



South East Lincolnshire Local Plan 2011-2036: Proposed Main Modifications (2018)

Comment Form

Comments must be received by 5pm on 28th August 2018 either by:

- **Email to:** programme.officer@southeastlincslocalplan.org; or
- **Post to:** Elaine Henton, Programme Officer, South East Lincolnshire Local Plan, Boston Borough Council, Municipal Buildings, West Street, Boston PE21 8QR

Late representations will not be accepted.

This comment form has three parts:

Part A : Your personal details

Part B : Your comment(s)

Part C : Notification Request

1. Please fill in Part A
2. If you are making representations on more than one Main Modification you will need to complete a separate form for each representation. However, you only need to complete Part A: Personal Details and Part C: Notification request once. (Please bundle your forms together so it is clear Part A and Part C relate to all the Part Bs)
3. Sign the Data Protection Act section at the end of the form, before returning it to us.

We have created **guidance notes** to help you with completing this form. **Please read** these before completing your comments as they will help you understand the nature of comment that is required.

Anonymous comments or those received outside of the consultation period will not be accepted.

PART A:

Personal Details		Agents Details (if applicable)
Title	Mr	Mr
First name	Christopher	Michael
Last name	Wilson	Braithwaite
Organisation (if applicable)		Robert Doughty Consultancy Limited
Address	c/o Robert Doughty Consultancy Limited	32 High Street Helpringham Lincolnshire
Postcode		NG34 0RA
Telephone No.		01529 421646
Email address		planning@rdc-landplan.co.uk

NOTE:

Representations will only be accepted that refer to:

- a proposed change shown in the schedule of 'Proposed Main Modifications' to the Publication Draft Local Plan (2017),
- a map change to the Publication Draft Local Plan (2017),
- the Habitats Regulations Assessment Report on the Main Modifications (2017) and
- the Sustainability Appraisal Report on the Main Modifications (2017).

Your responses on the above documents will be sent to the Planning Inspector without prejudice to the Inspectors final report.

You should not repeat or re-submit your previous representations, these have already been considered by the Inspector during the examination process.

PART B:

Please fill in a separate Part B for each comment you wish to make

1. To which Main Modification does your comment relate?	
Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM008):	MM013
Description of the proposed Main Modification (e.g. Policy 8 Improving South East Lincolnshire's Employment Land Portfolio, or Para 4.2.9, or Inset Map 19 Moulton)	New Policy 12

2. Do you consider this proposed Main Modification is:		
A. Legally compliant?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
B. Sound?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

3. If you consider the proposed Main Modification to be unsound please identify which test of soundness your representation relates to: 'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?	
Positively Prepared	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with national policy	<input type="checkbox"/>

Your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation and any suggested changes.

4. Please give details of why you consider the Local Plan is, or is not, legally compliant or sound?

Please be as precise as possible.

Our client owns the land promoted as Reserve Site GOS11 and the neighbouring land promoted as extensions to the cemetery and the playing fields.

The introduction of new Policy 12 to identify "Reserve Sites" to come forward should the allocated sites fail to bring forward housing development at the expected rate is a useful measure. It provides certainty for the landowners, prospective developers and local communities regarding potential areas for future development. The policy is clearly positively prepared because it sets out circumstances for bringing forward land into the future, it is justified by the need to maintain a supply of housing land, effective because the trigger for releasing sites is clear and unambiguous, and aligned with the National Planning Policy Framework. The drafting of the policy has anticipated the publication of the revised NPPF and the Housing Delivery Test procedure in July 2018.

The site is in Gosberton, a Minor Service Centre and a sustainable settlement. The site, as shown on Inset Map 18, has access to the services in the settlement and is associated with the proposed extension of the cemetery and playing fields to meet the requirements of the settlement as identified by the Parish Council. Together these developments will provide new, good pedestrian links within the settlement. The level of development is appropriate to Gosberton.

Although we have some concern regarding the process of identifying candidate sites for designation as Reserve sites (Some sites filtered out in previous exercises have not been re-assessed despite a fundamental change in circumstances that has removed the reason for filtering out those sites), GOS11 is, due to its location and the relationship to the expansion of the cemetery and playing fields, a sustainable and suitable location for residential development.

Please continue on a separate sheet / expand box if necessary.

5. Please set out what change(s) you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound, having regard to the test you have identified in Q3 where your comment relates to soundness.

You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text Please be as precise as possible.

No changes required.

Please continue on a separate sheet / expand box if necessary.

6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment in respect of this particular modification?

The Addendum to the Sustainability Appraisal (SA) considers the allocation of new sites and the identification of Reserve Sites at Paragraphs 3.43 to 3.47 and Appendix 4.

We note Section 2, Health and Wellbeing, takes no account of the new pedestrian links that will come with the development. The new housing will be adjacent to the extension of the cemetery and playing fields, which would reduce the walking distance from the site to the playing field significantly below the 640m quoted in the SA.

A similar reduction in walking distances to the village hall, doctor's surgery, etc would also be delivered by the development.

The development would also provide new pedestrian links for residents of existing development, potentially reducing the use of the car.

The SA does not take account of these issues, or the increase in playing fields to meet the growing demands of the settlement. The SA could be revised to take account of the new pedestrian links that can be provided by the development.

PART C: Notification request

You can request to be notified at an address or email address of any future stages relating to the Local Plan.

1. Would you like to be notified of future stages?

Yes	<input checked="" type="checkbox"/>
No	<input checked="" type="checkbox"/>

2. How would you like to be notified? Please select one answer.

By post to my address:	<input type="checkbox"/>
By post to my agent's address:	<input type="checkbox"/>
By email to my email address:	<input checked="" type="checkbox"/>
By email to my agent's email address:	<input type="checkbox"/>

3. Which stages would you like to be notified about:

The publication of the recommendations of Planning Inspector?	<input checked="" type="checkbox"/>
The adoption of the Local Plan?	<input checked="" type="checkbox"/>

Data Protection Act 1988 and Freedom of Information Act 2000

Representations cannot be treated in confidence. The Town and Country Planning (Local Planning) (England) Regulations 2012, requires copies of all representations to be made publically available, this will be done via the Council's website. The Council will not publish personal information such as addresses, telephone numbers, or email addresses.

By submitting a representation you confirm that you agree to this and accept responsibility for your representations.

Signature: <i>For electronic responses a typed signature is acceptable</i>	Michael Braithwaite	Date:	24 August 2018
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JOINT COMMITTEE RESPONSE FORM

REP: MM29

PMM REF: PMM013

The support for PMM013 is noted, and the Joint Committee has no comment.

In relation to the Sustainability Appraisal the site-specific appraisals consider each site in their current context. It is recognised that the provision of appropriate mitigation can improve the potentially negative effects of a development. This mitigation would not affect the original assessment of the context of the site or the identified effect.