

Chapter_Name:

11 Delivery

Response_Number:

33

Persons_Name:

Ginney Hall

Representing_Who?:

Mobile Phone Operators

Respondents_Comments:

We would take this opportunity to comment that we consider it important that there is a telecommunications policy within the emerging Strategy and Policies DPD. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development. The National Planning Policy Framework (NPPF) at paragraph 42 confirms that; "advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services." Paragraph 43 of NPPF confirms that; "in preparing local plans, local planning authorities should support the expansion of telecommunications networks", but should also; "aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified." Further advice on the siting and design of telecommunications and good practice procedural guidance is contained within the Code of Best Practice for Mobile Phone Network Development (2002). This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process. As indicated above, the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any

Officer_Response:

The consideration of a policy dedicated to telecommunications is not an issue that has been dealt with directly in the Preferred Options document. As such, this represents a new option for consideration, which will be addressed in the next stage of the plan-making process.

These considerations have been taken forward in the draft Local Plan where new policies and amendments have been proposed.

Officer Recommendation:

Objection - Further work required which could result in a change to the approach.

telecommunications policy, the most important of these being NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the Strategy and Policies DPD. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against. We would suggest a policy which reads;

“Proposals for telecommunications development will be permitted provided that the following criteria are met: -

(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;

(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;

(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.

(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”

We would consider it appropriate to introduce the policy and we would suggest the following;

“Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new

telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.”

Response_Number:	229	Persons_Name:	Elizabeth Biott	Representing_Who?:	Lincolnshire Wildlife Trust
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>The Lincolnshire Wildlife Trust would like to see the following priorities included in the Infrastructure and Viability policy:</p> <ul style="list-style-type: none"> • Protection and enhancement of existing nature conservation assets, such as Local Wildlife sites, for example through the provision of natural green space around the sites to buffer them from the impacts of development and also the creation of habitat linkages to ensure that sites do not become surrounded by development and isolated from other habitats. • Creation of Biodiversity Action Plan habitats such as species rich meadows, wetlands and woodlands within a network of accessible natural green space. This would help meet targets in the UK BAP and Lincolnshire BAP • Support for landscape scale projects such as the South Lincolnshire Fenlands (www.lincsfenlands.org.uk) and the Boston Woods Trust. 	<p>The issue raised are in part addressed by the Environment Chapter of the Preferred Options Document. However, infrastructure in its entirety, including green infrastructure, 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> <p>These considerations have been taken forward in the draft Local Plan where new policies and amendments have been proposed.</p>		<p>Objection - Further work required which could result in a change to the approach.</p>		

Response_Number:

585

Persons_Name:

Mr R Doughty

Representing_Who?:

R S Earl

Respondents_Comments:

The approach is reasonable.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

586

Persons_Name:

Mr R Doughty

Representing_Who?:

R S Earl

Respondents_Comments:

The policy is supported in its current form, particularly the reference to ensuring the viability of development is not undermined.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

638

Persons_Name:

Mr R Doughty

Representing_Who?:

A W Tindall

Respondents_Comments:

The approach is reasonable.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

639

Persons_Name:

Mr R Doughty

Representing_Who?:

A W Tindall

Respondents_Comments:

The policy is supported in its current form, particularly the reference to ensuring the viability of development is not undermined.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

653

Persons_Name:

Home Builders Federation

Representing_Who?:

Their members

Respondents_Comments:

If the Local Plan is to be compliant with the NPPF, the JPU needs to satisfy the requirements of Paragraphs 173 and 174 whereby development should not be subject to such a scale of obligations and policy burdens that viability is threatened.

The Coastal Lincolnshire Economic Viability dated January 2013 by Three Dragons viability tests Boston District Council area only. At this time there is no viability assessment for the South Holland District Council area.

On sites of 3 or more units the proposed affordable housing requirement is one fifth of total dwellings in Boston District Council and one third of total dwellings in South Holland District Council. The policy may be clearer if the affordable housing provision is expressed in the more usual form as a percentage of the total housing requirement.

If the JPU has a tenure preference (social rent, affordable rent or shared ownership) for affordable housing provision, it would be helpful if this preference is stated as the tenure split of affordable housing can impact upon the financial viability of development schemes. The proposed Boston District Council affordable housing provision has been viability tested on a 70% affordable rent and 30% shared ownership split of affordable housing units with no grant subsidy in the Coastal Lincolnshire Economic Viability report.

With regards to the Coastal Lincolnshire Economic Viability, the JPU should re-consider a number of the assumptions in this report with particular reference to the document "Viability Testing Local Plans Advice for Housing Delivery Practitioners – Local Housing Delivery Group chaired by Sir John Harman (June 2012)". The Central Lincolnshire Economic Viability refers to the use of BCIS build cost figures. The BCIS build costs used are only basic build costs. As cited on page 34 of the Harman Report BCIS costs do not include external

Officer_Response:

A 'Whole Plan Viability Assessment' is currently being undertaken to cover both Boston Borough and South Holland. The results of this will inform the final drafting of the affordable housing policy, taking into account viability in the round.

These considerations have been taken forward in the draft Local Plan following Whole Plan Viability and Infrastructure Delivery Plan work.

Officer Recommendation:

Objection - Further work required which could result in a change to the approach.

structural and local site works such as roads and sewers, provision of mains services, setting out public open spaces, site abnormalities, S278 highway improvement works, sustainable urban drainage schemes, flood protection, etc. nor the communal areas for apartment developments. There is no allowance for any of these exceptional costs in the JPU's viability assessments.

Moreover the BCIS costs do not include any additional costs for the Government's proposed mandatory changes to Part L of the Building Regulations under the Zero Carbon Homes programme, which will be implementable by 2016. The BCIS figures only include costs for Code for Sustainable Homes (CfSH) Level 3. On page 26 of the Harman Report the following is stated "The one exception to the use of current costs and current values should be recognition of significant national regulatory changes to be implemented, particularly during the first five years, where these will bring a change to current costs over which the developer or local authority has little or no control. A key example of this is the forthcoming change to Building Regulations arising from the Government's zero carbon agenda".

The JPU should refer to the document "DCLG Cost of Building to CfSH Updated Cost Review 2011". Table 2 of this document shows that the cost of building to CfSH Level 5 represents an increase of between 28-31% on build costs dependant on the type of site and its location.

Likewise for the cost of building to Lifetime Homes standards, the JPU should refer to the document "The DCLG Assessing the Cost of Lifetime Homes Standards July 2012", which shows that the average additional cost for complying with the 12 criterion relating to internal specification is £1,525. There are also further additional costs associated with the remaining 4 criterion for external specifications.

Furthermore the Coastal Lincolnshire Economic Viability contains no allowance for site acquisition costs

such as land agents fees (1-2% of land value), legal fees (about 0.75%-1.5%) and stamp duty (4% of site value plus VAT for values over £500,000).

The sales and marketing costs used are set at the lowest percentage recommended by the Harman Report. A sales and Marketing cost of only 3% is unlikely in the current challenging market.

Likewise the overhead figure used is only 5% based on build cost. The Harman report recommends an overhead figure of between 5-10% based on gross development value stating that the 5% figure is only applicable to the largest national companies. Since the JPU has acknowledged that the majority of housing in South East Lincolnshire is currently delivered by small and medium sized house building companies the use of 5% overhead is inappropriate.

The viability assessments include an allowance of £7,000 for Section 106 contributions. It is unclear if the substantial cost implications of other policies contained within the Local Plan are fully accounted for. These potential additional policy costs include:-

☒ 10.18 Sustainable Transport & Accessibility preferred policy approach which states developments “will be required to” ;

☒ Spalding West Relief Road - its delivery will be linked to the phased development of housing growth to North and West of Spalding ;

☒ 9.24 Community Health & Well-being preferred policy approach including “residential development shall support the provision of new sport and open space facilities” ;

☒ Design of New Development including the mitigation of flood risk, sustainable urban drainage, enhancement of biodiversity and green infrastructure ;

☒ Climate Change & Renewable & Low Carbon Energy including the use of water conservation and recycling measures ;

☒ 8.30 Environment including the protection of biodiversity.

Finally in the Coastal Lincolnshire Economic Viability

land values are benchmarked at £360,000 per hectare. The report concludes in Paragraphs 13 and 14 that if there are any increases in costs, benchmark land values are only achievable with 10% affordable housing. The report continues in Paragraph 21 that at current house prices in Boston Sustainable Urban Extensions (SUE) are unviable with 20% affordable housing and Paragraph 23 concludes that SUEs are not a potential solution to current land supply targets.

The JPU should be mindful that it is inappropriate to set unachievable policy obligations. Under Paragraph 174 of the NPPF the JPU must properly assess viability. It is unrealistic to negotiate every site on a one by one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.

Once again the Harman report emphasises that “If the assessment indicates significant risks to delivery, it may be necessary to review the policy requirements and give priority to those that are deemed critical to development while reducing (or even removing) any requirements that are deemed discretionary. The planning authority may also consider whether allocating a larger quantity of land, or a different geographical and value mix of land, may improve the viability and deliverability of the Local Plan”. In Paragraph 154 of the NPPF states that “local plans should be aspirational but realistic”. As viability is a serious incumbent to housing delivery in Boston District Council, the JPU may have to consider revising its aspirational targets with regards to affordable housing provision, climate change and sustainability

Response_Number:

711

Persons_Name:

Tom Gilbert - Wooldridge

Representing_Who?:

English Heritage

Respondents_Comments:

The historic environment should be regarded as a relevant topic in terms of infrastructure provision (therefore the Sustainability Appraisal is incorrect to say that the plan's approach to infrastructure is neutral in paragraph 11.8.7). In terms of using planning obligations and/or CIL to fund infrastructure, although the historic environment is not mentioned explicitly by Section 216 of the Planning Act 2008 (as amended), it can form part of different infrastructure types. Roads and other transport facilities may include historic structures (such as bridges); school facilities can include historic buildings; and open/recreational spaces can contain archaeology and/or form part of the character and setting of designated heritage assets such as listed buildings and conservation areas. Heritage assets can also be described as community infrastructure in their own right (such as specific tourist attractions). The Localism Act also allows CIL to be used for maintenance and ongoing costs, which may be relevant for a range of heritage assets. Development-specific planning obligations (e.g. S106 agreements) continue to offer further opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment, such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets. Finally, the provision of new infrastructure can have impacts on the significance and setting of heritage assets, and such impacts should be considered as early as possible in the planning process.

The draft policy and/or supporting text could make reference to the historic environment issues associated with infrastructure. It would also help towards the positive strategy for the historic environment as required by the NPPF.

Officer_Response:

Infrastructure in its 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. The SA will be revisited in the next stage of the plan-making process and the comments made will be taken into account.

These considerations have been taken forward in the draft Local Plan following Whole Plan Viability and Infrastructure Delivery Plan work.

Officer Recommendation:

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

Response_Number:

714

Persons_Name:

Helen Cattle

Representing_Who?:

Sport England

Respondents_Comments:

Vision (page 18)

The acknowledgement, as part of the Vision, that new homes will be supported by necessary facilities, services and infrastructure, is welcomed and in terms of infrastructure, Sport England also confirms its broad support for the inclusion of reference to sports facility provision within the South East Lincolnshire Delivery Plan Baseline Report. However, this will clearly need to be expanded upon with full details of specific projects and the wider delivery of sports provision within the formal Infrastructure Delivery Plan (IDP) as it emerges, whilst ensuring that the IDP is fully informed by a robust and up to date assessment of needs for open space, sports and recreation facilities across the plan area (in line with Paragraph 73 of the National Planning Policy Framework).

The Sports Provision and Open Space Assessment 2012 appears to be the main source of evidence in relation to the sports related policies within the Local Plan and the emerging IDP. Whilst Sport England acknowledge that the 2012 Assessment is a relatively up to date document and contains locally specific information covering both indoor and outdoor sports facilities, it is considered that the information and associated recommendations that it incorporates will need to be reviewed and built upon in conjunction with all delivery partners, in order to provide a robust basis for the forthcoming stages of Local Plan policy development and to justify the need for funding of sports facilities, whether through CIL (if the decision is taken to have a CIL) or via other means. Sport England is concerned that without further work, there is a risk that the current evidence may not provide a sufficiently robust basis to underpin the relevant policies within the plan, and that they would not therefore meet the required tests of soundness. (Sport England has published new guidance on evidence gathering and delivering sound

Officer_Response:

Support noted. The 'Sports Provision and Open Space Assessment 2012' is considered to be up-to-date and sufficiently robust.

Officer Recommendation:

Support - No change to the approach is required.

policies – a link to which is provided at the end of this letter).

Having reviewed the document, it is noted that there appears to have been some deviation from well established methodology for carrying out such assessments, for example, only publicly accessible facilities have been included. The extent of consultation undertaken in the preparation of the documents is also unclear. Whilst it is acknowledged that surveys involving some facilities users and managers were undertaken, there does not appear to have been full consultation with or involvement of key stakeholders, including National Governing Bodies for sport and key delivery partners, in carrying out the assessment, formulating the accompanying action plan and identifying priorities. For the avoidance of doubt, I would be happy to clarify and discuss these and other specific concerns about the evidence base in more detail if you feel that this would be of assistance.

Response_Number:	719	Persons_Name:	Helen Cattle	Representing_Who?:	Sport England
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
Infrastructure and Viability (page 246) The inclusion of a policy relating to infrastructure delivery is welcomed. A robust and up to date evidence base is critical to the soundness of this policy, and comments previously made above concerning evidence base development and the content of the emerging IDP also apply to this policy. Notwithstanding that ‘sporting and recreation facilities’ are included within the definition of CIL infrastructure in the 2008 Planning Act (S.216), for the avoidance of doubt the definition for the purposes of this policy should be clarified and expressly stated to include sports facilities.	Support noted		Support - No change to the approach is required.		

Response_Number:	803	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
The approach is reasonable.		Support noted.		Support - No change to the approach is required.	

Response_Number:	804	Persons_Name:	Mr R Doughty	Representing_Who?:	Mrs Tunnard and Mrs Asprey
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
The policy is supported in its current form, particularly the reference to ensuring the viability of development is not undermined.		Support noted.		Support - No change to the approach is required.	

Response_Number:

856

Persons_Name:

Mr R Doughty

Representing_Who?:

J Wilson, S Mortimer, A & M Settlem

Respondents_Comments:

The approach is reasonable.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

857

Persons_Name:

Mr R Doughty

Representing_Who?:

J Wilson, S Mortimer, A & M Settlem

Respondents_Comments:

The policy is supported in its current form, particularly the reference to ensuring the viability of development is not undermined.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

913

Persons_Name:

Mr R Doughty

Representing_Who?:

Bovis Homes, Mr & Mrs Goodley and

Respondents_Comments:

The approach is reasonable.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

914

Persons_Name:

Mr R Doughty

Representing_Who?:

Bovis Homes, Mr & Mrs Goodley and

Respondents_Comments:

The policy is supported in its current form, particularly the reference to ensuring the viability of development is not undermined.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

972

Persons_Name:

Mr R Doughty

Representing_Who?:

Persimmon Homes

Respondents_Comments:

The approach is reasonable.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number:

973

Persons_Name:

Mr R Doughty

Representing_Who?:

Persimmon Homes

Respondents_Comments:

The policy is supported in its current form, particularly the reference to ensuring the viability of development is not undermined.

Officer_Response:

Support noted.

Officer_Recommendation:

Support - No change to the approach is required.

Response_Number: 1024

Persons_Name: Mr R Doughty

Representing_Who?: Fen Properties

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

The approach is reasonable.

Support noted.

Support - No change to the approach is required.

Response_Number: 1025

Persons_Name: Mr R Doughty

Representing_Who?: Fen Properties

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

The policy is supported in its current form, particularly the reference to ensuring the viability of development is not undermined.

Support noted.

Support - No change to the approach is required.

Response_Number: 1266

Persons_Name: Ms A Hewitson

Representing_Who?: Environment Agency

Respondents_Comments:

Q81 – What priorities for new physical, social and green infrastructure in South East Lincolnshire would you like to see included in the preferred policy approach 'Infrastructure and Viability'?

Boston Barrier

We request that the Boston Barrier is included as a priority piece of physical infrastructure, which will deliver a higher standard of flood protection to areas of Boston (including 19,700 homes and 800 businesses) as well as managing water levels through the town to allow safer navigation. It will also provide opportunities to regenerate Boston's waterways and will help achieve the Fens Waterways Link vision to connect the cathedral cities of Lincoln, Ely and Peterborough, an ambition supported by Boston's Community Plan. We request that the following text is included in the Submission Draft of the Local Plan:

The Boston Combined Strategy was approved in March 2008 and sets out proposals for a series of works needed to achieve its vision "to manage the risk from flooding in Boston whilst enabling opportunities for regenerating Boston's Waterways". The five phases are:

- ☐ New navigation link between The Haven and South Forty Foot Drain at Black Sluice;
- ☐ Improvement works to flood assets at risk of failure within Boston town centre;
- ☐ Multi-functional barrier within the Haven: dual function of partial tidal exclusion barrage for water level control to enable safe navigation and tidal surge barrier;
- ☐ Waterways facility works (moorings etc);
- ☐ Raising of embankment levels downstream of barrier at an appropriate future time.

Phases one was completed in 2008, with phase two due for completion March 2014. Phase three, construction of the multifunctional barrier and associated flood risk management assets to reduce tidal risk and provide

Officer_Response:

Infrastructure in its 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. At the present time, neither the Boston Barrier nor the Boston Distributor Road are regarded as a 'critical' pieces of infrastructure upon which the delivery of the plan is dependent.

These considerations have been taken forward in the draft Local Plan following Whole Plan Viability and Infrastructure Delivery Plan work.

These considerations have been taken forward in the draft Local Plan where new policies and amendments have been proposed.

Officer_Recommendation:

Objection - Further work required which could result in a change to the approach.

safer navigation through the town is programmed to start in 2016, subject to a successful Transport and Works Act Order application.

The existing flood defences through Boston reduce the risk of flooding to a 2.0 % (1 in 50) chance of flooding in any year from a tidal surge. Analysis has shown that approximately 800 commercial properties and 17,900 residential properties are at threat from a 0.5% (1 in 200) annual chance tidal surge.

The benefits of the barrier with its navigational link through the town will provide much needed economic regeneration for the town and wider borough. The total value of the Boston Barrier and the potential regeneration of the waterways, waterfront and the town centre, is estimated to be in excess of £100 million. Government estimates that such an investment is likely to yield a benefit to the community of at least £230 million, and potentially up to £500 million.

The government rules on funding for flood risk management capital schemes have changed, and the Environment Agency is now required to seek external contributions. This scheme has already secured £11M from Lincolnshire County Council and Boston Borough Council is committed to securing funds to maintain and operate the barrier. Further funding opportunities continue to be explored.

The barrier and associated works will reduce the tidal flood risk to a 0.33% (1 in 300) chance of flooding in any year allowing for the predicted effects of climate change and sea level rise over the next 100 years.

Transport Infrastructure

Paragraph 10.1.18 states that the Local Transport Plan „LTP3 notes that areas of land will be identified for development through the Local Plan process, ‘which will help facilitate the possibility of a distributor road to the west of Boston’“. Transport infrastructure could deliver benefits to the broad locations for development if through construction it reduces the consequence of flood risk. Broad locations for development, which are currently showing as Red, Orange and Yellow on the

hazard map may be influenced as a direct result of new transport infrastructure. Please note, any such infrastructure would not be designated as a formal flood defence.

Response_Number:

1280

Persons_Name:

Mr P Coathup

Representing_Who?:

Lincolnshire County Council

Respondents_Comments:

There is currently limited information regarding delivery and infrastructure. The majority of this information will be contained within the Infrastructure Delivery Plan (IDP) and Viability Study, both of which are being led by LCC. Once the level of required infrastructure is assessed to ensure the delivery of sustainable development, there will be a need to prioritise projects in relation to cost and viability. This will assist in deciding whether it is appropriate to adopt a Community Infrastructure Levy (CIL) and if so how much the charge should be. However, initial information suggests that a CIL (at least for South Holland) is both necessary and feasible, which would suggest a new sentence at the end of paragraph 11.6.2 as follows:

Initial information through the IDP would suggest would suggest that a CIL is necessary; viability evidence would suggest that a CIL (at least for South Holland) is viable.

The Head of Highways South Division feels that it may be appropriate to introduce a CIL. Also the views of Children's Services set out above and other LCC services will be very relevant to this decision.

LCC Children's Services have submitted a summary of likely school capacity issues for each of the key locations summarised above. Spalding is the key concern as the secondary schools are difficult to enlarge to cope with 6000 new homes, 2250 of which at Holland Park already have permission. Their proposal is a new site on the proposed urban extension of 3750 homes, to operate as an annex to an existing school. Some other locations will also require a new school or capital for expansion. Additional childcare provision will also be needed but can be located on the proposed new and expanded school sites.

Officer_Response:

This is understood. 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. The level of infrastructure required will be balanced against the viability of development proposals in the round through a 'Whole Plan Viability Assessment', which will inform the next stage of the plan-making process.

These considerations have been taken forward in the draft Local Plan following Whole Plan Viability and

Officer Recommendation:

Objection - Further work required which could result in a change to the approach.

The reference to the "Key Diagram" could be more helpful: is all critical infrastructure yet defined or shown on it? The Key Diagram itself could be improved if it showed distances to neighbouring towns such as Peterborough, Stamford and Grantham, also train stations and the main housing allocation sites.

Although the Preferred Policy Approach leaves the details to the IDP LCC Children's Services have submitted specific requirements. For school places these were submitted direct to the Joint Planning Unit; for childcare, however, they are submitted in this response for completeness.

Only in Boston, Spalding and Holbeach would there be sufficient increase in demand beyond the current spare capacity:

In Boston there would be a need to develop an additional 7 baby places (under 2's), 44 Toddler and Pre-school places (2 to 4's) and 66 out of school places (5 to 11's). As Steve is proposing a new primary school a new nursery and out of school provision could be located on the same site and another out of school provision at the school to be expanded.

In Spalding based on the assumption of 3750 new homes there would be a need to develop an additional 64 out of school places. This could be achieved by a provision on the proposed new school site and another provision located elsewhere possibly at another school site depending on capacity of the sites.

In Holbeach there would be a need to develop an additional 23 out of school places as the proposal is to expand the existing schools a new provision could be developed at one of the schools.

Response_Number:

1361

Persons_Name:

Mr J Charlesworth

Representing_Who?:

Spalding and District Civic Society

Respondents_Comments:

We cannot accept the Plan's proposed reliance on developer-funding for infrastructure and major public projects. Has this been the approach in the past, then Ascoughfee Hall and gardens would no longer exist as the "jewel in Spalding's crown" or the up-to-date physiotherapy building have been provided for the old Johnson Hospital in the 1980s – as both were the result of massive community fund-raising efforts from individuals, clubs and organisations, pubs, work groups, schools and local businesses. Again, had it been left to developers, Spalding would have no by-pass – as this was government-funded as a result in the end of intense lobbying by the Civic society, the Council and the MP at the time, after the Society had spear-headed public outrage at the destructive Inner Relief Road being proposed by County Highways and supported by the then Spalding Urban District Council. Major infrastructure should be publicly funded. To rely on developer funding means that development will be developer-led not plan-led (See also P.7 – "Town and Other Centres".)

We should like to see the whole section rewritten to remove the emphasis given to developer-funding. This should take place as merely one amongst a whole range of specified sources of funding that the local authority will pursue. After all, this is the South East Lincolnshire Local Plan for the next 18 years, not merely a short term austerity time.

Officer_Response:

This issue has been adequately addressed in the Preferred Options Document. All avenues of infrastructure funding will be explored through the Infrastructure Delivery Plan (IDP) in the next stage of the plan-making process. However, national planning policy expects local planning authorities to ensure that the cost of providing essential infrastructure to support development is at least in part met by the profits from development.

These considerations have been taken forward in the draft Local Plan following Whole Plan Viability and Infrastructure Delivery Plan work.

Officer Recommendation:

Objection - No change to the approach is required.

Response_Number: 1447

Persons_Name: Mr P Walls

Representing_Who?: Himself

Respondents_Comments:

Officer_Response:

Officer_Recommendation:

INFRASTRUCTURE AND VIABILITY

Support noted.

Support - No change to the approach is required.

Q80 Development generates a need for appropriate infrastructure, roads, schools medical facilities, community facilities, sports and leisure facilities and open spaces.

Large urban extensions demand for access to such facilities cannot just be absorbed in those that already exist and are nearest to the development site. Smaller development proposals can utilise the existing facilities without necessarily over stretching their capacity. The natural growth in a population through birth rates and longevity can generally be accommodated through gradual residential development and the capacity of public providers and commercial services cope with a gradual increase in their clients. Rapid growth in particular puts public providers under some strain. Public service providers have their own forward planning systems and should be able to predict the likely future demand for school places community nursing requirement and volume of future traffic flows. These predictable changes can be classified as organic growth and should be met out of future planned capital expenditure. It is not unreasonable to expect public as the private sector does to plan ahead how to meet needs and raise the funding. Rapid residential growth can strain existing budgets and it is not unreasonable to expect those that benefit from the rapid growth to make some contribution towards funding the provision of necessary public services the demand for which can be directly linked to the rapid residential development. However new developments should not be used to fund public infrastructure projects the need for which is not directly related to the new residential developments. The rapid growth of large urban extensions will necessitate a heavy investment in new social capital projects that will create a vibrant

participatory local community. development. Large residential developments with the appropriate facilities for building a community are unpleasant places to live in .

I am in favour of a Community Levy on all new build to provide capital for expenditure on public facilities the need for which arises directly from the new developments.

Response_Number:	1448	Persons_Name:	Mr P Walls	Representing_Who?:	Himself
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Q81 Funding for a greened field Sports Centre to meet the needs of all residents of South Holland located at the population and access by road nodal point in the general location of the Johnson Hospital.</p> <p>A new Aquatic Sports Centre in the Castle fields not funded by selling of part of the grounds for housing.</p> <p>The completion of the Spalding Wheel, a green corridor along the banks of the water courses that circumscribe the Spalding urban fabric.</p> <p>Sites identified for car parking particularly in the old northern extension zone to the east of the rail track between the station and Pinchbeck Road. A study into the merits of looping the railway to the east of the town eliminating the ' congestion problem and creating the possibility of a 'park way station to stimulate greater rail passenger services.</p>	<p>Infrastructure in its 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. This work will take into account the points made.</p> <p>These considerations have been taken forward in the draft Local Plan following Whole Plan Viability and Infrastructure Delivery Plan work.</p>		<p>Objection - Further work required which could result in a change to the approach.</p>		