

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

Post_title: 1.4. Supporting documents

ID1:	196	comment_author:	Gladman Developments Ltd		
comment_content:	2.2 Sustainability Appraisal [Summary This section of the representation sets out the requirement for Sustainability Appraisal and its role in the Local Plan process.]	Officer Comment:	The Submission Draft of the Local Plan will be supported by an SA.	Officer Recommendation:	No change to the approach is required.

ID1:	197	comment_author:	Sport England		
comment_content:	In terms of the evidence base documents underpinning the emerging plan, the Baseline Infrastructure Statement (Green Infrastructure Section) still contains only outline information. I would draw your attention to previous comments made in 2013 [comments attached to email for ease of reference]. In terms of evidence base issues, these earlier comments are judged to remain largely relevant, although the 2012 Sports Provision and Open Space Assessment is now also 4 years old.	Officer Comment:	The Submission Draft of the Local Plan will be supported by an updated Infrastructure Delivery Plan.	Officer Recommendation:	No change to the approach is required.

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ID1: 198 comment_author: Historic England

comment content:

Sustainability Appraisal -

Historic England maintains its concerns with the background and reasoning for the proposals in relation to the assumptions made for heritage assets and their setting as presented in the draft Plan and associated SA. It is disappointing that, despite our advice of 17 February 2016, no further evidence has been provided in relation to any methodology adopted to assess the historic environment/heritage assets/their setting in relation to housing allocation sites. As such it remains unclear how the historic environment/heritage assets/their setting have been considered for previously proposed sites, where responses have been made to comments made at the earlier stage, and also in relation to new sites which are proposed to be taken forward as preferred sites.

Historic England's previous comments, particularly those of 17 February 2016, have been responded to in the updated information available at this time, and mostly rebut the comments made. However, it is not clear what additional assessment work was undertaken and how conclusions were reached. It is not clear in some cases that setting and non-designated heritage assets have been considered. On this basis, previous concerns are maintained and are also considered relevant to the consideration of new sites which are proposed to be taken forward as preferred sites. We would be happy to discuss these issues further prior to the publication stage.

Officer Comment:

Noted. Discussions have since taken place with Historic England regarding their concerns. See below:

In order to help resolve the issue, the Local Plan team formulated a Site Selection Methodology Note in relation to Heritage Assets which was sent to Historic England in September 2016. A response to this note was received in November 2016.

Following consideration of Historic England's response, the Local Plan team contacted Historic England in November 2016 with a number of proposals to address their concerns relating to site selection. Historic England agreed that the Local Plan team's proposals would be a comprehensive approach to considering the impact of potential development allocation sites on the significance of heritage assets and their settings. See Officer Recommendation column for details of the work to be undertaken.

Officer Recommendation:

BBC's Consultant Architect and SHDC's Conservation Officer to undertake more detailed assessment of sites where there is the potential for impact on heritage assets. This would mean completing a strategic level heritage assessment for all potential housing and employment sites consulted upon in January 2016. Each site should also be subject to a high level appraisal of its archaeological potential by Lincolnshire County Council's Historic Environment Officer. Further specialist advice should be sought for any sites where an officer is of the opinion that the site needs to be taken forward as an allocation.

The current iteration of the SA d s not address the issues raised by Historic England on the Crowland site in previous comments of 17 February 2016.

Employment paper -

Historic England's previous comments in respect of the Thorney Road, Crowland site have not been included in the paper, and there is no reference to the site itself in the paper other than at the end where it is cited as a preferred site to be taken forward.

As with the housing allocation sites it is disappointing that, despite our advice of 17 February 2016, no further evidence has been provided in relation to any methodology adopted to assess the historic environment/heritage assets/their setting in relation to employment allocation sites. As such it remains unclear how the historic environment/heritage assets/their setting have been considered for previously proposed sites, where responses have been made to comments made at the earlier stage, and also in relation to new sites.

Retail paper

It is noted that no clear way forward in respect of retail allocation at this stage of the plan process and there is now a call for retail sites being undertaken. It is disappointing that opportunity to comment on any retail allocations will take place at the publication stage of the plan expected in October 2016 as per the plan timetable. Historic England wishes to reiterate advice provided in February 2016 relating to published advice

on site allocations in Local Plans which covers all types of allocation and sets out a site selection methodology in relation to heritage assets which may be of use to you at this time.

SHLAA

The SHLAA continues to refer to 'historical assets' rather than 'heritage assets' and it is recommended that this be amended in line with NPPF terminology. The SHLAA environmental impacts for the historic environment do not include reference to Registered Parks and Gardens and non-designated heritage assets are not referred to either. On this basis the approach to site selection continues to be flawed since it is not evident that heritage assets have been fully considered in relation to the assessment of housing allocation sites, resulting in a plan which is not sound since it does not comply with the requirements of the NPPF.

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ID1: 199 comment_author: Mr D Bryant

comment content:

South Lincolnshire Local Plan

1] Employment Paper (July 2016)

Having perused this document, there d s not seem to be much to object to in the responses to earlier comments on the Consultation Draft.

Boston has traditionally been a 'low-wage area', ever more so in recent years, and its economy therefore seems to keep on declining.

Boston needs increased employment opportunities with higher wage levels, otherwise our most able school leaves will continue to desert the area in search of better quality prospects.

Planning policies in respect of employment and site allocations must therefore be flexible and attractive to inward investors and new businesses, being driven by the need for job creation and economic growth. The only caveat would be to ensure that any out of town land uses compliment the vitality and viability of the town centre, and not compete against it.

A positive, welcoming and encouraging planning strategy, producing an attractive option to alternative locations with flexible and speedy decisions is an essential ingredient in promoting Boston as a great place to live and work.

Wherever possible, barriers to new employment opportunities must be removed.

Officer Comment:

The South East Lincolnshire Employment Land Technical Paper identifies that the Plan area has traditionally been a low wage area. One of the key priorities of the Greater Lincolnshire Strategic Economic Plan is to create an environment which helps diversify the economy, thereby helping to attract more, better skilled and better paid jobs to the area. This should help encourage more, younger people to stay in the area. The emerging Local Plan translates this aim into policies, by identifying a minimum of 82ha of employment land, in a variety of locations across the higher tiers of the settlement hierarchy, within which B uses can be accommodated, supported by appropriate ancillary non B development. This flexible approach should help minimise barriers to employment while also protecting the Plan area's town centres

Officer Recommendation:

No change required.

2] Housing Paper (July 2016)

Further to my consultation submission dated 28th January 2016, I am pleased to note that the proposed residential development site allocations sit comfortably with existing developments, with major new sites being linked to the provision of the proposed Distributor Road, and to the south of Boston town centre.

3] Road Infrastructure

Like the majority of Boston's residents, I would like to see that Distributor Road being converted into a proper By-Pass which would substantially improve the economic prospects for Boston for generations to come.

Boston and the East Coast would become so much more attractive and successful for locals, visitors, businesses and tourists to the whole region of south and east Lincolnshire.

Boston is the second largest town in Lincolnshire.

Lincoln, Stamford, Spalding, Market Deeping, Sleaford, Burgh-le-Marsh, Partney, Grantham, Louth all have by-passes - why not Boston?

Post_title:

1.6 The relationship of the South East Lincolnshire Local Plan with other planning documents

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ID1: 200 comment_author: Gladman Developments Ltd

comment_content: Officer Comment: Officer Recommendation:

1 National Planning Policy and Guidance

No comments are made which require a response or amendment.

No change to the Local Plan is proposed

1.1 National Planning Policy Framework

[Summary “ This section of the representation quotes Section 47 of the NPPF in relation to the role that Local Plan's have in meeting the objectively assessed need (OAN) for housing. Also quotes Sections 14, 152, 158 and 159 in relation to identifying and meeting the OAN. Section 182 is quoted with regards to the four tests of soundness in the NPPF.]

1.2 Planning Practice Guidance

[Summary “ This section of the representation summarises the Housing and Economic Development Needs chapter of National Planning Practice Guidance.]

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5.1.1 All sustainable settlements will have a pivotal role in delivery the Council's full housing and economic needs. The Council has made a positive start into the consideration of these issues, but substantial further work is still required if the plan is to progress. In order to meet the tests of soundness contained at s182 of the Framework, the emerging South East Lincolnshire Local Plan must be found to be positively prepared, effective, justified and consistent with national policy.

Post_title: **1.7Duty to co-operate**

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ID1: 201	comment_author: Gladman Developments Ltd	
comment_content: 2 Legal Compliance 2.1 Duty to Cooperate [Summary “ This section of the representation sets out the background to the Duty to Cooperate (DtC), making reference to Planning Practice Guidance and how the DtC should be demonstrated/met.]	Officer Comment: No comments are made which require a response or amendment.	Officer Recommendation: No change to the Local Plan is proposed

ID1: 202	comment_author: Norfolk County Council	
comment_content: Thank you for consulting Norfolk County Council on the above Local Plan consultation. At this stage it is not considered that the Local Plan consultation (Preferred Sites) raises any strategic cross-boundary issues with Norfolk County Council. Obviously you would consult the County Council when you review your Local Plan. I assume, under your statutory duty to co-operate (Localism Act 2011), that if you feel there are any strategic cross boundary issues arising or likely to arise that you would seek further discussion with Norfolk County Council i.e. through myself as the first point of contact. If you have any queries with the above comments please call or email me.	Officer Comment: Comments noted	Officer Recommendation: No change to the Local Plan is proposed