF as the principal guidance document for the preparation of a development plan and the NPPF at paragraph 159 offers a clear steer as to what the evidence base should comprise to objectively assess housing need. The key point is that the evidence base for establishing need should be comprehensive and up-to-date.

The approach of the Joint Planning Committee

The Draft Strategy sets out a number of documents which it considers forms the evidence base for identifying the housing need for the Plan Area. These comprise:

- The East Midlands Regional Strategy;
- Strategic Housing Market Assessments – Coastal

Lincolnshire which covers Boston Borough (2012) and Peterborough Sub Region which covers South Holland (Update 2010);

- Demographic Projections for Coastal Districts in Lincolnshire 2012;
- South East Lincolnshire Strategic Housing Land Availability Assessment 2012; and
- Housing Completion data for South East Lincolnshire.

In addition to the above documents, the Plan quite rightly has regard to flood risk.

In light of this evidence base, the Plan sets out what are considered to be reasonable and unreasonable policy options in seeking to identify the quantity of additional housing to be provided over the plan period to 2031.

The reasonable options identified are:

- Option A – Setting targets in accordance with the NPPF, using objectively-assessed housing needs set out in the respective SHMA's; and
- Option B – Use the 'Annual (housing) Apportionment from 2006' contained in the East Midlands Regional Plan and extend this to 2031.

The unreasonable policy options identified are:

- Option C – Use the 'Migration-Led A' scenario set out in the Demographic Projections for Coastal Districts in Lincolnshire to inform housing targets for South East Lincolnshire.
- Option D – Use the 'Migration-Led B' scenario set out in the Demographic Projections for Coastal Districts in Lincolnshire to inform housing targets for South East Lincolnshire.
- Option E – Zero population growth.

These representations disagree with the both the reasonable and unreasonable policy options as set out. Dealing with them in turn:

Option A

This option is considered acceptable in so far as it goes. As clearly stated within the NPPF and highlighted by the West Northants example, the evidence base that informs housing need will comprise a SHMA(s) but it is not limited to that.

The Inspector in the West Northamptonshire case, referred specifically to recent good guidance centred around updated census statistics. Therefore, whilst on the face of it, Option A is in accordance with the NPPF, it is not considered to provide a sufficiently robust basis for quantifying the housing need i.e. it does not take account of the latest ONS figures and projections, which are utilised in Options C and D.

Option A quantifies the need as being 696 per annum over the plan period, totalling 13,920 over the Plan Period. This is split into 226 per annum in Boston Borough and 470 per annum for South Holland.

The Preferred Option for the Plan is Option A and the justification for this is that it is considered deliverable when compared to historic building rates. The historic build rates are based on an average taken over the period 1976-2012, which are as follows for the two areas:

- Boston Borough – 263 dwellings per annum;
- South Holland District – 414 dwellings per annum.

It is not considered to constitute sound planning for a number of reasons.

First and foremost it is not appropriate to justify future growth on the basis of past trends. There is a debate to be had with regard to the total annual requirement identified. However, to justify this on the basis of previous completions is not appropriate. The average

completions set out above are taken over a period of 26 years, during which the United Kingdom has been subject to a number of economic recessions.

The Coalition Government, since taking office, has consistently sought to streamline and simplify the planning system as it places this central to implementing the recovery and growth of the country's economy. In that context the Coalition's key messages include securing a step change in delivery and getting Britain building again.

In light of the Coalition's approach and the overall thrust of the NPPF, it is not appropriate to plan for the future, based on trends from the past.

Option B

Events have in all likelihood overtaken this option now, with the East Midlands Regional Strategy now having been abolished. It therefore forms no basis for establishing housing need. Notwithstanding this, the evidence base that supported the annual apportionment from 2006 would now be considered to be out of date and therefore does not comprise a robust evidence base on which to carry out an objective assessment of housing need.

In light of the abolition of the Regional Strategy and the evidence base that supported the Plan, Option B is submitted as being an unreasonable option.

Option C

This option provides a 'Migration-Led' 'trend' scenario taking account of evidence from mid-year estimates released by the Office of National Statistics published in November 2011. These are set out in Demographic Projections for Coastal Districts in Lincolnshire. The document sets out official and indicative mid-year estimates for Boston and South Holland in 2010 and

they are as follows:



Official MYE Indicative MYE

Boston Borough 59,042 63,098

South Holland 84,561 87,442

Since the production of these figures, ONS published on the 30th May 2013 updated 2011 mid-year population estimates which are 64,615 for Boston and 88,390 for South Holland. These provide credence to the indicative MYE estimates set out above and suggest that previous work has under estimated population growth in these areas.

The Demographic Projections for Coastal Districts in Lincolnshire report states that ONS has an on-going programme of 'improvement' to its estimation technologies to ensure that accurate data on immigration and emigration is used in its mid-year estimates.

In the context of the requirements of the NPPF, it is submitted that the latest figures published by ONS should form an important part of the evidence base for the assessment of the housing need over the plan period. Currently, the need proposed to be planned for is based on the latest SHMA. The use of an up-to-date SHMA is supported by the NPPF but recent advice and approach clearly shows that the use of ONS figures should also form a key part of carrying out an objectively based assessment of housing need.

Option C should therefore not be rejected as an unreasonable option.

Option D

The rationale behind this scenario is similar to Option C, except that it constrains population growth. The comments made in respect of Option C apply equally

here in terms of up-to-date evidence and support the fact that option D should not be rejected as an unreasonable option.

Option E

This option of zero growth is unreasonable as it does not plan to meet the objectively based assessment of need.

Response_Number:	235	Persons_Name:	Woods Hardwick Planning	Representing_Who?:	Wheatley PLC
Respondents_Comments:	<p>The NPPF clearly states that local plans should meet objectively assessed needs and it goes on to say that this should be established by using an evidence base that includes an up-to-date SHMA. Recent advice and practice in plan making has also identified the use of up-to-date ONS figures as forming a key part of that evidence base.</p> <p>The preferred policy approach bases the housing figures on the recent SHMA's. It does not consider that basing housing need on more recent population/household estimates is a reasonable option. Those figures, whether you take the 2011 figures or the latest 2013 figures, clearly show that a higher level of housing is required over the plan period. The use of the most up-to-date information should inform the assessment of need.</p> <p>The plan rejects the population/household estimates based assessments but does not appear to offer any substantive reason why.</p> <p>Based on clear guidance within the NPPF regarding the undertaking of an objectively based assessment of need, it is submitted that additional housing needs to be identified to meet a need clearly evidenced by up-to-date population growth figures. The figure is therefore too low.</p>	Officer_Response:	<p>The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.</p>	Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>

Response_Number:	257	Persons_Name:	Richard Burrell	Representing_Who?:	Himself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The road and area in which I reside is known and has been a flood hazard. The area has flooded quite often over many years. As recently as 2 years ago our residential road was flooded causing much damage and inconvenience. My own garden frequently floods in winter.	Comments noted. Whilst the respondee highlights flooding as a issue no comments are made which might suggest a different approach in the Preferred Options Document. It should be noted, however, that a commitment of planning authorities (and Local Plans) is to reduce flood risk through assessment of the most up to date information and through control of development as appropriate.		Objection - No change to the approach is required.		

Response_Number:	278	Persons_Name:	M J Smith	Representing_Who?:	Himself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Not enough weight is given to sea defence improvements to defences seem to be feeble to date. The vulnerability of high output multi cropping, land that is necessary to be retained to feed a growing population has not been made in strong enough terms.	Sea defence is a consideration of the plan in respect of the assessment of flood risk. Improvements to sea defences is not a direct responsibility of the Local Plan.		Representations beyond the remit of the Local Plan		

Response_Number: 281

Persons_Name: Antony Aspbury Associates

Representing_Who?: Lincolnshire Diocese

Respondents_Comments:

AAA have concerns that the selection of Option A as the preferred option for the provision of overall housing across South East Lincolnshire reflects an over cautionary approach to providing housing growth for the respective Districts. It is disturbing that recent demographic studies commissioned on behalf of the local authorities that factor in migration trends are discounted as unreasonable options because they generate housing levels deemed undeliverable compared against the benchmark of historical housing completions. The NPPF requires authorities to meet the full objectively assessed housing needs for their areas using the most up to date evidence and so a constraint- led approach based on historical performance will not boost significantly the supply of housing if previous housing completions do not meet all future housing needs established through up to date forecasting. In these circumstances the LPA's should be examining the opportunities available to address constraints to housing delivery going forward rather than looking back to historical performance as a benchmark for the future provision.

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:	282	Persons_Name:	Antony Aspbury Associates	Representing_Who?:	Lincolnshire Diocese
Respondents_Comments:	On the basis of the response to Q10 above, we consider that the overall provision for housing figure is probably too low. With due respect to the constraints of flood risk within South East Lincolnshire, the starting figure for housing provision should be higher than that currently proposed when considering projected population growth and in-migration trends.	Officer_Response:	The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.	Officer_Recommendation:	These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:	283	Persons_Name:	Antony Aspbury Associates	Representing_Who?:	Lincolnshire Diocese
Respondents_Comments:	We acknowledge and support the approach towards the provision of additional housing within the identified ROY (Red-Orange-Yellow) flood risk zones. Additional, sustainable housing growth is clearly necessary within the extensive areas of South East Lincolnshire that are at flood risk, yet a capped provision in these areas combined with a new approach to greater and wider distribution to areas outside the ROY must be the positive direction for planning for growth in the future.	Officer_Response:	Support noted.	Officer_Recommendation:	These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:	284	Persons_Name:	Antony Aspbury Associates	Representing_Who?:	Lincolnshire Diocese
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
We acknowledge and support the approach towards the provision of additional housing within the identified ROY (Red-Orange-Yellow) flood risk zones. Additional, sustainable housing growth is clearly necessary within the extensive areas of South East Lincolnshire that are at flood risk, yet a capped provision in these areas combined with a new approach to greater and wider distribution to areas outside the ROY must be the positive direction for planning for growth in the future.	Support noted.		These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.		

Response_Number:	298	Persons_Name:	Peacock & Smith	Representing_Who?:	Mr R Hardy
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Our client also supports the preferred approach to housing provision, which sets out a requirement for an additional 4,520 dwellings to be provided in Boston Borough over the Plan period to 2031. This approach reflects the anticipated population growth in the Borough and seeks to provide additional housing provision to meet the needs of the growing population.	Support noted.		These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.		

Response_Number: 309

Persons_Name: Mr Mark Johnson

Representing_Who?: Assura Properties Limited

Respondents_Comments:

We consider the housing provision in Boston should be higher. We disagree with the Council's own approach of planning for a lower housing target of Option A, based on future economic uncertainty (paragraph 4.15.2). This goes against the ethos of the National Planning Policy Framework('the Framework'), to plan for growth. Option A allows for an annual target of 226 dwellings in Boston which is based on the SHMA. The SHMA uses 2008 based household projections. There is no reference to the latest 2011 based household projections which for Boston between 2011 and 2021 equate to 500 households per annum. This is considerably higher than the preferred option for an annual requirement of 226 dwellings in Boston. Given the sub-regional centre status of Boston we would recommend a higher annual housing figure is taken forward which more positively plans for growth. Paragraph 47 of the Framework requires local planning authorities to boost significantly the supply of housing – Paragraph 50 requires local planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Paragraph 158 and 159 clearly set out the requirements for establishing a clear understanding of housing needs in their area. This includes using up-to-date and relevant evidence including housing and population projections. We suggest reference should be made to the most up to date evidence of housing need in the 2011 based household projections (April 2013).

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:	310	Persons_Name:	Mr Mark Johnson	Representing_Who?:	Assura Properties Limited
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>We consider the housing provision in Boston should be higher. We disagree with the Council’s own approach of planning for a lower housing target of Option A, based on future economic uncertainty (paragraph 4.15.2). This goes against the ethos of the National Planning Policy Framework(‘the Framework’), to plan for growth. Option A allows for an annual target of 226 dwellings in Boston which is based on the SHMA. The SHMA uses 2008 based household projections. There is no reference to the latest 2011 based household projections which for Boston between 2011 and 2021 equate to 500 households per annum. This is considerably higher than the preferred option for an annual requirement of 226 dwellings in Boston. Given the sub-regional centre status of Boston we would recommend a higher annual housing figure is taken forward which more positively plans for growth. Paragraph 47 of the Framework requires local planning authorities to boost significantly the supply of housing – Paragraph 50 requires local planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Paragraph 158 and 159 clearly set out the requirements for establishing a clear understanding of housing needs in their area. This includes using up-to-date and relevant evidence including housing and population projections. We suggest reference should be made to the most up to date evidence of housing need in the 2011 based household projections (April 2013).</p>	<p>The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.</p>		<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>		

Response_Number: 319

Persons_Name: Mr Neil Osborn

Representing_Who?: Larkfleet Homes

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

We SUPPORT the recitation of national policy and obligations as set out at paragraphs 4.0.1 – 4.1.12. This sets an appropriate framework for consideration of the issues. Reference to the East Midlands Regional Plan is wholly inappropriate unless expressed in the past tense and where it is made clear that it is a matter of historic record. It is for the Joint Local Authorities to establish their own strategy based upon evidence which can be justified under examination in terms of a strategy to address potential flood protection measures in relation to the scale and distribution of growth that is needed to sustain a viable community.

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Overall however whilst it is appropriate to set out a thumbnail picture of the evidence base we are significantly concerned that some of the data appears either out of date or not to have been specifically researched for the preparation of the Local Plan. However we welcome the acknowledgement at paragraph 4.3.1 that "In the proposed absence of a regionally-imposed target, there is a need to identify a requirement for housing growth in South East Lincolnshire up to 2031. Given that Boston Borough and South Holland District Councils retain their separate roles as local planning authorities for development management purposes, this requirement needs to be based on separate specified targets for Boston Borough and South Holland District"

Reference to the Duty to Co-operate might also be spelt out so that there is a clear understanding that, whilst individually responsible, the Authorities will work together to achieve an appropriate balance of housing distribution having regard to all material considerations.

Specifically in relation to the assessment of housing need, we note the contents of paragraphs 4.2.10 – 4.2.12 under the heading Demographic Projections for

Coastal Districts in Lincolnshire and that analytical work was completed in March 2012. The Joint authorities will be aware that subsequent population projections have been published by the ONS and that before proceeding further the baseline data on household projections and housing demand should be fully revised and updated.

We note and suggest that the Joint Authorities reflect upon the recognition that some settlements whilst nominally at risk of flood have, in practical terms, a low potential flood risk – in particular we welcome reference to Kirton and Fishtoft as such locations at paragraph 4.2.13 and consider that the housing development strategy should have regard to such considerations.

Overall, with regard to the approach to flood risk we broadly SUPPORT Option A as we acknowledge the specific constraints and issues as they affect the Joint Planning Area. However the issue of flood risk does not in our view abrogate responsibility to the existing and prospective population to ensure that adequate economic and housing opportunities are provided and that the obligations of other national planning policies are met in full. It is therefore for the Local Plan to demonstrate that Option A will have only a neutral impact upon economic development and housing considerations.

Response_Number: 320

Persons_Name: Mr Neil Osborn

Representing_Who?: Larkfleet Homes

Respondents_Comments:

We OBJECT to preferred Policy Option A for housing provision.

Policy Options A and B are not reasonable policy options as they are based on only partial evidence of need. Whilst the SHMA provides a picture of the housing market as it presently affects the Joint Authority areas this is now 2010 based and out of date. In particular it references policies in the East Midlands Regional Plan now revoked and specifically covers changes in the housing market in the most difficult period 2007-2010. It is based upon ONS 2008-based sub-national population projections which have now been replaced. It is explicitly not a tool for policy setting but merely a part of the evidence base. The SHMA in fact concludes:

“Overall, the levels of both demand and need in the district are significant and the findings of the SHMA update can support the local authority to develop policies which will assist them in meeting housing needs and demands both now and into the future.”

Demonstrably a SHMA cannot and is not intended alone to form the basis of determining the scale of future housing provision, and Option A fails to recognise the requirement of Paragraph 50 of the Framework to plan on the basis of a range of policy demographic, market and social considerations.

Policy Option B is also wholly inappropriate. The East Midlands Plan – which was based on even earlier demographic data has now been revoked. Whilst it may play a role in providing an assessment of the scale of housing requirements for the purposes of appeals until it is formally replaced by more up to date information contained in an adopted Local Plan it is not a suitable basis for preparing that Local Plan without rigorous testing.

Options C and D must be the starting point for housing

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

policy and it is insufficient merely to say that such provision levels are undeliverable. The level of need which they reflect has regard to consideration of wider sub-regional issues and unless it can be demonstrated that the housing needs of the Joint Local Plan area are being accommodated elsewhere the provisions of the Framework Paragraphs 14 and 47 requiring Plans to meet in full objectively assessed need, which proactively drive economic growth and which boost significantly the supply of housing must prevail.

¶ We therefore strongly OBJECT to Table 4.7 and paragraphs 4.14.1-4.14.13 as they do not provide a rigorous assessment of impacts and provide no rational basis for assessing choice or the outcomes of choice of strategy. The failure to do so and the failure of the Plan to properly assess housing need, based on proper evidence, will render the Plan unsound.

¶ We consequently OBJECT to the preferred option for delivery. It follows that the failure to rigorously assess need and to plan accordingly for its provision renders the Local Plan unsound and that its strategy for delivery – which appears to be little more than an expectation that if a certain number of dwellings have been constructed in the past it must be possible for a similar number to be constructed in the future is a wholly inadequate approach to development planning. It is an abrogation of the requirement under Paragraph 47 of the Framework to boost significantly the supply of housing land and it is a failure of the Local Plan to deliver national planning objectives including those pertaining to development in rural areas.

¶ In principle Larkfleet Homes SUPPORT the distribution of development set separate limits on the number of additional dwellings provided in the Red, Orange and Yellow flood-hazard zones (the ROY zones) for Boston Borough and South Holland District based on the approach outlined in Principal 1 in Planning for Coastal Flood Risk in South East Lincolnshire. It is considered that such differentiation is appropriate in seeking to

address the specific flood risk issues that are identified. However that should not rule out development where it is needed and where it can be adequately defended. We therefore note the Strategic Approach to Flood Risk as set out at paragraph 4.24 but OBJECT to the absence of any clear evidence within this Plan as to the actual capacity of areas around key identified settlement which are within the different ROY categories and how this can be reliably used to inform the scale of development to be allocated..

We OBJECT to the Provision for Housing for the reasons set out above.

Response_Number:	543	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
It is agreed that there is a need for a flood risk policy.	Support noted.		Support - No change to the approach is required.		

Response_Number:	544	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The DPD explains the policy context in detail and sets out a reasonable approach.	Support noted.		Support - No change to the approach is required.		

Response_Number:	545	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
No changes are suggested.	Support noted.		Support - No change to the approach is required.		

Response_Number:	546	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The identification and appraisal of reasonable and unreasonable options would appear acceptable for the South Holland District.	Support noted.		Support - No change to the approach is required.		

Response_Number:	547	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The preferred provision for housing policy approach for South Holland appears correct based on the historic build rate.	Support noted.		Support - No change to the approach is required.		

Response_Number:	548	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
We agree with an element of control of the number of homes to be built in the severest flood hazard zones		Support noted.		Support - No change to the approach is required.	

Response_Number:	549	Persons_Name:	Mr R Doughty	Representing_Who?:	R S Earl
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No changes are suggested.		Support noted.		Support - No change to the approach is required.	

Response_Number:	595	Persons_Name:	Mr R Doughty	Representing_Who?:	A W Tindall
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
It is agreed that there is a need for a flood risk policy.		Support noted.		Support - No change to the approach is required.	

Response_Number:	596	Persons_Name:	Mr R Doughty	Representing_Who?:	A W Tindall
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
The DPD explains the policy context in detail and sets out a reasonable approach.		Support noted.		Support - No change to the approach is required.	

Response_Number:	597	Persons_Name:	Mr R Doughty	Representing_Who?:	A W Tindall
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No changes are suggested.		Support noted.		Support - No change to the approach is required.	

Response_Number:	598	Persons_Name:	Mr R Doughty	Representing_Who?:	A W Tindall
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
The identification and appraisal of reasonable and unreasonable options would appear acceptable for the South Holland District.		Support noted.		Support - No change to the approach is required.	

Response_Number:	599	Persons_Name:	Mr R Doughty	Representing_Who?:	A W Tindall
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The preferred provision for housing policy approach for South Holland appears correct based on the historic build rate.	Support noted.		Support - No change to the approach is required.		

Response_Number:	600	Persons_Name:	Mr R Doughty	Representing_Who?:	A W Tindall
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
We agree with an element of control of the number of homes to be built in the severest flood hazard zones	Support noted.		Support - No change to the approach is required.		

Response_Number: 601

Persons_Name: Mr R Doughty

Representing_Who?: A W Tindall

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

No changes are suggested.

Support noted.

Support - No change to the approach is required.

Response_Number: 644

Persons_Name: Graham Warren Ltd

Representing_Who?: Broadgate Homes Ltd

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

The overarching Government requirement, in the context of the presumption in favour of development, is to boost significantly, the supply of housing (NPPF Para 47). The Plan recites the NPPF in some detail in this respect and its provisions are not repeated here, save to say that crucially, Local Plans should:

- Indicate broad locations for strategic development on a key diagram and land use designations on a proposals map; and
- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development, where appropriate.

The councils have undertaken a Strategic Housing Market Assessment (2012).

In summary and bringing together the results from the study and in particular, the outputs of the housing needs and housing market models, it is suggested that between 58% and 100% of additional housing would need to be affordable if all needs are to be met. In reality, the private rented sector will continue to be used to meet some of this need, whilst targets will be constrained by the viability of individual sites.

It will therefore be for the council to take a view on realistic targets based on economic viability, as well as the level of housing need. In the affordable sector, the data suggest that between 23% and 31% of additional housing should be intermediate, with a particular focus on intermediate rent for households with limited levels of capital. In the market sector, it is concluded that around 69% of additional homes should be larger (3 and 4+ bedroom) units, with the opposite being true of affordable housing (between 63% and 76% smaller (1

Support noted.

Support - No change to the approach is required.

and 2 bedroom) units).

Overall, the levels of both demand and need in the District are significant:

- Growth in household numbers derived from Office for National Statistics (ONS) 2008 based population projections, results in a requirement for 470 additional dpa, with a recommendation that 35% of the dwellings should be affordable housing;
- Growth based on East Midlands Regional Plan figures, results in a requirement for 540 dpa, with a recommendations that 35% of the dwellings should be affordable housing; and
- Growth based on the abandoned 'Revised Draft East Midlands Regional Plan (Partial Review) housing provision figures, results in a requirement for 705 dpa, with a recommendation that 31% of the dwellings should be affordable housing.

The Plan states that it is essential to identify a dwelling target aimed at meeting the housing needs of S E Lincolnshire, which specifies separate targets for Boston Borough and South Holland District. Individual targets are necessary, in order to enable an individual five year housing supply for each Local Authority area.

Five policy options have been considered in determining the appropriate level of housing in the Plan area. These are

Reasonable Options:

- A. Setting targets in accordance with the NPPF and to use objectively assessed housing needs, set out in the respective SHMA's, covering both Local Authorities.
- B. To use the annual housing apportionment contained in the former Regional Plan and to extend it up to 2031.

Unreasonable Options

- C. Use the migration led A scenario in the "Demographic Projections for Coastal Districts in Lincolnshire " to inform housing targets for S E

Lincolnshire.

D. Use the migration led B scenario set out in the “Demographic Projections for Coastal Districts in Lincolnshire “.

E. The zero growth option

The five different options for housing provision are set out in Table 1 below. However, when the earlier recorded historic rate of completions is considered against them, it is clear that Options C and D would appear to be undeliverable and therefore unreasonable, based on the experience of the last 35 years or so. Option E is deemed unreasonable as it does not meet the objectively assessed housing need for the area and is therefore, contrary to the provisions of the NPPF.

Table 1 : Policy Options for determining a housing target for South east Lincolnshire

Dwellings per annum (2011-2031) Historic Rate of Completions

Option A	Option B	Option C	Option D	Option E
Boston Borough	226	270	535	207
South Holland District	470	540	836	271
Total for S E Lincolnshire	696	810	1,236	1,247

The delivery of both options will be guided by the framework provided by the Spatial Strategy, other housing related policies, the Site Allocations DPD where appropriate, and the development management process. Most significant housing proposals will require appropriate supporting infrastructure, which will be identified through the Infrastructure Delivery Plan (IDP).

Given the historic rate of housing delivery in South East Lincolnshire and the uncertainty surrounding the economic situation, looking ahead over the next few years at least, it is considered that the lower housing

target represented by Option A, is the most deliverable. The delivery of overall targets for additional dwellings will be monitored through an annual 'Monitoring Report'.

Option A is the preferred option because it is considered deliverable, when compared with historic building rates. If a higher growth target were to be identified, (e.g. Option B), there is an increased likelihood of the Local Planning Authorities being unable to demonstrate a five year supply of deliverable housing sites and consequent fears about 'unplanned growth'.

Having regard to the evidence base, in conjunction with past build rates and flood risk issues, Broadgate Homes support the overall level of housing provision in the Plan to 2031. However, if market conditions dictate, given the identified SHLAA capacity, then the figures set out in Table 2 below should be regarded and stated as minima.

Table 2 – Proposed dwelling provision Lincolnshire 2011-2031

Local Authority Area	Annual Apportionment From 2011	Total Housing Provision 2011-2031	Maximum number of dwellings provided in areas categorised as Red, Orange or Yellow flood hazard zones (as defined in the Lincolnshire Coastal Study)
Boston Borough	226	4,520	3,600
South Holland District	70	9,400	1,200
South East Lincolnshire	96	13,920	4,800

Response_Number:	660	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	<p>Too much emphasis is given to flooding, the likelihood of which is only a probability and by no means a certainty. Rather than seeing this as something negative, greater emphasis should be made of designing development that can withstand and mitigate flooding as well. Although areas of greatest flood risk should be avoided, the improved flood defences currently being built in Boston must be taken into consideration when designating land for possible development in the long term future as well as up to date predictions regarding climate change. Limits on numbers of houses must not be so rigidly adhered to so as to cause a shortage of housing at some later stage but should be seen as guidelines.</p>	Officer_Response:	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	661	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	<p>It is good that recognition is given to the sub-regional status of Boston and also the location of choice for a large number of people to live. The policy should encourage developers to seek house designs that will enable redundant buildings and previously developed land that will enable more people to live within the town.</p>	Officer_Response:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	662	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	Although any new development will cause some increase in greenhouse gas emissions, the actual location of the development is irrelevant as emissions will be the same wherever the houses are built.	Officer_Response:	Comments noted. It is not agreed that where development is located is irrelevant when considering carbon emissions. For example, more isolated locations where more travel to services is needed will generate greater carbon emissions. They are also generally less sustainable locations in terms of other service provision (e.g. bin emptying and supply maintenance) and are less likely to benefit community scale benefits and potentially reduce the efficiency of such benefits for the community at large elsewhere.	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:	663	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	I note the stated difference between the housing markets of Boston and Spalding and agree that it is questionable as to whether housing located in Spalding would meet the needs of Boston.	Officer_Response:	Support noted.	Officer_Recommendation:	Support - No change to the approach is required.

Response_Number:	664	Persons_Name:	Cllr A Austin	Representing_Who?:	Herself
Respondents_Comments:	<p>Although some contribution towards infrastructure may be obtained from new housing development, it will be difficult to attract interest in development where it is needed in some places without improved infrastructure being in place first. Vital future development should not be penalized or deterred by the failure in the past by utility companies and other agencies to plan ahead and to upgrade their services.</p>	Officer_Response:	<p>Infrastructure in it's entirety will be comprehensively addressed through the Infrastructure Delivery Plan (IDP), which will inform the next stage of the plan-making process, and will accompany the Submission Version of the DPD.</p>	Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan following Whole Plan Viability and Infrastructure Delivery Plan work.</p>

Response_Number:	689	Persons_Name:	Tom Gilbert - Wooldridge	Representing_Who?:	English Heritage
Respondents_Comments:	<p>We do not have a view on the exact numbers of houses to be delivered across South East Lincolnshire, but the identification of specific sites will need to avoid harming the historic environment. We note the issues relating to flood risk and the need to limit the number of houses within those parts of the plan area of greatest risk. This has particular implications for the town of Boston given its flood risk status and raises questions in terms of how it might develop in the future (mindful of its role and function as a sub-regional centre and the need for investment and regeneration). Again, the identification of specific sites within and around the town of Boston will need to conserve the historic environment (both designated and undesignated assets).</p>	Officer_Response:	<p>Comments noted. Site-specific considerations such as these will be addressed later in the plan-making process, specifically through the Site Allocations DPD.</p>	Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>

Response_Number:

725

Persons_Name:

D D Wilson

Representing_Who?:

Himself and Clients

Respondents_Comments:

Chapter 4. Housing Growth and Flood Risk
 Attached is a map of the eastern part of the District apparently at risk of long term flooding from the sea. (Database 2115). It comprises very approximately 9000 hectares of some of the best arable land in Europe. This land has a current market value of between very approximately one hundred and eighty million pounds and two hundred and twenty five million pounds. I have no idea what the annual farm-gate value of the vital crops produced on this land, might be, but I would not be surprised to learn it exceeds a million pounds per annum with an end-user value of perhaps treble this figure. Extend this area which is also considered to be at a long-term risk of flooding from the sea or tidal rivers, to include Holbeach Marsh, Moulton Marsh, Kirton Marsh and Frampton Marsh; plus the Parishes of Fishtoft/Freiston/Butterwick/Leverton/Wrangle etc., and we now have a huge area of highly productive arable land of national food security importance. It is inconceivable that a large part of this area will be allowed to be inundated by sea water, thereby rendering the land incapable of production, not to mention major damage to properties and lives put at risk. If the Environment Agency has no faith in Central Government providing suitable long-term flood protection as seems to be the case, then the South-East Lincolnshire Joint Strategic Committee must start work now on this requirement. For example, by creating an aptly named "sinking fund" which will enable the Committee in say fifty years time to raise sea banks and carry out such works (e.g.. flood barriers etc.) sufficient to eliminate the risk of flooding from rising sea levels etc. If the Committee is not up to the job then perhaps the requirement should be handed to a task force created from within the Internal Drainage

Officer_Response:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Officer_Recommendation:

Objection - No change to the approach is required.

Boards. The money would be raised through additional Council Tax/Business Rates and additional Drainage Rates. Say £250,000 per annum over the next fifty years. May be an additional 1% per annum surcharge on all Council Tax and Business Rate bills plus say £5. per annum per hectare. Otherwise, the suggestion is the residents at Long Sutton/Sutton Bridge/Boston and all the marshland villages, etc. will drown in their beds on 1st January 2015. Its time to re-read the wonderful poem by the Boston poetess, Jean Ingelow (The High Tide on the Coast of Lincolnshire!) Perhaps Central Government could be persuaded to revisit the benefits of a Wash Barrage which could include fresh water and tidal energy.

Long Sutton had a population of 7,260 in 2011 and Holbeach a population of 7,346. It is proposed Long Sutton will receive a preference Option 'A' allocation of 150 dwellings. It is proposed Holbeach will receive a preference Option 'A' allocation of 1,000 dwellings. Long Sutton has one or two amenities not available in Holbeach, and Holbeach has one or two amenities not available in Long Sutton. Broadly speaking, the two Towns have the same amenities. Long Sutton does, however, have land suitable for development which is much closer to amenities than is the case in Holbeach. The sensible approach of a Sequential Search for land accessible to amenities seems to have died a death. Yes, Long Sutton is apparently falls within ROY zones. However, it is proposed to build 2,900 dwellings in ROY zones within Boston, up to 400 in the village of Kirton, up to 300 in the service villages of Boston Borough and up to 900 in Holbeach, some or all of which may also fall in ROY zones. The approach of restricting development in Long Sutton because it falls within ROY zones is illogical. The suggestion the provision of new homes in Long Sutton should also be curtailed because not many have been built in the Town during the last ten years or so is disingenuous. Not many have been built during this period because the Local Authority

proposed the current Local Plan would not include an allocation of residential development land. It was necessary to obtain in 2006 a modest allocation at the Public Local Enquiry, and in the face of fierce resistance on the part of the Authority.

Rural Exception Schemes:

We negotiated the sale of the Rural Exception Site in Weston. A land owner who can secure a ten fold increase in the current use value of his land needs no further incentive. Allowing market houses of up to a maximum of 50% of the total number of dwellings of rural exception sites will inevitably result in a proliferation of proposals outside the settlement boundaries.

Generally:

The proposal that no further dwellings with ground floor bedrooms shall be built in those areas classified as ROY zones is Draconian. The number of retired home owners in the area is well above the national average. Many homeowners throughout the future will continue to require accommodation all on the ground floor. We are of the opinion that provided developers consider there is a market for such properties plus a proportion of “affordable homes”, they should continue building properties with bedrooms on the ground floor provided there is at least one double bedroom with an en-suite on the first floor which would act as a refuge on the 1st January 2115, and approached via a single flight of stairs designed to accommodate a stair lift.

Long Sutton is deserving of a similar allocation to that proposed for Holbeach. And what of poor old Sutton Bridge?! Hundreds of new jobs predicated on cheap electricity from the proposed Biomass Power Station, and nowhere locally for those people to live!

The approach to “other rural settlements” could be a little more positive. Encourage perhaps one or two additional dwellings per annum in order to give some encouragement to existing amenities. For example, no

new houses have been built in Gedney Dyke during the last ten years. The village shop is for sale. Encourage someone to take over the business by indicating that perhaps up to an additional twenty dwellings could be built in the village during the plan period. Identify those settlements which still have one or two facilities worth preserving.

Response_Number:	731	Persons_Name:	Carter Jonas	Representing_Who?:	RP Worth and Son
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Provision for Housing: Approach to Identifying the Quantity of Additional Housing to be Provided in South East Lincolnshire up to 2031</p> <p>Support is given for 'Option B', which is provided as a reasonable option for determining future housing targets across South East Lincolnshire. A fear over future planning applications being submitted on the grounds of a housing shortfall should not deter authorities from seeking greater levels of housing growth, which is much needed within this region. Housing shortfall applications are still required to be determined on the grounds of a 'presumption in favour of sustainable development', and therefore development on such justification would manifest itself in-line with the established strategic pattern of development; being located in higher tier settlements. Approach to the provision of Additional Housing in those parts of South East Lincolnshire that are Categorised as either Flood-Hazard Zone Red, Orange or Yellow.</p> <p>Support given for 'Option A', preferred policy option, as it provides a balanced approach that will meet both the housing growth needs of the area and also seek to reduce, as far as practically possible, the incidence of flood risk to both new and existing development.</p>	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>		<p>Objection - No change to the approach is required.</p>		

Response_Number:	758	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
It is agreed that there is a need for a flood risk policy.		Support noted.		Support - No change to the approach is required.	

Response_Number:	759	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
The DPD explains the policy context in detail and sets out a reasonable approach.		Support noted.		Support - No change to the approach is required.	

Response_Number:	760	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No changes are suggested.		Support noted.		Support - No change to the approach is required.	

Response_Number:	761	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
The identification and appraisal of reasonable and unreasonable options would appear acceptable for the South Holland District.		Support noted.		Support - No change to the approach is required.	

Response_Number:	762	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The preferred provision for housing policy approach for South Holland appears correct based on the historic build rate.	Support noted.		Support - No change to the approach is required.		

Response_Number:	763	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Option A is generally a reasonable approach, but Option B is not supported. Option B unduly restricts the amount of development that can occur on ROY land, whereby sustainable development that can be proved to be safe in flood risk terms may be prevented from coming forward simply because of the cap. We do not support the preference for Option B, but support Option A in principle.	The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22. 'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.' These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.		Objection - No change to the approach is required.		

Response_Number:	764	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:	We agree with an element of control of the number of homes to be built in the severest flood hazard zones, but would seek greater flexibility in the Local Plan to ensure development is facilitated in sustainable settlements.	Officer_Response:	These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:	765	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:	No changes are suggested.	Officer_Response:	Support noted.	Officer_Recommendation:	Support - No change to the approach is required.

Response_Number:	813	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
It is agreed that there is a need for a flood risk policy.		Support noted.		Support - No change to the approach is required.	

Response_Number:	814	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
The DPD explains the policy context in detail and sets out a reasonable approach.		Support noted.		Support - No change to the approach is required.	

Response_Number:	815	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No changes are suggested.		Support noted.		Support - No change to the approach is required.	

Response_Number:	816	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
The identification and appraisal of reasonable and unreasonable options would appear acceptable for the South Holland District.		Support noted.		Support - No change to the approach is required.	

Response_Number:	817	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The preferred provision for housing policy approach for South Holland appears correct based on the historic build rate.	Support noted.		Support - No change to the approach is required.		

Response_Number:	818	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
We agree with an element of control of the number of homes to be built in the severest flood hazard zones.	Support noted.		Support - No change to the approach is required.		

Response_Number:	819	Persons_Name:	Mr R Doughty	Representing_Who?:	J Wilson, S Mortimer, A & M Settlem
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No changes are suggested.		Support noted.		Support - No change to the approach is required.	

Response_Number:	866	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
It is agreed that there is a need for a flood risk policy.		Support noted.		Support - No change to the approach is required.	

Response_Number:	867	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
<p>The DPD explains the policy context in detail and sets out a reasonable approach.</p> <p>The reliance on the ROY zones is consistent with the Statement in Appendix 8, but there should be recognition that this is strategic data that is not intended to be used to determine planning applications that are accompanied by site specific flood risk assessments. It should be recognised that these will be more robust than the cruder broad brush data and assumptions used to determine the ROY zones, particularly at their periphery and on their boundaries.</p>		<p>The approach on the ROY zones has been refined and taken forward in the draft Local Plan. It is acknowledged that site specific Flood Risk Assessments are the appropriate means to determine planning applications.</p>		<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>	

Response_Number:	868	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
<p>References to the Regional Plan should be amended or qualified to take into account its revocation on 12 April 2013, which is referred to in paragraph 1.2.2, but not in paragraphs 4.1.13 through 4.1.20.</p>		<p>References to the status of the Regional Plan have been reviewed.</p>		<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>	

Response_Number:	869	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The identification and appraisal of reasonable and unreasonable options would appear acceptable for the South Holland District.	Support noted.		Support - No change to the approach is required.		

Response_Number:	870	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The preferred provision for housing policy approach for South Holland appears correct based on the historic build rate.	Support noted.		Support - No change to the approach is required.		

Response_Number:	871	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:	<p>Option A is generally a reasonable approach, but Option B is not supported.</p> <p>Option B unduly restricts the amount of development that can occur on ROY land, whereby sustainable development that can be proved to be safe in flood risk terms may be prevented from coming forward simply because of the cap.</p> <p>We do not support the preference for Option B, but support Option A in principle.</p>	Officer_Response:	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:	872	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:	<p>We agree with an element of control of the number of homes to be built in the severest flood hazard zones, but would seek greater flexibility in the Local Plan to ensure development is facilitated in sustainable settlements.</p>	Officer_Response:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:	873	Persons_Name:	Mr R Doughty	Representing_Who?:	Bovis Homes, Mr & Mrs Goodley and
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
No changes are suggested.		Support noted.		Support - No change to the approach is required.	

Response_Number:	923	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
It is agreed that there is a need for a flood risk policy. Within South East Lincolnshire, particularly in relation to Boston Borough, development is required to take place on land that is identified in the Lincolnshire Coastal Study as within a hazard area. That land is within such a designation does not prevent sustainable and safe development from being delivered.		Support noted.		Support - No change to the approach is required.	

Response_Number:	924	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	<p>The DPD explains the policy context in detail and sets out a reasonable approach.</p> <p>The reliance on the ROY zones is consistent with the Statement in Appendix 8, but there should be recognition that this is strategic data that is not intended to be used to determine site specific planning applications. Where site specific information becomes available during the development management process, it should be recognised that this will be more robust than the cruder broad brush data and assumptions used to determine the ROY zones, particularly at their periphery and on their boundaries.</p>	Officer_Response:	<p>The approach on the ROY zones has been refined and taken forward in the draft Local Plan. It is acknowledged that site specific Flood Risk Assessments are the appropriate means to determine planning applications.</p>	Officer_Recommendation:	<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>

Response_Number:	925	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	<p>References to the Regional Plan will need to be updated to take into account its revocation on 12 April 2013, which is referred to in paragraph 1.2.2, but not in paragraphs 4.1.13 through to 4.1.20 that are written on the basis it may be revoked and is still part of the Development Plan.</p>	Officer_Response:	<p>References to the status of the Regional Plan have been reviewed.</p>	Officer_Recommendation:	<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>

Response_Number:	926	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	<p>The identification and appraisal of reasonable and unreasonable options would appear acceptable, but it does not appear that the preference for one option to serve both administrative areas is suitable.</p> <p>Paragraph 4.16.1 explains that Option A is preferred because the historic build rates would suggest this is achievable.</p> <p>In respect of Boston Borough the historic rate of development of 263dpa substantially exceeds the Option A target of 226dpa, whereas the Option B target of 270dpa would appear consistent.</p>	Officer_Response:	<p>The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.</p>	Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>

Response_Number:	927	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	<p>The preferred provision for housing policy approach for Boston is too low in terms of the housing target, as the historic build rate is far greater (15%) than the preferred Option A.</p>	Officer_Response:	<p>The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.</p>	Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>

Response_Number:	928	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	<p>Theoretically Option A is a reasonable approach and Option B would appear less so.</p> <p>The policy discussion relating to Option B identifies the fact that, in respect of Boston Borough, the greatest housing proportion will be targeted for Boston town, which is all within the ROY zone. This then effectively relies on development in the surrounding settlements to provide a high proportion of housing delivery outside the ROY zone, irrespective of whether they are the most sustainable locations. This can be addressed either by reducing the proportion of housing that can be provided in the ROY zone or by reducing the housing target for Boston in favour of settlements at lesser risk, but still within the ROY zone.</p> <p>We do not support the preference for Option B, but support Option A in principle.</p>	Officer_Response:	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	929	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	<p>We agree with an element of control of the number of homes to be built in the severest flood hazard zones, but would seek greater flexibility in the Local Plan to ensure development is facilitated in sustainable settlements in the Boston Borough area outside the town of Boston.</p>	Officer_Response:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	930	Persons_Name:	Mr R Doughty	Representing_Who?:	Persimmon Homes
Respondents_Comments:	<p>We request that the provision of housing target for Boston is increased to the Housing Quantity Option B figure of 270dpa, to match the current build rate, and that the Reasonable Policy Option A is used to provide the final Provision for Housing.</p> <p>This increases the annual Housing Target to 270dpa of which 230dpa (85%) can be delivered in the ROY zone. This equates to a total housing provision of 5,400 in the Boston Borough of which 4,590 can be built in the ROY zone.</p>	Officer_Response:	<p>The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.</p>	Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>
Response_Number:	983	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:	<p>It is agreed that there is a need for a flood risk policy.</p>	Officer_Response:	<p>Support noted.</p>	Officer_Recommendation:	<p>Support - No change to the approach is required.</p>

Response_Number:	984	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:	The DPD explains the policy context in detail and sets out a reasonable approach.	Officer_Response:	Support noted.	Officer_Recommendation:	Support - No change to the approach is required.

Response_Number:	985	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:	References to the Regional Plan should be amended or qualified to take into account its revocation on 12 April 2013, which is referred to in paragraph 1.2.2, but not in paragraphs 4.1.13 through 4.1.20.	Officer_Response:	References to the status of the Regional Plan have been reviewed.	Officer_Recommendation:	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

Response_Number:	986	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The identification and appraisal of reasonable and unreasonable options would appear acceptable for the South Holland District.	Support noted.		Support - No change to the approach is required.		

Response_Number:	987	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
The preferred provision for housing policy approach for South Holland appears correct based on the historic build rate.	Support noted.		Support - No change to the approach is required.		

Response_Number:	988	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:	<p>Option A is generally a reasonable approach, but Option B is not supported.</p> <p>Option B unduly restricts the amount of development that can occur on ROY land, whereby sustainable development that can be proved to be safe in flood risk terms may be prevented from coming forward simply because of the cap.</p> <p>We do not support the preference for Option B, but support Option A in principle.</p>	Officer_Response:	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	989	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:	<p>We agree with an element of control of the number of homes to be built in the severest flood hazard zones, but would seek greater flexibility in the Local Plan to ensure development is facilitated in sustainable settlements.</p>	Officer_Response:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	990	Persons_Name:	Mr R Doughty	Representing_Who?:	Fen Properties
Respondents_Comments:	No changes are suggested.	Officer_Response:	Support noted.	Officer_Recommendation:	Support - No change to the approach is required.

Response_Number:	1137	Persons_Name:	Anne Casey	Representing_Who?:	RSPB
Respondents_Comments:	4.14.2– Quantity of additional housing This section needs a criteria to ensure that site allocation do not impact on designated sites.	Officer_Response:	These comments will be taken into account in the next stage of the plan-making process. These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.	Officer_Recommendation:	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

Response_Number:	1138	Persons_Name:	Anne Casey	Representing_Who?:	RSPB
Respondents_Comments:	4.20.2 Additional housing This section needs a criteria to ensure that site allocation do not impact on designated sites.	Officer_Response:	These comments will be taken into account in the next stage of the plan-making process. These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.	Officer_Recommendation:	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

Response_Number:	1139	Persons_Name:	Anne Casey	Representing_Who?:	RSPB
Respondents_Comments:	4.24.3 Provision for housing. The RSPB agrees that this section needs to be included in the HRA/AA. We strongly suggest that a Supplementary Planning Document is developed relating to incorporating biodiversity into urban areas and also a design guide that incorporates nesting boxes into buildings and habitat for wildlife into landscaping.	Officer_Response:	The Local Plan has been assessed through the HRA process and the Natural Environment policy amended.	Officer_Recommendation:	Objection - No change to the approach is required

Response_Number: 1146

Persons_Name: Angela Reeve

Representing_Who?: Cemex UK Properties

Respondents_Comments:

Paragraphs 4.11 4.16.2 of the DPD set out the approach to identifying the quantity of additional housing to be provided in South East Lincolnshire up to 2031 and establishes the preferred option to be Option A. Option A comprises an overall target of 696 additional dwellings pa for South East Lincolnshire; 226 allocated in the Boston Borough and 470 allocated in the South Holland District. Option A uses the housing needs set out in the respective SHMAs to establish a target and is identified as the preferred policy option as it is considered deliverable when compared with historic build rates. Option A is the lowest of the options provided, bar Option E which is based on a scenario of zero population growth . Although the use of SHMAs in setting housing targets is in accordance with the National Planning Policy Framework (NPPF, Paragraph 159), we would not consider that the chosen target is the best option in this instance for the reasons outlined below. The main purpose of the SHMA is to quantify demand and assist in establishing targets for types of market housing and the need for affordable housing; it should not necessarily be used to inform overall growth targets. After reviewing the SHMA for the Peterborough Sub-region, we have identified that the housing target for South Holland provided in Policy Option A (470 dwellings pa), is just one of three scenarios for growth set forward for the district in this document. The main analysis in the report is based on an assumed house building rate of 540 dwellings pa and not 470. The SHMA also identifies an estimated need for 587 additional affordable housing units per annum in order to meet the needs of the population. It is therefore unclear to us why the lower target has been chosen when a higher housing figure will go further in addressing the affordable housing need. The SHMA identifies that the higher the level of house

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

building, the lower the likely requirement for additional affordable housing; therefore a policy option which encouraged building more houses rather than less should be promoted for viability purposes within this context. We would suggest that housing targets should be set in accordance with the assessed need for new homes rather than on what is considered the most deliverable option. The SHMA relevant to Boston Borough (Coastal Lincolnshire SHMA) was completed in 2012 however the SHMA upon which the target figures for the South Holland District are based (Peterborough Sub-Region) was completed in 2010. In the absence of an up to date SHMA for South Holland, we consider that the housing targets informed by the Demographic Projections for Coastal Districts in Lincolnshire Report 2012 (Options C and D), are more reflective of the current need for housing in the South Holland District. The Demographic Projections for Coastal Districts in Lincolnshire Report, identifies two migration-led growth scenarios to distinguish the average number of additional dwellings needed pa. Migration-led A scenario, uses evidence from the 2011 MYE to ascertain a need for an additional 1236 dwellings pa; 553 in Boston Borough and 683 in South Holland District. Migration-led B scenario is similar to migration-led A scenario except that the projections are constrained to the populations evident in ONS SNPP 2010 . Scenario B establishes an estimated need for 1147 additional dwellings pa; 520 in Boston Borough and 627 in South Holland District. There is no clear reasoning provided for why Policy Options C and D are considered unreasonable other than that they would appear to be undeliverable based on the experience of the last 35 years or so. We consider this is insufficient justification for dismissing these targets. The targets should be based on the needs identified in the evidence base, as is stated in the NPPF (paragraph 47). We would also argue that the experience of the last 35 years is

irrelevant, especially within the context of the NPPF, which encourages Local Authorities to significantly boost the supply of housing; not to set targets which are shaped by past occurrences. Notwithstanding the above, it is also noteworthy that the SHMA identifies that in 2007/8, 560 homes were built in the South Holland district; with the housing market widely reported to be improving, we would argue that there is a capacity and a demand for a higher overall housing target. A potential argument for dismissing Options C & D is that they require a higher level of dwellings to be built within the Boston Borough which, due to flooding concerns, could be deemed unsustainable. However, we can see no reason why higher housing targets cannot be assigned to South Holland whilst keeping targets for Boston Borough at an appropriate level. We would argue that the options provided are too restrictive in this sense and that they do not allow for flexibility across the two local authority areas. Overall, the evidence provided is not robust enough to support the relatively low housing targets that have been set for South East Lincolnshire in the current version of the Local Plan. We believe that Option A does not truly reflect the objectively assessed housing need in the South Holland District. In relation to the Housing Growth options C and D it is not appropriate to discard higher housing options for one local authority area because of substantial deliverability issues associated with the other. The Council should consider the options for growth where the housing targets for South Holland District and Boston Borough are determined independently from one another. We therefore suggest that the South Holland District target should be increased to be reflective of the housing need outlined in the Demographic Projections for Coastal Districts in Lincolnshire Report 2012 without the Boston Borough target also having to increase.

Response_Number: 1156

Persons_Name: Mr S Marthews

Representing_Who?: CPRE

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

The Executive Committee of CPRE Lincolnshire has asked me to write in response to your consultation relating to the above plan.

In making its response to the consultation with regard to the draft South East Lincolnshire Local Plan, the Lincolnshire Branch of the Campaign to Protect Rural England (CPRE) wishes to concentrate on the housing policies proposed in the South East Lincolnshire Local Plan and the need to protect the fenland from flood risk. Also it takes this opportunity to comment on the future viability of rural life and the rural economy in the light of the proposed freeze on development outside of the main towns and "service centres"..

Housing Need

CPRE recognises that the last twenty years have seen a substantial increase in household formation which has created a demand for housing which is far outstripping supply and cannot be accommodated in the area covered by the draft plan. The increase is the result of changes in mortality rates, relationship breakdown, inward migration of labour, inward migration of retirees and also the easier commuting provided by improved rail services to Spalding.

CPRE does not see the justification for the acceptance in the plan of a lower rate of population growth than was experienced in South Holland in the decades 1991-2001 (13.4% more residents) or 2001 -2011 (15.4% more residents.) Growth experienced in Boston Borough was similar.

At first glance the plan area appears an obvious choice for substantial house building, with low population density and wide open spaces, but this is a misleading impression. CPRE takes the view that because of existing and increasing flood risk the plan area should be one of the last to be developed for this purpose. A better informed assessment of the area and

The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.

'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'

These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.

Objection - No change to the approach is required.

consideration of its history shows at once that the plan area has always been to a large extent unsafe for house building as a result of the flood risk. This is reflected in the way in times gone by settlements have developed only where silt mounds above sea level offered safe locations. The flood risk is set out in the draft plan and is confirmed by research both by Boston Borough and by South Holland District, which in turns confirms research by DEFRA..

The continuing flood risk from sea inundation, river flooding and excessive rainfall is now aggravated by increased water run-off from developments outside the fens and the fact that the land underlying the fens is tipping down into the sea at a rate of some 1.5cms a year.

The danger is increasing not just as a result of natural changes but because of the ill-judged decisions to reduce maintenance of secondary sea defences around the Wash and allow continuing damage to such sea defences. Some sections being ploughed down by local farmers.

While CPRE acknowledges the national need for new housing, its members are adamant that housing permitted under the plan, must be safe and sustainable.

CPRE Lincolnshire supports the more prescriptive approach to flood risk by the National Planning Policy Framework and urges both Boston and South Holland planning authorities to accept the national guidance that urges planning authorities to direct development away from areas at the highest risk from flooding.

CPRE takes the view that the considerable success of the Internal Drainage Boards in the fens in controlling water content and preventing flooding has lulled residents and businesses into a false sense of security For flood risk purposes, the draft plan divides South east Lincolnshire into three zones:

- Red where all property is at risk,
- Orange where most properties are at risk and

- Yellow where some properties would be at risk from sea flooding.

The remaining land has a residual risk from river flooding or excess rainfall.

The statement in paragraph 4.7.2 of the draft plan which is a refusal to impose guidelines on development on the plan area is in CPRE's view a breach of the duty of care owed by local authorities to its residents. It is irresponsible.

CPRE calls for a recognition that the Red & Orange Zone must be closed to further development and in all zones there is an urgent need to make existing properties and vital infrastructure including the pumping stations flood resilient.

Inundation of the plan area will not only put lives in jeopardy, and destroy livelihoods, but will seriously damage the nation's food security.

Response_Number:	1159	Persons_Name:	Mrs J Dean	Representing_Who?:	Anglian water
Respondents_Comments:	<p>We are encouraged by the focus on flood risk. However, we recommend it should clearly state within the policy that risk needs to be considered from all forms of flooding. Whilst fluvial flood risk is a significant constraint to the location of development, other forms of flooding, such as surface water should be a consideration particularly in design and layout. Appropriate management of surface water is critical for the long term resilience. Further consideration of the surface water management is required in order to mitigate and adapt to climate change. In particular some of the sewer systems in Boston are combined (conveys both foul and surface water). We recommend the flood risk policy includes a requirement to separate surface water from the combined system in any redevelopment in accordance with the NPPF technical guidance and the surface water management hierarchy in part H of Building Regulations.</p>	Officer_Response:	<p>Flood Risk is assessed from all sources including pluvial and surface water flooding. Flood risk policy and wording has been considered in the draft of the Local Plan.</p> <p>SuDS are part of the material planning considerations of the Local Plan. Improvements to existing systems can only be achieved when considered as reasonable to the needs of new development</p>	Officer_Recommendation:	<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>

Response_Number:	1165	Persons_Name:	Cllr Richard Austin	Representing_Who?:	Himself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Flood Risk	<p>The Draft Local Plan constantly refers to flood risk as if it was a certainty. It is not a certainty it is only a possibility. The last time that Boston suffered a serious flood was over 200 years ago and with improved defences it may well be another 200 years before there is a significant problem. I am pleased to say that after years of lobbying by local councillors the Environment Agency have softened their hard line and this softening policy should continue. However in the current Daft Plan the perceived flood risk still will unnecessarily restrict housing development in many parts of the Borough.</p> <p>The many new arrivals in Boston choose to live near the centre of the town, close to facilities. In the lifetime of this local plan they will need improved housing. Flood risk can be mitigated by appropriate building design so development should not be unduly hampered by the flood risk issue.</p>	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>	Objection - No change to the approach is required.		

Response_Number: 1171

Persons_Name: Mr J Dadge

Representing_Who?: Mrs T Croxford

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

Strategic Flood Risk

General comments in relation to questions 7, 8 and 9.

The general approach is supported whereby major new house allocations are directed towards the most sustainable of locations and those at least risk of flooding.

However, it is important to consider the long term future of those settlements and areas of sporadic development that are located within areas of some risk. To exclude all housing development from such areas could have significant impact on the social fabric.

With an ageing population, smaller families and an increase in the number of single parent families and lack of first time buyer homes, people who otherwise might want to remain in a particular location or area may have to relocate as a result of a lack of appropriate housing.

What could effectively be moratorium should not be placed on proposals which may be at some risk but which clearly demonstrate that they have been designed to be flood resilient and future proof. Such proposals should be given favourable consideration.

Building technology is improving in respect of flood resilience and the Local Plan should be sufficiently robust to recognise this and allow for small scale development in areas of higher risk as exceptions when it can be demonstrated that the scheme has been designed to address flooding and climate change in the short and long term.

Support noted.

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:	1184	Persons_Name:	Angela Newton	Representing_Who?:	Mr J and Mr G Eyett
Respondents_Comments:	Yes. We do NOT believe site WSN 015 is in a Flood Risk area.	Officer_Response:	Comments noted. It is not the purpose of the Preferred Options Document to assess particular sites, other than those identified as 'Broad Locations for Development'. This is the role of the SHLAA and in due course the Site Allocations DPD.	Officer_Recommendation:	These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:	1201	Persons_Name:	Mr and Mrs C Woods	Representing_Who?:	Themselves
Respondents_Comments:	I am continually exasperated at the lack of recognition and understanding to the professional role played by the Internal Drainage boards in our region. They successfully manage our inland waterways and this should be taken into account to a greater degree when assessing fluvial flood risk.	Officer_Response:	The internal drainage boards have been consultees in the assessment of the SFRA's and in the drafting of proposals and policies of the Local Plan.	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:

1202

Persons_Name:

Mr and Mrs C Woods

Representing_Who?:

Themselves

Respondents_Comments:

How can you dismiss options C and D out of hand as unreasonable, solely on the premise that the numbers are too big to achieve!

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number: 1227

Persons_Name: Mr J Brown

Representing_Who?: Ambrose Lighton

Respondents_Comments:

Q7 - Do you agree that there is a need for the preferred policy approach (see sections 4.5 – 4.10 under Approach to Flood Risk in the full consultation document for more information)? Please explain your view.

Q9 - What changes, if any, to the preferred policy approach or supporting text in the full consultation document would you suggest?

We fully support the need to provide a policy which sets out the approach to strategic flood risk in the plan area. The approach adopted must, however, be carefully balanced against other equally important objectives in the Plan. The overall strategy recognises that to meet the Vision and Strategic Priorities (in particular 1 and 3) development will be essential in flood risk areas. The level of overall growth which is targeted and how much of this should be provided within ROY zones must be critically assessed. In apportioning growth it may be necessary for a more refined assessment of ROY zones to distinguish between relative flood risk and flood hazard. This more forensic sift is proposed by the Plan, but will be delayed until the site allocations stage. However, it is considered that this should be assessed now in order that the maximum level of housing can be directed to the most sustainable locations.

In terms of the Preferred Policy wording (paragraph 4.24), this should be consistent with the adopted Spatial Strategy and reflect the reality that a large proportion of growth will need to go within high potential flood risk areas.

In taking forward broad locations, and ultimately in site

Officer_Response:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Officer_Recommendation:

Objection - No change to the approach is required.

selection, the Joint Policy Unit should provide an updated strategic assessment of flood risk in order to provide a clear position on the delivery of identified sites.

Response_Number: 1228

Persons_Name: Mr J Brown

Representing_Who?: Ambrose Lighton

Respondents_Comments:

Q10 - Do you agree with the identification and appraisal of reasonable and unreasonable options outlined in sections 4.11 – 4.16 under Approach to Identifying the Quantity of Additional Housing to be Provided in South East Lincolnshire up to 2031 in the full consultation document? Please explain your view.

We consider that in determining the appropriate level of growth consideration should be given to the following key factors:

- The current five year housing land supply makes provision for only 3.6 years supply, which represents a significant shortfall;
- The persistent under delivery of housing in Boston Borough;
- The proposed housing target falls below the conservative interim approach set out within the RSS of 270 per annum.
- No allowance has been made for the impact from potential further inward migration

Whilst the challenging economic conditions and weak local market conditions understandably suppress the local housing market at the current time, the role of the Local Plan is to plan positively for objectively assessed housing needs over a longer timeframe and to provide a framework to encourage delivery of growth. To ensure that the Plan meets to objective of being “positively prepared”, and can therefore be considered Sound, the above elements should be determining factors in setting the overall housing target.

In principle it is considered a valid approach to utilise objectively assessed housing needs drawn from the SHMA (Option A). The findings, assumptions and

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

conclusions of the SHMA cannot, however, be taken as read and accordingly the Soundness of the housing target thus relies on careful independent scrutiny of this document.

The in principle problem with Option B is that this would roll forward a baseline target which adopts a precautionary approach to growth.

It is of concern that the Migration Led Options C and D have been set aside solely on the basis that, with reference to historic rates of delivery, “these would appear to be undeliverable and thus unreasonable.” We are concerned that these are not clear and fully justified grounds for rejecting these options. The NPPF directs that plans should be positively prepared to meet the homes and jobs that are needed in an area, not what it is considered could be delivered based on past performance.

Response_Number: 1229

Persons_Name: Mr J Brown

Representing_Who?: Ambrose Lighton

Respondents_Comments:

Q11 - Does the preferred policy approach 'Provision for Housing' feature housing figures that are about right, too high or too low? Please explain your view.

The housing target for Boston Borough is largely predicated on the basis of historic delivery data. However, the level of historic delivery has fallen short meeting of projected needs. We consider that the housing figures for Boston should be based on the level of genuine need. Whilst the full level of 553 units per annum (assuming scenario C, Migration led approach) may not be attainable in the short term, if this is closer to actual housing need then it should be the longer term objective of the Plan.

We are concerned that the justification for Preferred Option A that it is considered deliverable when compared with historic building rates is not Sound, and would be in conflict with the Strategic Objectives of the Local Plan, because it would not meet objectively assessed housing needs and would be in conflict with national policy requirements to ensure the delivery of a five year supply of housing.

Paragraph 4.16.2 also raises concerns on the basis that the housing needs indicated by the SHMA are considered to be the most objective and comprehensive assessments for the short to medium term. This suggests that the housing target is being driven by what it is estimated could be delivered rather than what is needed.

Land is available on the edge of Kirton which is well located to the settlement and which could contribute to housing meeting needs during the plan period, thus ensuring the Soundness of the Plan.

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number:	1230	Persons_Name:	Mr J Brown	Representing_Who?:	Ambrose Lighton
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Q12 - Do you agree with the identification and appraisal of reasonable and unreasonable options outlined in sections 4.17 – 4.22 under Approach to the Provision of Additional Housing in Those Parts of South East Lincolnshire that are Categorised as Either Flood-Hazard Zone Red, Orange or Yellow in the full consultation document?</p>	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p>		<p>Objection - No change to the approach is required.</p>		
<p>We agree with the conclusions of this document that it would be unworkable and without justification to consider providing for Boston's housing needs within South Holland (4.17.1 to 4.17.4).</p>	<p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p>				
<p>Option A is, however, essentially an artificial construct which will as a result put significant pressure on smaller settlements which are less well equipped to deal with new growth. Growth should be directed to the most sustainable settlements, such as Kirton which is a Main Service Centre, as it has the facilities to support new population.</p>	<p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>				
<p>Large parts of Kirton are a low probability of flooding and with appropriate mitigation measures will be entirely appropriate to accommodate new growth. It is considered to be a flawed approach to simply overlook the potential of locations on the basis of a blanket restriction of all ROY zones without more of a critical examination to weigh up Red, Orange and Yellow locations, their relative flood hazard status and the sustainability and deliverability of growth.</p>					
<p>If a more rigorous up front assessment of sites is not feasible then any final cap on development in ROY zones should be in order to limit genuine flood risk/hazard and should not be so restrictive that it undermines wider growth objectives.</p>					

Response_Number:	1231	Persons_Name:	Mr J Brown	Representing_Who?:	Ambrose Lighton
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Q13 - The preferred policy approach 'Provision for Housing' proposes limits on the number of new homes that can be built in the severest flood hazard zones. Do you agree with this approach and, if not, please explain your views?</p> <p>It is recognised that the spatial approach must take account of the issue of coastal flood risk in determining the appropriate locations for future growth.</p> <p>The preferred Policy Option B compounds the concerns raised above with Option A by further limiting the level of development in ROY areas with an arbitrary cap. The problem with a cap on ROY zones is best illustrated by looking at the housing delivery figures. We can see from paragraph 4.24.2 that it is intended to deliver no more than 3,600 units in ROY zones which leaves over 920 units to be delivered in non-ROY zones. Currently, however, the SHLAA has only identified capacity for up to 242 units in non-ROY zones, which leaves a significant shortfall (assuming that all of the housing identified in the SHLAA can be delivered, which is by no means certain).</p> <p>To ensure that there is no impact on an already conservative housing target it is essential that the correct balance is struck between allowing development in sustainable locations, which are attractive to the market, in low flood hazard locations whilst ensuring that development is as far as possible steered away from the highest flood hazard/risk locations.</p>	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>		<p>Objection - No change to the approach is required.</p>		

Response_Number:	1232	Persons_Name:	Mr J Brown	Representing_Who?:	Ambrose Lighton
Respondents_Comments:	<p>Q14 - What changes, if any, to the preferred policy approach or supporting text in the full consultation document would you suggest?</p> <p>Given the fact that the key development centres (Boston and Kirton) are both located within ROY zones, it is considered that rather than providing a blanket cap on development in ROY zones the JPA should instead consider applying at the strategic level the refined sequential approach for selecting location at least hazard and/or probability of flooding (advocated for the selection of Broad Locations at paragraph 4.22.2). This will ensure that the policy objectives set out at paragraph 4.24 are fulfilled but that suitable sites, which through appropriate mitigation would be safe from flooding, are not overlooked.</p>	Officer_Response:	<p>The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.</p> <p>'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'</p> <p>These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	1253	Persons_Name:	Ms A Hewitson	Representing_Who?:	Environment Agency
Respondents_Comments:	<p>Q7 - Do you agree that there is a need for the preferred policy approach (see sections 4.5 – 4.10 under Approach to Flood Risk in the full consultation document for more information)? Please explain your view.</p> <p>We agree that there is a need for the preferred policy approach, which should clearly incorporate the spirit of the Lincolnshire Coastal Study (LCS) principles. The LCS is a major piece of evidence, produced as a result of the East Midlands Regional Examination findings, which considers sustainable options for the coastal settlements to develop given the increasing risk of flooding.</p>	Officer_Response:	<p>Support noted.</p>	Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>

Response_Number: 1254

Persons_Name: Ms A Hewitson

Representing_Who?: Environment Agency

Respondents_Comments:

Q8 – Does the preferred policy approach ‘Strategic Approach to Flood Risk’ help you understand how flood risk issues will impact on planning decisions? Please explain your view.

In the first instance, the strategic response to flood risk should be to identify the locations at lowest risk of flooding, which are appropriate to satisfy identified local needs. This approach does not come through in the text as written, which immediately moves to using flood resistance and resilience measure, i.e. mitigation before avoidance.

Cont/d..

4
We have significant concern that the strategic policies (Flood Risk and Development Management) do not include sufficient detail on the level of assessment and mitigation requirements that will need to be included in support of applications in flood risk areas to demonstrate that proposals are acceptable. This is an issue that the Planning Policy Statement 25 Practice Guide recommends is covered by a Strategic Flood Risk Assessment but neither Boston nor South Holland were comfortable with their respective consultants including this in the last reviews. It is our opinion that this should now be covered in the production of a Supplementary Planning Document (SPD), which would provide guidance and clarity to those promoting development. We note from the Local Development Scheme that the need for such documents will be considered in the future and we would be pleased to work in partnership with you to produce this. It would also be prudent to work with Lincolnshire County Council as it will become the SUDS approving body (SAB) in 2014. This would also be an opportunity to amalgamate all the flood risk „tools“ such as information from our Standing Advice Matrix, Lincolnshire Coastal Study Principles, Pathfinder

Officer_Response:

This Policy has been revised and agreed with the Environment Agency (EA). The EA have also been integrated in the site selection process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan

Projects, Surface Water Guidance Notes and the Surface Water Maps, which will be available later this year. We would recommend considering the Peterborough Flood and Water Management SPD and the Doncaster Development and Flood Risk SPD as examples of such documents.

Response_Number:	1255	Persons_Name:	Ms A Hewitson	Representing_Who?:	Environment Agency
Respondents_Comments:	<p>Q9 - What changes, if any, to the preferred policy approach or supporting text in the full consultation document would you suggest.</p> <p>We suggest that consideration is given to how the Policy could be rewritten to make it clearer or expanding supporting text within the local plan on the following:</p> <ol style="list-style-type: none"> 1. where the definitions of Essential Infrastructure, Highly Vulnerable and More Vulnerable can be found, i.e. the Technical guidance to the National Planning Policy Framework; 2. the need to fully apply the flood risk sequential test as defined in the National Planning Policy Framework (NPPF), and further expanded to incorporate the use of the Strategic Flood Risk Assessment (SFRA) hazard maps. Please note that the use of the SFRA relative probability maps for individual planning applications should not be promoted as these were only intended to be used to assist with strategic allocations, if several sites were found to be within the same hazard zone, i.e. a final step to assist strategic decision makers to differentiate the risk between given locations. The methodology used to produce these maps (as explained in paragraphs 9.29-9.33 of the SFRA) outlines that they are based on hydraulic modelling using current day defence conditions and are, therefore, not an appropriate tool for individual planning application decision making over the lifetime of residential development, i.e. 100 years; 3. how the Principles of the LCS have been used to inform the development of this strategic approach. For example, the NPPF advises that highly vulnerable development is not appropriate in flood zone 3, but due to the nature of flood risk in South East Lincolnshire it may be necessary to facilitate such development e.g. police stations, fire stations etc. We 	Officer_Response:	<p>This Policy has been revised and agreed with the Environment Agency (EA). The EA have also been integrated in the site selection process.</p>		
		Officer_Recommendation:	<p>These considerations have been taken forward in the draft Local Plan</p>		

also request that the supporting text specifically outlines those unacceptable uses, i.e. caravans intended for year round occupation and basement dwellings.

As a minimum, we would request that the reference to „Major development“ in the Policy text is replaced by „All development“ as there are no further references in other policies (i.e. Development Management or Design) to the need for proposals to be sequentially tested. This minor text change will ensure it is clear that all development proposals in flood risk areas need to demonstrate compliance with the sequential test.

Response_Number:	1256	Persons_Name:	Ms A Hewitson	Representing_Who?:	Environment Agency
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Q12 – Do you agree with the identification and appraisal of reasonable and unreasonable options outlined in sections 4.17-4.22 under Approach to the provision of Additional Housing in those Parts of South East Lincolnshire that are Categorised as either Flood Hazard Zone Red, Orange or Yellow in the full consultation document?</p> <p>4.17 We note the comments and difficulties explained in respect of the different housing market areas and whether one area can meet the housing needs of the other. We suggest that a further option for your consideration would be the possibility of outlying settlements, i.e. Bicker, Donington, Gosberton, etc accommodating larger housing growth, which may still satisfy other sustainability considerations whilst reducing the need for housing in the Red, Orange, and Yellow (ROY) zones further. This should not be constrained to the South East Lincolnshire area but consideration should also be given to cross-boundary areas such as Sibsey, Stickney and Friskney (in East Lindsey District Council's boundary).</p> <p>4.18.3, 1st bullet point – We request that the term „growth“ is used with caution in the submission draft of the local plan. We would request that it is made clear that strategic housing growth being accommodated in the ROY zones would be contrary to the recommendations of the LCS. Delivering housing to meet local needs (i.e. sustaining the existing community) will result in the housing stock increasing, but the „growth“ of Boston is designed to be of an economic nature. Economic growth is very much supported by the LCS recommending no restriction on the level of employment and business related uses that can come forward in the ROY zones. You may wish to consider making this recommendation more prominent within the Economy section of the Local Plan.</p>	<p>Whilst this issue is addressed to some extent in the Preferred Options Document, it is considered that this option is worthy of further consideration in the next stage of the plan-making process.</p>		<p>These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.</p>		

We note the options considered and do support the preferred policy Option B, which reflects the spirit of the LCS to lower the level of housing growth in the ROY zones in Boston and South Holland. However, we suggest that another option, some way between what is called “a precise interpretation of Principle 1 of the LCS” and the preferred option of a reduction from 85% to 80% is considered. An option to reduce the level of housing by a greater percentage would appear to contribute more to achieving the Plan's vision for “flood risk to guide the scale, distribution and nature of development across South East Lincolnshire” and developing a “response to the challenges of climate change, and particularly in respect of flood risk concerns”. We believe a more ambitious strategy to reduce the number of people at risk of flood hazard should be considered.

Response_Number: 1257

Persons_Name: Ms A Hewitson

Representing_Who?: Environment Agency

Respondents_Comments:

Q13 – The preferred policy approach ‘Provision for Housing’ proposes limits on the number of new homes that can be built in the severest flood hazard zones. Do you agree with this approach and, if not, please explain your views?

We accept that in order to sustain the existing communities” housing development will be necessary but it is paramount that development in the ROY areas is limited to that identified to meet local need, a recommendation from the LCS evidence. We, therefore, support Option A (paragraph 4.6.2), which advocates that the Local Plan must include a policy that sets out the strategic approach to housing and flood risk in South East Lincolnshire.

We request this Policy makes clear that the maximum numbers for the two districts include within the provision figure both open market and affordable housing within the ROY zone. We also request that the local plan policy is specific in terms of the starting date that applies to the cap for monitoring purposes.

Officer_Response:

The approach on meeting housing needs in the context of flood risk has changed in the Local Plan with the agreement and integrated cooperation of the EA.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan

Response_Number: 1275

Persons_Name: Mr P Coathup

Representing_Who?: Lincolnshire County Council

Respondents_Comments:

This is covered as a key issue, before the Spatial Strategy, because South East Lincolnshire has a significant number of communities and services in vulnerable but otherwise sustainable locations where flood risk is a significant threat. In particular, the sub-regional centre of Boston is almost entirely in a flood risk area. 85% of Boston Borough's and 19% of South Holland's population live in flood risk areas.

Lincolnshire has experienced population growth much higher than the national average since 2001. As a result current household projections result in historically high figures which are approximately twice the average house building rate experienced since 1976. These are considered unrealistic as a target, which must be deliverable in order to receive support from the Planning Inspector. There will be a need for new development of all types in areas at risk from flooding and the Local Plan will need to ensure that, where justified, such development is provided in the safest locations and in itself does not increase the threat of flooding.

The preferred approach is to set separate housing targets for Boston Borough and South Holland which are:

- a. Slightly below the historic building rate (to reflect current economic conditions);
- b. Lower in the flood risk areas as a proportion of the resident population (to adjust for flood risk) representing a maximum cap on development ;
- c. Located in the lowest flood risk areas possible using a sequential approach, with appropriate mitigation measures

As a partner, LCC broadly support this approach and will work with the JPU to strengthen the evidence base,

Officer_Response:

These comments will be taken into account in the next stage of the plan-making process. These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Officer_Recommendation:

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

by updating household projections using the latest available data. It is also considered, however, that the small reduction in development proposed in the flood risk areas compared to their existing population needs stronger justification, especially in Boston (80% compared to 85%). There a larger reduction (e.g. to 70%) could be appraised as a reasonable option, given the major potential conflict between the Sub-Regional role of Boston and flood risk concerns. Whilst this could have a disproportionate effect on the rest of the Borough (30% compared to 15% or 20%), there may be capacity to accommodate some of this in the northern part of South Holland.

The rejection of zero population growth option (as a precise interpretation of Principle 1 of the Lincolnshire Coastal Study) as an unreasonable option is supported but needs stronger justification than the current wording in Para. 4.19.3. This should be similar to Para. 4.19.1 rejecting the option of preventing any housing growth. The suggested wording is:

"The Demographic Projections for Coastal Districts in Lincolnshire study indicates that this would result in a limit of 62 dwellings per year in the Boston Borough ROY zones and 20 per year in the South Holland ROY zones. This approach could raise concerns about the future roles and functions of Boston as a sub-regional centre and the Main Service Centres in South Holland."

We would also like to see references to the statutory Local Flood Risk Management Strategy and to surface water flooding at appropriate places in the document. The preferred policy approach should also state specifically that mitigation includes flood resilient forms of development where its location in flood risk zones is unavoidable..

Greater use of maps and plans in this Section would be helpful to increase understanding of the flood risk

issues.

(Amplification of Para. 12, 1st sentence in Executive Councillor Briefing Note)

4.1 The Local FRM Strategy could be mentioned under strategic priorities, but LCC would insist that the section on policy context in chapter 4 explicitly identifies and describes it with its own paragraph, possibly at 4.1.25, though preferably earlier. It should be listed under its full title 'Joint Lincolnshire Flood Risk and Drainage Management Strategy', and a descriptive paragraph could be lifted from the introductory section of the Strategy document Part 1.

4.2 – no mention is made of assessing risk from surface water flooding. Although this will be low in this area it should be mentioned, together with the expected publication of new surface water risk maps in December 2013 by the Environment Agency, which will provide a national reference tool that planning documents will need to take into account.

The key findings of both SHMAs (Paras. 4.2.3 and 4.2.4) actually relate to affordable housing requirements and the mix of housing types required, and are therefore more relevant to Ch. 6. The housing requirement options were simply fed into the SHMA process from the sources quoted.

Para. 4.2.11 Suggest deleting the word "growth" in line 3, as two scenarios are zero growth "baseline" projections.

Para. 4.12.1 Please re-instate the reference to Option A being based on 2008 based household projections: as noted above the SHMAs did not assess "objectively assessed housing need", which is a term introduced in NPPF after they were produced, but simply used projections that were fed into them. This change would help clarify the justification of the Preferred Option (Paras. 4.16.1. and .2), which is supported.

Response_Number:	1298	Persons_Name:	Mr J Charlesworth	Representing_Who?:	Spalding and District Civic Society
Respondents_Comments:	<p>I'm afraid we have found this whole section almost impossible to get to grips with, partly because the question of actual housing requirements is difficult to disentangle from flood risk issues.</p> <p>Strategic Approach to Flood Risk – We find the second sentence of the Blue Box “Strategic Approach to Flood Risk” (p. 50) simply unintelligible.</p> <p>Table 4.1 – We find the note quite extraordinary. If the categorising of different “flood zones” ignores “the presence of defences”, then the whole of the discussion and the policies arising from it are built on circumstances that do not actually exist on the ground, as East Lincolnshire is possibly one of the best defended areas from flood risk in the country. Indeed, it has been suggested to us that, if both sea and river defences are maintained properly, then the whole Plan area is at equal, negligible risk, rather than the more alarming pictures presented in some of the studies.</p>	Officer_Response:	<p>It is considered that this issue is adequately addressed in the Preferred Options Document. It is recognised that balancing housing needs and taking account flood risk is a complex and contentious matter. The Plan needs to reflect a host of issues but within the context of local and national policy considerations. The preferred policy approach 'Strategic Approach to Flood Risk' attempts to set out a process for the consideration of all development proposals and the assessment of flood risk. It is considered that the approach reflects the approach of the NPPF and gives it local context.</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	1299	Persons_Name:	Mr J Charlesworth	Representing_Who?:	Spalding and District Civic Society
Respondents_Comments:	<p>Para 4.2.4 – We do not understand how the SHMA estimates of South Holland’s housing “needs” have been arrived at. Who are all the people wanting to come to South Holland? Why would they want to come?</p>	Officer_Response:	<p>Comments noted. The SHMA is not an estimate of who wants to come to South Holland. In fact there have been challenges to the approaches on the SHMA's that the 2011 census population growth has not been accounted for. The evidence included in the SHMA's is due to be updated. However, in general the current SHMA assessments are the housing needs of the population mainly reflecting new household formation (e.g. generated by family split ups and children leaving the family home to make their own homes)</p>	Officer_Recommendation:	<p>Objection - No change to the approach is required.</p>

Response_Number:	1300	Persons_Name:	Mr J Charlesworth	Representing_Who?:	Spalding and District Civic Society
Respondents_Comments:	Question 11 – How would an ordinary member of the public know?	Officer_Response:	Comments noted. The questions are provided to prompt opinions to be expressed, these may be informed or uninformed. Clearly someone who has no interest in the matter is unlikely to respond.	Officer_Recommendation:	Objection - No change to the approach is required.

Response_Number:	1370	Persons_Name:	Ms A Hewitson	Representing_Who?:	Environment Agency
Respondents_Comments:	We have concerns that some of the SA text through the document may be unrealistic. In particular, we refer to the entry at 4.20.6 (and other SA sections) that states „there is also the potential for new development to support the funding of new flood-defence-related infrastructure“. Numerous discussions have taken place during recent years on the economic difficulties faced by developers in delivering development, particularly in the Boston area, due to depressed land values. Despite the fact that we actively seek partnership funding for flood defences, you have advised us that the cost of including flood mitigation measures into developments can in many instances make proposals unviable. We would, therefore, suggest that the SA text that implies development could contribute to flood defence infrastructure be used with caution as it may not be a viable mitigation measure for delivering the local plan.	Officer_Response:	The Policy approach to seek opportunities for improvements to strategic flood defences (i.e. Not just limited to site specific flood mitigation) would be a positive response for the plan area. The Plan has an end date of 2036 and changing circumstances and opportunities could arise in the way that flood risk is managed and provided.	Officer_Recommendation:	Objection - No change to the approach is recommended

Response_Number: 1376

Persons_Name: Mr P Walls

Representing_Who?: Himself

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

Q7 The area with the greatest threat of significant damage in the event of a major flood incidence have been identified. Some of these settlements satisfy the sustainability criteria in part because the existing flood management measures reduce the possibility of major flood event occurring. An increasing threat from rising sea levels predates the current concerns around climate change . Addressing the increasing threat from rising sea levels is not a technical problem but the associated expense and a diminishing political will to emulate king Canute. It would not be prudent to ignore the fact of rising sea levels and the increasing expense and erosion of the political will.

The question is what to do about the existing settlements and isolated properties in the red most at risk zone. The first response is not to unnecessarily add to the problem. No more residential development in areas with the greatest risk from flooding and only any necessary infrastructure development for which there is no appropriate subject to an insistence that such development has the highest technically possible standard of mitigation and resilience protection.

Development in the orange most properties face some risk and the yellow some properties at risk zones In these areas development could be permitted subject to robust planning consent conditions relating to appropriate flood prevention and flood resilience measures. (These issues can be addressed through design - 3 storey dwellings with garaging and utility facilities at ground level, return valves of water supply and disposal, electricity circuits at waist level of ground floor spaces) Building regulation specifications like those in the Netherlands.

The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.
'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'
These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.

Objection - No change to the approach is required.

Flood resilience compliance will be an addition cost pressure on new build and in adapting existing properties to satisfy flood resilience standards. It need not make new build properties unaffordable (it doesn't in the Netherlands) and would confer substantial benefits on property owners making their properties insurable, mortgagable and sellable. In itself compliance with flood prevention and flood resilience measures would not inhibit development. It would address the political questions. If you choose to live in a high flood area should those who choose not to do so subsidise the property and contents insurance of those who do? And if you chose to live in areas of high flood risk should those who don't pay more tax than they need to so you can continue to enjoy your property and life style?

Response_Number:	1377	Persons_Name:	Mr P Walls	Representing_Who?:	Himself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Q8 It is the responsibility of the Planning system to prohibit inappropriate changes in land use not to encourage them. The current national government stance is that who benefit from flood prevention or mitigation measures should pay a larger proportion of the cost of prevention and mitigation measures than they currently do. New build in the red zone is the equivalent of granting new build consent yards from the crumbling cliffs at Withernsea (East Yorkshire).	The impact of flood risk on the proposed distribution of additional housing has been adequately addressed in the Preferred Options Document.		Objection - No change to the approach is required.		
NB the ABI will confirm that the most expensive flood damage claims arising from rising ground water tables. Currently DEFRA do not accept that rising ground water levels are a flood hazard.					

Response_Number: 1378

Persons_Name: Mr P Walls

Representing_Who?: Himself

Respondents_Comments:

Q9 see Q7 & 8 . Achieve a better balance between the need for some growth, sustainability and flood risk. See Transport.

Officer_Response:

Comments noted.

Officer_Recommendation:

Objection - No change to the approach is required.

ADDITIONAL HOUSING NEEDS.

There is some merit in determining the projected housing needs for Boston Borough and South Holland. An area Plan covering both Planning Authorities ought to be a co-ordinated Plan. There is little of a serious attempt to address the planning issues facing the two Authorities. South Holland is to participate in a Greater Peterborough Strategic Housing Needs Assessment Survey whose outcomes could prejudice the emerging area Plan. New build residential development in Boston Borough is constrained by the need to minimise residential development in those areas most at risk from potential flooding. Peterborough is constrained by the close proximity of its political boundaries with neighbouring Authorities and its rapidly growing need for more potential building sites. Boston Borough and South Holland have the similar need to provide more affordable housing in Boston and Spalding and in their rural hinterland.

Response_Number: 1379

Persons_Name: Mr P Walls

Representing_Who?: Himself

Respondents_Comments:

Q 10 It would be an unreasonable option to use the out of date Annual Housing Allocations contained in the defunct East Midlands Regional Plan which totally failed to anticipate the rapid population growth that has occurred as a consequence of inward migration. The more recent demographic projections postulated housing targets that used migration based information to inform potential housing targets for South East Lincolnshire, the excess growth in the population of the Plan actually underestimates the impact of inward migration which coincided with a fall in the inward migration of relatively affluent elders.. This upsurge in migrants created a shortage of 1 / 2 bed accommodation resolved in part by a subdivision of older properties and multiple occupation of housing below the need for registration as a dwelling in multiple occupation) The demographic profile in the Census 2011 suggests that the inward flow of migrant labour will continue. Nothing like this flow has been seen in the Plan area since the peak of the inward flow of affluent elders up to the early 'noughties'. In the late 1990's new build completion rates in South Holland regularly exceeded 600 units. The relevant experience is over the last 20 years not the last 35. Why are the migration led options undeliverable? There are currently @ 2800 extant permitted consents not yet completed. There are some 2250 outline consents not yet started in the South West Spalding urban extension alone which could be started quickly. In Spalding alone there are some 3200 sites that are deliverable in the event that there are no legal ownership constraints. The most recent completions data suggests that there could well be no capacity restraints. At current rates of construction the available supply of greenfield building plots in Spalding alone would last for 15 years. I do not agree with your analysis or your options.

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number: 1380

Persons_Name: Mr P Walls

Representing_Who?: Himself

Respondents_Comments:

Q11 I have previously indicated why I consider your housing predictions to be too low.

Officer_Response:

The need to undertake further work on 'objectively assessed housing needs' is recognised. The results of which will inform the next stage of the plan-making process.

Officer_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response_Number: 1381

Persons_Name: Mr P Walls

Representing_Who?: Himself

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

Q 12 There should be no new residential development in the red zone areas most likely to flood. In the orange and yellow flood risk zones planning consent conditions to enforced appropriate flood risk mitigation and resilience measures areas should apply.

The setting of caps to limit the number of new build in areas of potential flooding while it may placate local landowners and help to maintain some settlement's sustainability comes at a price.

Homeowners through insurance premiums and taxpayers will be expected to subsidise peoples right to live where they choose. This is unfair and unjust. The expectation of unlimited economic growth is unreasonable. Service provision that benefits householders and residents in a defined geographical area should expect to make the major contribution to the cost of providing that benefit. Part of that cost would be some restriction to live where you choose. Some equitable way needs to be found to help existing home owners render the properties as safe from flooding and its consequences.

If a policy of prohibition reduces the sustainability and hence attractiveness of threatened communities then let it happen.

The policy of planned retreat in the face of coastal erosion is more viable then playing Canute. The Plan should make it clear that not every house or settlement can be fully protected from the consequences of natural change.

The issue of flood hazard, and the requirement and basis for a 'cap' on future development in the ROY zones, has been adequately addressed in the Preferred Options Document, specifically sections 4.17-4.22.

'At the meeting of the Joint Committee on 25 November, officers updated their response by reporting a new concern about the need to increase housing provision in both Boston Borough and South Holland District in the light of new household projections. As a consequence of this action, it would be necessary to reconsider the nature of the cap on housing development in the ROY zones.'

These Considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g SHLAA and Housing Papers.

Objection - No change to the approach is required.

Response_Number:	1382	Persons_Name:	Mr P Walls	Representing_Who?:	Himself
Respondents_Comments:	Q 13 I agree with this approach. See previous text.	Officer_Response:	Support noted.	Officer_Recommendation:	Support - No change to the approach is required.

Response_Number:	1383	Persons_Name:	Mr P Walls	Representing_Who?:	Himself
Respondents_Comments:	Q 14 the evidence that justifies the total of new build to be permitted should be made public.	Officer_Response:	The objectively assessed housing need evidence is publicly available and its key findings were contained within the Plan document	Officer_Recommendation:	Objection - No change to the approach is required.
