



Our Ref: JWID2297/L013

8th December 2017

Elaine Henton
Programme Officer
South East Lincolnshire Local Plan
c/o Boston Borough Council
Municipal Buildings
West Street
Boston
Lincs PE21 8QR

Dear Elaine

SOUTH EAST LINCOLNSHIRE LOCAL PLAN 2011-2036

PROPOSED MAIN MODIFICATIONS – SUBMISSION OF HEARING STATEMENTS ON BEHALF OF UBS TRITON PROPERTY FUND

RESPONDENT NUMBER: 2320

I write in connection with the above and to provide further comments on the ‘Schedule of Proposed Main Modifications’ – 16/07/2018.

In this context we represented UBS Triton Property Fund at the Examination Hearings and dealt with retail issues. This included some discussion on the wording of what is now Policy 27 (previously Policy 23 – Additional Retail Provision).

Proposed main modification PMM026 puts forwards suggested final changes to the wording of the policy, provides for approximately 3,700 sqm net of additional comparison goods floorspace at Springfields Shopping and Festival Gardens (Site SHR010) in the period up to 2022 to meet the estimated need by that date.

A further sentence has also been added to ensure that as part of the expansion of the centre a package of measures are proposed to enhance the site’s connections to Spalding town centre and promote the attractiveness of the town centre as a place to visit.

Having been involved in the Hearings and promoted / agreed the above approach to the allocation of additional comparison floorspace at Springfields, we write in support of PMM026.

The proposed allocation at Springfields encapsulated in Policy 27 (formerly Policy 23) has been brought forward following the carrying out of a retail capacity assessment as part of the Plan’s evidence base, followed by the application of the sequential test as outlined in national planning policy (NPPF).

In light of this the allocation has been brought forward based on a quantitative assessment of future retail needs in Spalding and the allocation seeks to ensure the identified needs are met in the plan period.

In our view inclusion of this main modification would meet the relevant tests of being 'sound' in that the final wording of the policy is 'positively prepared', 'justified', 'effective' and 'consistent with national policy'.

I enclose the required consultation form fill in with the above and should you need anything further, please do not hesitate to contact me.

Yours sincerely

Jeremy Williams

**Jeremy Williams BA (Hons) MA MRTPI
Director**

Enc - As detailed above



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		
First name		
Last name		
Organisation (if applicable)		
Address		
Postcode		
Telephone No.		
Email address		

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):	MM
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)	

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

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.

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?

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	
No	

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

By post to my address:	
By post to my agent's address:	
By email to my email address:	
By email to my agent's email address:	

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

The publication of the recommendations of Planning Inspector?	
The adoption of the Local Plan?	

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>		Date:	
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**JOINT COMMITTEE RESPONSE
FORM**

REP: MM006

PMM REF: PMM026

The support for PMM026 is noted, and the Joint Committee has no comment.