

**Post\_title:** 2.1 Spatial Portrait

**ID1:** 24

**comment\_author:** Pedals - Spalding's Cycle Action Gr

**comment\_content:**

Chapter 2 generally We welcome the commitment to sustainable development and sustainable transport which appears throughout the plan, and in particular the many references to cycling. The definitions of "Transport Assessment" and "Travel Plan" in the Glossary reflect this commitment. We look forward to seeing this put into practice. We have noticed a number of places in the plan where the policies and supporting text should be adjusted in order to strengthen the commitment to cycling as a healthy, non-polluting, inexpensive mode of transport and leisure activity. These observations are central to our following comments on the plan.

**Officer Comment:**

Comments noted.

**Officer Recommendation:**

No change to the Local Plan is recommended

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

ID1:

25

comment\_author: Pedals - Spalding's Cycle Action Gr

comment content:

2.1 Spatial Portrait The Spatial Portrait d s not describe South East Lincolnshire adequately. It rightly draws attention to the flat landscape of South East Lincolnshire, and several of the consequences of this which need to be taken into account in planning the development of the area. However, the Spatial Portrait Lag to point out that the landscape lends itself to cycling, both as a means of transport and as a leisure pursuit. The Netherlands has a landscape which is similar to that of South East Lincolnshire. In The Netherlands, cycling is accommodated and promoted in both urban and rural areas. The Netherlands offers many examples of good practice in planning for sustainable, healthy, environmentally-friendly cycling which should be embraced in the planning of South East Lincolnshire. We suggest that a new paragraph should be inserted between 2.1.1 and 2.1.2:"The flat landscape of South East Lincolnshire is very suitable for cycling both as a mode of transport and as a leisure activity. It is comparable to The Netherlands, which offers many examples of good practice in planning for sustainable, healthy, environmentally- friendly cycling."

Officer Comment:

Undoubtedly South East Lincolnshire presents many advantages in terms of its terrain, location and attributes. Comparisons with the Netherlands are apt in terms of this but not necessarily in terms of the delivery mechanisms the Local Plan has available. Cycling is encouraged by the Policies of the Local Plan where development is proposed but as to encouraging more cycling the primary instigators are organisations such as "Pedals" and the County Council as Highway's Authority.

Officer Recommendation:

No change to the Local Plan is recommended.

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

ID1:

26

comment\_author: Pedals - Spalding's Cycle Action Gr

comment content:

Para 2.1.7 It is not clear what point is being made by contrasting the use of cycles for journeys to work in Boston and Spalding. We cannot comment further on this without knowing what point is being made, and how it has influenced the rest of the Plan. We will welcome further information.

Officer Comment:

The information with regard to cycling to work etc. is to give emphasis to existing cycle usage and potential cycle usage. Both the Boston and Spalding Transport Strategies provide further context and proposals. This Local Plan seeks to encourage access to cycling facilities and infrastructure where development proposals arise

Officer Recommendation:

No change to the Local Plan is recommended

ID1:

27

comment\_author: Mr and Mrs R Marsh

comment content:

Quotes from the Spatial Portrait:

Lincolnshire have the richest and most extensive agricultural and horticultural resources in the country

- South East Lincolnshire produces 50% of the UK's horticultural crops and 40% of the UK's potato needs
- It is the second most important provider in the UK. It is worth £470,000,000 towards the UK economy (resource in 2010)

Lincolnshire is primarily of rural character with extensive views and large open skies

To ensure that land is used efficiently and that the loss of South East Lincolnshire's high quality agricultural land is minimised by developing in sustainable locations in appropriate densities

End Quote

1. Development of Ged023 in Gedney goes against everything that is written in this Spatial Portrait.
2. It would impact on the crop production for our area, albeit a small impact, it is none-the-less an important consideration, and should be measured when deliberating where new housing would best be sited.
3. Ged023 in Gedney is Grade 1 prime agricultural land. Overriding this status to allow development and subsequent planning applications seems almost unbelievable. It is still being farmed; we understand a new 5 year contract has just been signed.
4. Food production versus meeting housing quotas set by government has to be a balanced approach. There must be other plots of land, not Grade 1 Arable, that should be given priority before building on this valuable resource.

Officer Comment:

The use of high grade agricultural land for development is an inevitable consequence of the need to meet housing needs. The land that has been identified by the Local Plan has been brought forward by land owners and developers and assessed by the Local Plan process.

Officer Recommendation:

No changes to the Local Plan are recommended.

ID1: 28 comment\_author: Environment Agency

comment content:

Paragraph 2.1.4 - The Spatial Portrait states that 'the Local Plan area attracts some 14,000 seasonal workers in agriculture and horticulture annually'. Paragraph 5.1.6 also refers to 'economic migrants taking up employment opportunities in the food growing and processing industry' and that 'this growth has impacted upon the two authorities in terms of the housing need generated'. It would be helpful if the Local Plan set out how this issue is being addressed. For example, are seasonal workers being housed in temporary accommodation, is there an expectancy that those employing seasonal workers will provide accommodation, or is the Local Plan meeting these needs through the provision of new dwellings within its overall housing needs assessment?

Officer Comment:

Seasonal work is an inevitable consequence of the horticultural economy. The housing/accommodation of seasonal workers has had impacts upon property (e.g. HMO dwellings) but it is impractical to evidence what changes in terms of seasonal needs will evolve. The SHMA takes into account population growth and makes assumptions with regard to what impact economic migration will have upon housing needs.

Officer Recommendation:

No change to the Local Plan is recommended.

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

<b>ID1:</b>	29	<b>comment_author:</b>	Spalding and District Civic Society		
<b>comment content:</b>	<p>2.1.4 Add a paragraph describing the age-profile of the Plan area with its disproportionate numbers of the elderly and exodus to university of young adults who don't return or aren't replaced owing to the shortage of employment opportunities at degree level and its consequences.</p> <p>Add a paragraph describing the far-reaching consequences of the 14,000 seasonal workers particularly in distorting the housing market. If the very much smaller number of gypsies, travellers and travelling showpeople merit a separate policy, how much more so does the problem of accommodating 14,000 seasonal workers. 2.1.5 Reference to education needed? The closure of village primary schools, for example, and St.Guthlac's at Crowland all have implications for transport and sustainability.</p>	<b>Officer Comment:</b>	<p>The Objectively Assessed Housing Needs evidence provides specific data on the demographic changes the plan area is likely to experience and what challenges are to be met.</p> <p>The accommodation of seasonal workers is not a specific problem as the hiring agencies make provisions.</p> <p>The needs of gypsies and travellers have a specific legislative context that the Local Plan must meet.</p> <p>The Local Plan will need to take account of arising infrastructure needs and impacts of changes.</p>	<b>Officer Recommendation:</b>	No change to the Local Plan is recommended

<b>ID1:</b>	30	<b>comment_author:</b>	Mike Harrison		
<b>comment content:</b>	<p>Finding attractive villages/towns locally is also somewhat difficult, when compared to Stamford/Oakham area because those areas are not basically flat or as fertile as the area around Spalding.</p>	<b>Officer Comment:</b>	Comments noted	<b>Officer Recommendation:</b>	No change to the Local Plan is recommended

## **Post\_title:** 2.2 A Vision for South East Lincolnshire

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

ID1:

31

comment\_author:

Pedals - Spalding's Cycle Action Gr

comment content:

2.2 A vision for South East Lincolnshire In the second paragraph of "Our Vision for South East Lincolnshire" the phrase "strategic highway improvements" should be explained, in the interests of clarity and to avoid any doubt about its meaning and interpretation. The document should state clearly that "strategic highway improvements" means improvements for motorists, cyclists and pedestrians. We suggest that the words "for motorists, cyclists and pedestrians" should be added after the words "strategic highway improvements". There should be an additional paragraph under the heading "Our Vision for South East Lincolnshire", inserted after the paragraph which begins "The delivery of key infrastructure..." It should state: "There will have been a significant modal shift away from the use of the private motor car and towards cycling and other forms of sustainable transport, especially for journeys of 2 miles and under in urban areas. This will reduce traffic congestion, reduce environmental pollution, contribute to healthier lifestyles, and reduce the costs of transport. "(Our reference to journeys of 2 miles and under is consistent with Lincolnshire County Council's policies in its Community Travel Zones. Although CTZs no longer exist as funding mechanisms, their underlying policies about modal shift remain valid.) This comment follows on from our criticism of the Spatial Portrait, provides the context for your Strategic Priority 11 (which we support in principle), and is consistent with paragraph 29 of the National Planning Policy Framework 2012.

Officer Comment:

Highway improvements are only a partial responsibility of the Local Plan; essentially where development proposals arise. The Boston and Spalding Transport Strategies and Countywide Transport Plans are the main frameworks for delivering specific transport outcomes.

Officer Recommendation:

No change to the Local Plan is recommended.

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

ID1: 32 comment\_author: Natural England

comment\_content:

Natural England broadly welcomes the vision and notes that it includes the protection and enhancement of environmental qualities and minimising the loss of high quality agricultural land. We would however like to have seen specific reference to the importance of the fenland landscape and the internationally protected wildlife habitats.

Officer Comment:

The Strategic Priorities are couched in fairly generic terms. In this respect the fenland landscape and Wash are included in SP 7 which includes the natural environment.

Officer Recommendation:

No changes to the local Plan are recommended

ID1: 33 comment\_author: Hume Planning Consultancy Ltd

comment\_content:

The vision for the Plan area and the strategic priorities identified are supported, particularly those seeking to guide development to sustainable locations in order to develop the spatial strategy that enables the Plan to meet the housing needs of the Plan area s population.

Officer Comment:

Comments noted

Officer Recommendation:

No changes to the Local Plan are recommended.



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

ID1:

34

comment\_author: Long Sutton and District Civic Soci

comment content:

The vision for the Plan is noted. We have concerns however about the realisation of the vision given that:-

a) The Councils appear to discount the evidence of the Lincolnshire Coastal Management Plan, Environment Agency and SHDC Flood Risk Strategy which suggest that new development should not take place over much of the plan area and/or that there is the likelihood of flooding in some settlements in the Society's area of interest (Long Sutton, Little Sutton, Sutton Bridge, Luton, Gedney Drove End, Dawsmere, Sutton St James, Tydd St Mary and Tydd Gote) within the likely economic life of housing built on sites allocated in the Plan.

b) There appears to be no recognition of the willingness or ability of developers to deliver new housing or commercial space in areas of high or medium risk flooding given the likely hardening of insurers attitude to risk after 1st April 2016 when the Flood Re flood risk insurance provisions come into force. Higher premiums for excluded properties may well have an impact to property values and therefore site viability and in a worst case scenario the refusal to underwrite insurance may result in the loss of development funding or mortgage finance. No provisions are made to substitute alternative sites outside flood risk areas to compensate for any that may be undevelopable as a result of these changes.

c) Sustainable communities depend on a wide range of influences only a few of which are within the direct control of the Plan. Much of the Plan area is for example rural and ill served by public transport. Further erosion of transport subsidy by the County Council, as is a distinct possibility over the life of the Plan will, other

Officer Comment:

The Lincolnshire Coastal Study has been given due weight in the consideration of how to meet the housing and growth needs of the plan area. This Study, at the time it was written, constituted a piece of evidence and has never had the status of a statutory planning policy document.

Infrastructure and sustainable needs are key considerations in the approach of the plan to meeting development needs hence the Spatial Strategy and distribution of development proposed. Whereas transport hubs can be an important determinant in selecting growth areas the housing need arisings do not necessarily correspond with such locations.

Whilst the Plan aims to provide sustainable development (e.g. housing in the proximity of employment) this can never be an exact science.

Officer Recommendation:

No change to the Local Plan is recommended.

things being equal, result in increased isolation for those without access to other means of transport from places of work, entertainment, shopping and health services. A greater focus of new housing around transport hubs as suggested in the NPPF review would help ameliorate this, recognising though that a bus stop in itself does not constitute a hub!

D) Allied to (c) the vision seeks to deliver the housing, employment and other needs of the whole population, but it is apparent from the distribution of proposed employment and housing sites that they are not necessarily where the jobs or housing is or will be needed to generate truly self-sustaining communities. This therefore largely defeats a principal tenet of the vision.

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ID1:	35	comment_author:	Lincolnshire Wildlife Trust
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comment content:
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The Lincolnshire Wildlife Trust supports the inclusion within the vision of the protection and enhancement of the natural environment. It is important that the natural environment is not only protected but also enhanced in line with the aspirations of the Natural Environment White Paper.

Officer Comment:
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Comments noted

Officer Recommendation:
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No change to the Local Plan is recommended.

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

ID1:

36

comment\_author: Spalding and District Civic Society

comment content:

2.2.1 The cumulative impression is that life is all about economics and flood risk. What about people? Therefore add at end of the first paragraph of Our Vision:- thereby enabling people to live healthy, fulfilled and creative lives.

Officer Comment:

The Vision tends to give emphasis to factors which the Local Plan can directly influence. The Objector's suggestions are more subjective and driven from within the individual, society and supportive services over which the Local Plan has no direct influence.

Officer Recommendation:

No change to the Local Plan is recommended

ID1:

37

comment\_author: Campaign to Protect Rural Englan

comment content:

The vision for the Plan is noted. We have concerns however about the realisation of the vision given that:-  
a) The Councils appear to discount the evidence of the Lincolnshire Coastal Management Plan and Environment Agency which suggest that new development should not take place over much of the plan area as a result of potential flood risk within the lifetime of proposed housing allocations.  
b) There appears to be no recognition of the willingness or ability of developers to deliver new housing or commercial space in areas of high or medium risk flooding given the likely hardening of insurers attitude to risk after 1st April 2016 when the Flood Re insurance provisions come into force. Higher premiums may well have an impact to property values and therefore site viability and in a worst case scenario a refusal to underwrite insurance may result in the loss of development funding or mortgage finance.  
c) Sustainable communities depend on a wide range of influences only a few of which are within the direct control of the Plan. Much of the Plan area is for example rural and ill served by public transport. Further erosion of transport subsidy by the County Council, as is a distinct possibility over the life of the Plan will, other things being equal, result in increased isolation for those without access to other means of transport from places of work, entertainment, shopping and health services. A greater focus of new housing around transport hubs as suggested in the NPPF review would help ameliorate this, recognising though that a bus stop in itself does not constitute a hub!  
d) Allied to (c) the vision seeks to deliver the housing, employment and other needs of the whole population, but it is

Officer Comment:

The Lincolnshire Coastal Study has been given due weight in the consideration of how to meet the housing and growth needs of the plan area. This Study, at the time it was written, constituted a piece of evidence and has never had the status of a statutory planning policy document.

Infrastructure and sustainable needs are key considerations in the approach of the plan to meeting development needs hence the Spatial Strategy and distribution of development proposed. Whereas transport hubs can be an important determinant in selecting growth areas the housing need arising do not necessarily correspond with such locations.

Whilst the Plan aims to provide sustainable development (e.g. housing in the proximity of employment) this can never be an exact science.

Officer Recommendation:

No change to the Local Plan is recommended.

apparent from the distribution of proposed employment and housing sites that they are not necessarily where the jobs or housing is or will be needed to generate truly self-sustaining communities. This therefore largely defeats a principal tenet of the vision.

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**Post\_title:** **2.3 Strategic Priorities**

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ID1:

38

comment\_author: Boston Woods Trust

comment content:

We are responding to the South East Lincolnshire Local Plan 2011-36, Draft for Public Consultation on behalf of the Boston Woods Trust. The Boston Woods Trust is a local charity that was founded in 2001 to provide the people of Boston with a much needed amenity for recreational purposes. It aims to eventually develop a 7 mile roughly crescent shaped corridor of woodland and parkland, to the west of Boston. To date we have developed over 110 acres in 2 sites which have been marked on the plans. Following talks with Boston Borough Council a possible site for the development of this proposed corridor was marked on Boston Borough Councils long term planning documents. The current Lincolnshire Natural Environment Strategy 2012~18 has BWT proposed development corridor marked. The Boston Woods Trust are surprised and disappointed that this draft plan does not include a potential or safeguarding corridor for green infrastructure. It does show vast areas for "Potential Housing Site", much more than will be required to meet the house building required up to 2036. It also marks a "Safeguarding Corridor" for a proposed distributor road. The Boston Woods Trust aims and objectives will help to achieve; - Strategic Policies; 1,2,5,7,25,28,30 and 31 as listed in table 2. ~ Strategic Priorities; Sustainable Development, 1 and 3 ; Economy 4 ; Environment 7,8 and 10 ; Transport 11 and 12, as listed in table 3. ~ The wishes as set out in section 7," A Distinctive, Greener, Cleaner, Healthier Environment". it is some relief that the Boston Woods trust Project is mentioned in this section, see 7.1.12. If the Boston Woods trust is to continue as a thriving local charity, contributing to the local environment, it will need the support of Boston

Officer Comment:

The Local Plan has, though its evidence base, assessed open space requirements and what the findings of the HRA might mean in providing compensatory open space. The Boston Woods are an important asset however they are one mechanism by which needs might be addressed. Should additional compensatory open space be a critical matter to be met by the Local Plan then certainty about its delivery will be an expectation.

Officer Recommendation:

That the Local Plan provides appropriate and deliverable mechanisms to meet open space needs especially if triggered by the HRA.

Borough Council. If as in this draft plan it is not given the priority of a potential or safe guarding site, as are housing and roads, we fear that our hopes and hard work will mean little. To extend the corridor of woodland and parkland the Boston Woods Trust has to buy land, relying on donations to do this. Now that land owners understand that their land is "Potential Housing Site" it will make it prohibitively expensive and we will not be able to develop in such areas. We would like to meet and discuss these points further and elucidate how much support our project has at Boston Borough Council.

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ID1:

39

comment\_author:

Pedals - Spalding's Cycle Action Gr

comment content:

2.3 Strategic Priorities Strategic Priority 8: The commitment to modal shift is as relevant to this environmental priority as it is to Strategic Priority 12. We suggest that these words should be added in the penultimate line: "...green infrastructure network, facilitating a modal shift towards cycling and walking, and by minimising Strategic Priority 11: We support this. Strategic Priority 12: In the first line, "increase" should be replaced by "maximise", in order to clarify the Councils commitment, and to be consistent with the word used in paragraph 29 of the NPPF. In the third line "Rural areas" must be defined. The importance of the private car is especially noteworthy only in those rural areas which are remote from essential services and facilities and where there is no public transport available. Many people regard the whole of South East Lincolnshire as being a "rural area" and this strategic priority should not be open to the interpretation that particular prominence is given to the motor car throughout South East Lincolnshire. In the third and fourth lines, "highway infrastructure" must be defined to clarify that it includes infrastructure for the benefit of motorists, cyclists and pedestrians. (See comment above about the Vision for South East Lincolnshire.) Strategic Priority 12 must make clear that the aim of minimising congestion will be achieved, in part, by improving the infrastructure for cycling and walking and consequently encouraging a modal shift away from the use of the motor car. It must not be assumed that minimising congestion will be achieved only by constructing more highway capacity for motor vehicles. (For example, there are countless examples in Germany and elsewhere of asphalt tracks parallel to main roads

Officer Comment:

Highway improvements are only a partial responsibility of the Local Plan; essentially where development proposals arise. The Boston and Spalding Transport Strategies and Countywide Transport Plans are the main frameworks for delivering specific transport outcomes.

Officer Recommendation:

No change to the Local Plan is recommended



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

used by agricultural vehicles, pedestrians and cyclists. This good practice is unknown in Lincolnshire.) We suggest that Strategic Priority 12 should be rewritten: "To maximise the potential for modal shift to sustainable forms of transport, while recognising the importance of the private car in those areas which are remote from essential services and facilities and where there is no public transport available, by seeking to improve South East Lincolnshire's highway infrastructure for the benefit of motorists, cyclists and pedestrians and thereby minimising congestion, improving road safety and aiding economic development. "

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ID1: 40 comment\_author: Mr I Farmer

comment content:

The omission of rail infrastructure from the Transport Priorities seems strange. Highway infrastructure is specifically mentioned within the wider context of modal shift, but rail is not given the same status even though there is reference in the Plan to a Rail Freight Interchange and influencing the new rail franchise.

Officer Comment:

Transport infrastructure is only a partial responsibility of the Local Plan; essentially where development proposals arise. The Boston and Spalding Transport Strategies and Countywide Transport Plans are the main frameworks for delivering specific transport outcomes.

Officer Recommendation:

No change to the Local Plan is recommended.

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

ID1: 41 comment\_author: Mr John Stuart Birkett

comment\_content:

Strategic Priority 11: This statement in effect says, 'Reduce the need to travel by providing transport'. It would be better to say that the need to travel would be minimised by siting future jobs, services and facilities as close as possible population centres.

Officer Comment:

The objector has provided their own interpretation of the Strategic Priority and then sought to suggest an amendment based upon that interpretation. The Local Plan seeks to deliver sustainable forms of development and from that point of view can only present the opportunity for people to live and use resources more sustainably.

Officer Recommendation:

No change to the Local Plan is recommended

ID1: 42 comment\_author: Natural England

comment\_content:

We generally support the Strategic Priorities particularly those that concern the Environment (7, 8 & 9).

Officer Comment:

Comments noted

Officer Recommendation:

No change to the Local Plan is recommended

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

ID1:

43

comment\_author:

Hume Planning Consultancy Ltd

comment content:

The vision for the Plan area and the strategic priorities identified are supported, particularly those seeking to guide development to sustainable locations in order to develop the spatial strategy that enables the Plan to meet the housing needs of the Plan area s population.

Officer Comment:

Comments noted

Officer Recommendation:

No changes to the Local Plan are recommended

ID1:

44

comment\_author: RSPB

comment content:

The RSPB believe that the environment section of the strategic priorities lacks ambition for the natural environment of South East Lincolnshire. We are concerned about the use of the wording 'where appropriate' under point 7, which is dismissive of the Authorities legal duties to conserve and enhance nature under the Natural Environment and Rural Communities Act (2006). Furthermore, it is the RSPB opinion that the strategic priorities currently fail to meet NPPF criteria to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure [NPPF, para 114], and are not strong enough to achieve an appropriate balance between development and biodiversity required for sustainable development. The RSPB strongly recommend that the strategic Priorities are amended to properly value the unique and special natural environment of South East Lincolnshire, ensuring it is conserved and enhanced and sustainable development is delivered.

Officer Comment:

The Strategic Priorities are not policies and it is the relevant Policies which will fulfill the requirements of the legislation.

Officer Recommendation:

No change to the Local Plan is recommended

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

ID1:

45

comment\_author: Lincolnshire Wildlife Trust

comment content:

The Lincolnshire Wildlife Trust welcomes SP1 to ensure that development is sustainable and will protect and enhance the environment. The Trust supports SP3 in the need to ensure that development contributes to the provision of necessary green infrastructure. The Lincolnshire Wildlife Trust would support the incorporation of design measures within developments to enhance wildlife habitats, and would strongly recommend that any development should seek to enhance the biodiversity of the area. For example, consideration should be given to making the most of opportunities for enhancing green infrastructure and accessible natural greenspace to benefit both residents and wildlife. We would recommend the requirement for the inclusion of features for wildlife within the design of new developments, such as bird and bat boxes, wildflower meadows, ponds and hedges. We would also recommend that sustainable urban drainage systems (SUDS) that provide excellent wildlife habitat should be encouraged. The Trust strongly supports SP7 to conserve and enhance the natural environment. The Lincolnshire Wildlife Trust supports SP8 to adapt to, and mitigate against the effects of, climate change. We welcome the reference to enhancing the green infrastructure network. Climate change will increasingly put pressure on species and habitats which, if isolated, will find it difficult to adapt. Green corridors and large scale habitat creation will become increasingly important to allow space for species and habitats to migrate in response to the stresses caused by climate change. Consideration should be given to incorporating green corridors, such as hedgerows and drains, into new developments to link up areas of accessible natural

Officer Comment:

The comments are noted and are taken up in the appropriate Policy sections of the draft Local Plan

Officer Recommendation:

That the Local Plan addresses the detailed considerations within the appropriate policies.

greenspace. Certain elements of SUDS such as ponds can benefit both people and biodiversity by reducing the risk of flooding and providing a wildlife resource. We would recommend that the word suitable is added to SP9 before previously-developed land. Some brownfield land may have developed a high biodiversity interest and may not therefore be suitable for development.

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ID1:	46	comment_author:	Spalding and District Civic Society		
comment content:	2.3.1 Strengthen. Delete 'where appropriate' or move to before 'enhance' 10 Add at end:- thereby enabling people to live healthy, fulfilled and creative lives.	Officer Comment:	Deleting "where appropriate" is not accepted as different designations have different weightings and "appropriateness" will still be a judgement that is relevant. Moving the term is considered to provide no material change.  The Strategic Priorities tend to give emphasis to factors which the Local Plan can directly influence. The Objector's suggestions are more subjective and driven from within the individual, society and supportive services over which the Local Plan has no direct influence.	Officer Recommendation:	No change to the Local Plan is recommended.

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

ID1:

47

comment\_author: Anglian Water Services Ltd

comment content:

Objective 8 refers to promoting energy efficiency. It would be helpful if the text read as follows: promoting resource efficiency to ensure water efficiency is included.

Officer Comment:

The essential theme of SP 8 is with regard to climate change and energy efficiency. Use of resources is already clearly linked. Specific resources are picked up in more detailed Policy considerations.

Officer Recommendation:

No change to the Local Plan are recommended.

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