

# South East Lincolnshire Local Plan 2011-2036 Preferred Options Consultation May 2013

**Chapter\_Name:** 03 Vision and Strategic Priorities

<b>Response_Number:</b> 68	<b>Persons_Name:</b> Natural England	<b>Representing_Who?:</b> Themselves
<b>Respondents_Comments:</b> Natural England broadly agrees with the vision and is pleased to note that the importance of the fenland landscape and the internationally protected wildlife habitats are recognised in the opening paragraph.	<b>Officer_Response:</b> Support noted.	<b>Officer_Recommendation:</b> Support - No change to the approach is required.

<b>Response_Number:</b> 69	<b>Persons_Name:</b> Natural England	<b>Representing_Who?:</b> Themselves
<b>Respondents_Comments:</b> We generally support the Strategic Priorities particularly those for the Environment (7, 8 & 9).	<b>Officer_Response:</b> Support noted.	<b>Officer_Recommendation:</b> Support - No change to the approach is required.

Response\_Number:

115

Persons\_Name:

Mr H Kumar

Representing\_Who?:

Peterborough City Council

Respondents\_Comments:

We welcome the Vision and the Strategic Priorities for South East Lincolnshire. In particular, the emphasis on sustainable development to meet the social and economic needs of the area.

While it is helpful to include the Sustainability Appraisal in the main document and this helps in understanding how the preferred options were derived, this does make it difficult to navigate around the document especially in electronic format. As a suggestion, it might be helpful to include the Sustainability Appraisal in a separate document and just leave the policies and their justification in the main document. This will make it easier to focus on the policies and, if required, the Sustainability Appraisal can be consulted separately

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Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

Response\_Number:

131

Persons\_Name:

Mr J S Birkett

Representing\_Who?:

Himself

Respondents\_Comments:

A statement of vision should not begin with a limiting factor (i.e. flood risk) The first Para should clearly set out the envisioned essential future of SE Lincs: its role and purpose in the County, region and country. In this case it would presumably be looking forward to playing a key role in the nation's need for food security, providing port facilities for the East Midlands etc. The statement as now formulated gives no real idea of the type of future which is being aimed at and planned for.

The first Para also tells us that the communities are to be more 'diverse'. Its hard to see how they could become more diverse than they are now - if ethnic diversity is what is being referred to. If it is some other form of diversity, then greater clarity is required.

Suggest that the Para re economic base should include strengthening the service function.

Strongly support Para re delivery of key infrastructure.

In last Para (on natural, built and historic environment), suggest insert the words 'and flood protection' after 'needs of development'. This area has some of the best agricultural land in the country, and this is likely to grow in importance in future years. Such land should not be seen as expendable (i.e. full weight should be given) where there is any scheme to adjust flood defence lines involving significant loss of agricultural

Officer\_Response:

That the comments are noted. In essence the comments ask that the Vision is amended to give local context and express what changes will occur. Some terms also require further explanation. The amendment with regard to flood protection and agricultural land is accepted.

Officer\_Recommendation:

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

Response\_Number:

132

Persons\_Name:

Mr J S Birkett

Representing\_Who?:

Himself

Respondents\_Comments:

In the full document there is a compatibility test for all these priorities. However, priority 8 has an internal tension. If the exposure to flood risk is minimised in new development, then other sustainability factors in priority 8 are aggravated. E.g. if, due to flood risk, development is diverted from the town of Boston to places such as Algarkirk, then carbon emissions will increase, as will demand for travel. So perhaps priority 8 should be split in any future compatibility test.

Officer\_Response:

Comments noted. It is agreed that there is a trade off between trying to reduce exposure to flood risk and promoting development in less sustainable locations. The Plan will need to ensure that such trade offs are not detrimental in respect of climate change.

Officer\_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response\_Number:

152

Persons\_Name:

Mr H Kumar

Representing\_Who?:

Fenland District Council

Respondents\_Comments:

We welcome the Vision and the Strategic Priorities for South East Lincolnshire. In particular, the emphasis on sustainable development to meet the social and economic needs of the area.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

<b>Response_Number:</b>	175	<b>Persons_Name:</b>	Angela Atkinson	<b>Representing_Who?:</b>	Marine Management Organisation
<b>Respondents_Comments:</b>	There are few specific references to the coast or marine environment/activities within the strategic policies. For example we believe that under SP6 'communities and wellbeing', reference could be made to enabling access to the coast as is discussed within the Marine and Coastal Access Act 2009 (MACCA).	<b>Officer_Response:</b>	This issue has been adequately addressed in the Preferred Options Document. Access to the coast, unless predominantly by the use of the private car, is limited to relatively few of the residents of South East Lincolnshire. Arguably, in the context of SP6, the improvements to health and wellbeing of local communities is likely to be delivered more effectively through access to open space and leisure in relative close proximity to where they live.	<b>Officer_Recommendation:</b>	Objection - No change to the approach is required.

<b>Response_Number:</b>	185	<b>Persons_Name:</b>	Mr G Smith	<b>Representing_Who?:</b>	Mr and Mrs Ravell
<b>Respondents_Comments:</b>	Page 18: Suggestion that the vision is made more 'interesting' to enhance understanding The vision is bland, but unobjectionable. It may be enlivened by providing: <ul style="list-style-type: none"> <li>☐ a geographical perspective</li> <li>☐ a spatial expression with, say, a key diagram of the district showing the growth areas and linkages between settlements.</li> </ul> An enhanced version of the key diagram shown on page 251 could be linked to the vision.	<b>Officer_Response:</b>	That the comments are noted. It is acknowledged that the Vision needs to provide a greater degree of local context and reference to specific outcomes.	<b>Officer_Recommendation:</b>	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

<b>Response_Number:</b>	194	<b>Persons_Name:</b>	Mr G Smith	<b>Representing_Who?:</b>	Spalding Lifestyle owners
<b>Respondents_Comments:</b>	<p>Page 18: Suggestion that the vision is made more 'interesting' to enhance understanding. The vision is bland, but unobjectionable. It may be enlivened by providing:</p> <ul style="list-style-type: none"> <li>☒ a geographical perspective</li> <li>☒ a spatial expression with, say, a key diagram of the district showing the growth areas and linkages between settlements.</li> </ul> <p>An enhanced version of the key diagram shown on page 251 could be linked to the vision.</p>	<b>Officer_Response:</b>	That the comments are noted. It is acknowledged that the Vision and Spatial Priorities need to provide a greater degree of local context and reference to specific outcomes.	<b>Officer_Recommendation:</b>	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

<b>Response_Number:</b>	215	<b>Persons_Name:</b>	Elizabeth Biott	<b>Representing_Who?:</b>	Lincolnshire Wildlife Trust
<b>Respondents_Comments:</b>	<p>The Lincolnshire Wildlife Trust welcomes the vision for a natural environment that has been protected and enhanced. However, we would recommend that the vision is expanded to say that 'the area will have an extensive network of green infrastructure, declines in biodiversity will have been reversed and key habitats and species extended through restoration and the development of ecologically coherent networks, and that all citizens will have easy access to natural green space.'</p>	<b>Officer_Response:</b>	That the comments are noted. It is acknowledged that the vision needs to provide a greater degree of local context and expected outcomes.	<b>Officer_Recommendation:</b>	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

Response\_Number:

216

Persons\_Name:

Elizabeth Biott

Representing\_Who?:

Lincolnshire Wildlife Trust

Respondents\_Comments:

#### Strategic Priority 1

The Lincolnshire Wildlife Trust welcomes SP1 to ensure that development is sustainable and will protect and enhance the environment.

#### Strategic Priority 6

The Lincolnshire Wildlife Trust would recommend adding 'natural green space' to the end of SP6. There are well documented links between health and high quality green space.

#### Strategic Priority 7

The Trust strongly supports SP7 to protect and enhance the natural environment.

#### Strategic Priority 8

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 green space. Certain elements of SUDS such as ponds can benefit both people and biodiversity by reducing the risk of flooding and providing a wildlife resource.

#### Strategic Priority 9

We would recommend that the word 'suitable' is added to SP9 before previously-developed land. Some Brownfield land may have developed a high biodiversity

Officer\_Response:

Comments noted. All comments are essentially supporting the Strategic Priorities. Reference to Strategic Priority 6 seeks the inclusion of "natural green space". It is considered that "natural green space" is represented by the term "open space" which is already included in Strategic Priority 6. Open space is a more generic term without reference to its quality or specific status. As reflected in Strategic Priority 8 "enhancing the green infrastructure network" is considered to be important and this is supported by the commentator.

Officer Recommendation:

Objection - No change to the approach is required.

interest and may not therefore be suitable for development.

#### Strategic Priority 12

The Trust supports 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 green space 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. Certain elements of SUDS such as ponds can benefit both people and biodiversity by reducing the risk of flooding and providing a wildlife resource.

Creation of habitats as part of new developments could help meet Biodiversity Action Plan (BAP) targets (UK and Lincolnshire).

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<b>Response_Number:</b>	233	<b>Persons_Name:</b>	Woods Hardwick Planning	<b>Representing_Who?:</b>	Wheatley PLC
<b>Respondents_Comments:</b>	The Vision as set out in paragraph 3.1.1 is supported and this is to be taken forward through the Strategic Priorities as set out in paragraph 3.2.1. Those Strategic Priorities are supported, with particular regard to the following key themes that are highlighted: <ul style="list-style-type: none"> <li>• Sustainable development in sustainable locations to meet the needs of the whole area; and</li> <li>• To provide employment land in appropriate locations.</li> </ul>	<b>Officer_Response:</b>	Support noted.	<b>Officer_Recommendation:</b>	Support - No change to the approach is required.

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<b>Response_Number:</b>	243	<b>Persons_Name:</b>	Jonathan Ireland	<b>Representing_Who?:</b>	Irelands Farm Machinery
<b>Respondents_Comments:</b>	Overall the vision being proposed for the area is supported. Within the context of the vision though it is important that the right opportunities exist for growth in settlements across the Borough. This is particularly important in providing the right opportunities to create employment opportunities across the Borough.	<b>Officer_Response:</b>	Comments noted. The comments would seem to support the Vision and Spatial Priorities unless the implication is that all settlements across the Borough are allowed to grow and similarly accommodate employment opportunities. This issue is adequately addressed in the Sustainable Development and Spatial Strategy chapter of the Preferred Options Document.	<b>Officer_Recommendation:</b>	Objection - No change to the approach is required.

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Response\_Number:

262

Persons\_Name:

Mr R Smith

Representing\_Who?:

Pedals

Respondents\_Comments:

Officer\_Response:

Officer\_Recommendation:

Comment 1:

There should be an additional paragraph under the heading "Our Vision for South East Lincolnshire", which should be 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 not only follows on from our criticism of the Spatial Portrait, but also provides the context for your Strategic Priority 11 (which we support in principle).

Comment 2:

In the Vision paragraph which begins "The delivery of key Infrastructure...", the phrase "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 "Highway improvements" means improvements for motorists, cyclists and pedestrians.

Comment 3:

Comments noted. These issues have been adequately addressed in the Preferred Options Document, specifically the preferred policy approach to 'Sustainable Transport and Accessibility'. It is acknowledged that the Vision and Spatial Priorities need to provide a greater degree of local context and reference to specific outcomes. That more detail is provided on access by cycling is a particular consideration.

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

We agree in principle with Strategic Priority 11.

However, some clarifications are essential:

1. "Rural areas" must be defined. The importance of the private car is only especially noteworthy in those 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 interpretation as giving particular prominence to the motor car throughout South East Lincolnshire.

2. "Highway infrastructure" must be defined in Strategic Priority 11 to include infrastructure for the benefit of motorists, cyclists and pedestrians. (See also comment 2 above.)

3. Strategic Priority 11 must make clear that improvements to the highway infrastructure to minimise congestion will include supporting the objective of facilitating a modal shift towards cycling and walking and away from the private motor car by providing a better infrastructure for safe and convenient cycling. It must not be assumed that minimising congestion will only be achieved 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 used by agricultural vehicles, pedestrians and cyclists. This good practice is unknown in Lincolnshire.

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Response\_Number:

279

Persons\_Name:

M J Smith

Representing\_Who?:

Himself

Respondents\_Comments:

I accept that the foregoing is a personal view based on the limited time of availability of the documents and my own time. What I am seeking to do is to try and persuade you that the Local Plan needs to push S.E. Lincs forward by the life of the plan PLUS the 20 years or so that the area is behind adjoining counties. In other words double the necessary work.

Just one thought. The area is low, barely above Sea Level. It is prone to droughts and some road routes are tortuous. Go to Holland and France and see how they used tidal power generation within flood defences carrying roads. Add in a capacity for desalination, jobs solved. Unfortunately that thinking is just too much I fear for all the dysfunctional organisations involved. There are 3 if not 4 tidal outlets to the Wash where tides flood and ebb twice a day. Hydro generation is a winner over wind.

Officer\_Response:

Comments noted. The ambition of the Local Plan is limited by existing economic capacity and policy decision making at the national level. Whilst many of the challenges and opportunities are acknowledged as being relevant to South East Lincolnshire, a Local Plan, written to realise these outcomes would not be sound as it would not be deliverable.

Officer\_Recommendation:

Objection - No change to the approach is required.

Response\_Number:

317

Persons\_Name:

Mr Neil Osborn

Representing\_Who?:

Larkfleet Homes

Respondents\_Comments:

We broadly SUPPORT the Vision for South East Lincolnshire for the following points:

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

Firstly with reference to the economic base of the area, whilst we acknowledge and support the need to strengthen existing businesses and provide new opportunities that will build upon current strengths in food production, processing and distribution, we consider that economic prosperity is equally dependent on strengthening other sectors through rural diversity, supporting and developing the service industries and above all by further diversifying the economic base. This will require positive approaches to other aspects of spatial and economic planning policy, not least in ensuring that there are sufficient new homes provided where they are needed and with a sufficiently broad range of house types to meet all sectors of demand.

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Response\_Number:

318

Persons\_Name:

Mr Neil Osborn

Representing\_Who?:

Larkfleet Homes

Respondents\_Comments:

In terms of specific Strategic Priorities we OBJECT to the statement in Clause 3 that the Policy will be:

To seek to meet the housing needs of the whole of South East Lincolnshire's population, including the provision of an appropriate proportion of affordable housing for those in need.

Clause 3 should recognise the inflow of population that has arisen from the development of the food industry sector, should seek to make sure that it provides sufficient housing for all those who need it and that it has regard to the Duty to Co-operate in relation to the housing needs of those areas with which it has a functional and economic relationship – important where the SHMA covers Authority areas outside and beyond the area of the Joint Local Plan. Specifically it should also seek to ensure that sufficient housing is provided to support the expansion and in particular the diversification of the economy. Clause 3 should be redrafted to state:

To seek to meet the housing needs of all of those who aspire to live in South East Lincolnshire, including the provision of an appropriate proportion of affordable housing for those in housing need.

We also believe that it is important that smaller and rural communities remain viable and attractive places to live. The viability of rural communities is an issue that bears upon both housing and economic policy and we consider that it is important that life continues to be breathed into such communities through progressive albeit comparatively modest opportunities to expand and develop businesses and provide housing that the local population needs. Policies that seek to prevent housing taking place in smaller communities will ultimately cause them irreparable damage which would of itself be unsustainable.

We suggest that Clause 6 is redrafted to state:

To seek to improve the quality of life for everyone who

Officer\_Response:

Comments noted. It is acknowledged that Spatial Priority 3 in stating "...whole of South East Lincolnshire's population....." may imply the existing population and not what changes to the population may occur have not been considered. The suggested amendment to include the term "aspire to live" is difficult to quantify. Further work is required on considering housing need and amendments to Spatial Priority 3 may be required. Part of the comment is also with regard to the duty to co-operate and it is acknowledged that the opportunities for meeting housing need in the two SHMA areas has yet to be fully explored. This is because the first step of the Plan was to ascertain the level of agreement with regard to the broad housing need numbers and the most appropriate strategy to meet them. The amendment to Spatial Priority 6 to include reference to growth in "all communities" Is not considered to be sustainable. Many places within South East Lincolnshire currently do not support any community facilities. However a number may support people who work from home. New houses in such settlements are unlikely to bring about new community facilities or provide significantly more support for existing businesses.

Officer Recommendation:

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

lives, visits, works and invests in South East Lincolnshire by providing sufficient homes, employment, retail, education, healthcare, community and leisure facilities, and open space in all communities.

Response_Number:	428	Persons_Name:	Crowland Parish Council	Representing_Who?:	Themselves
Respondents_Comments:	Officer_Response:		Officer_Recommendation:		
<p>Vision is directionally ok. However, Crowland is not significantly involved in the food processing industry (other than farming). Therefore we would like to see support for an expansion of light industry, professional services and leisure employment, not directly connected with food. Peterborough has traditionally been strong in manufacturing, and more recently professional services, and we see our close proximity to and good road connections with Peterborough creating "satellite" opportunities here. Also, as a key main Service Centre (and the only one in the south of the region), we would like to see clarity on how we can stop/reverse the loss of key infrastructure such as secondary education. County-level strategic decisions appear to largely ignore the infrastructure needs of viable Service Centres.</p> <p>Strategy priorities are rather generic, and therefore largely uncontroversial; not necessarily a good thing. There is some weakness in applying these "grand aspirations" to our locality, however. For example multi modal travel. There is, of course, a big challenge in making everyone happier/healthier/richer, notwithstanding the benefits. We look forward to the later stages of the process which presumably outline specific action plans to deliver the vision in our community.</p>	<p>Comments noted. The Vision does highlight the importance of food production for South East Lincolnshire but not to the exclusion of other business. "...supporting existing businesses....." and "delivery of.....employment opportunities"....are stated as part of the vision which is irrespective of the type of business. Furthermore Strategic Priority 4 supports the need to "strengthen and diversify the economic base of South East Lincolnshire". It is acknowledged that the Vision and Spatial Priorities need to provide a greater degree of local context and reference to specific outcomes.</p>		<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>		

Response\_Number:

539

Persons\_Name:

Mr R Doughty

Representing\_Who?:

R S Earl

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

540

Persons\_Name:

Mr R Doughty

Representing\_Who?:

R S Earl

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

541

Persons\_Name:

Mr R Doughty

Representing\_Who?:

R S Earl

Respondents\_Comments:

The Strategy Priorities appear to identify the key planning issues.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

542

Persons\_Name:

Mr R Doughty

Representing\_Who?:

R S Earl

Respondents\_Comments:

We would not suggest any change.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

591

Persons\_Name:

Mr R Doughty

Representing\_Who?:

A W Tindall

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

592

Persons\_Name:

Mr R Doughty

Representing\_Who?:

A W Tindall

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

593

Persons\_Name:

Mr R Doughty

Representing\_Who?:

A W Tindall

Respondents\_Comments:

The Strategy Priorities appear to identify the key planning issues.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

594

Persons\_Name:

Mr R Doughty

Representing\_Who?:

A W Tindall

Respondents\_Comments:

We would not suggest any change.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

642

Persons\_Name:

Graham Warren Ltd

Representing\_Who?:

Broadgate Homes Ltd

Respondents\_Comments:

The overall Vision for South East Lincolnshire (3.1.1) could apply anywhere. It needs to be more specific in respect of where houses will be constructed, what infrastructure will be provided and when, identify what fundamental challenges the area faces and how the Plan intends to address them.

Officer\_Response:

That the comments are noted. It is accepted that the vision lacks a local context.

Officer\_Recommendation:

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

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Response\_Number:

650

Persons\_Name:

Graham Warren Ltd

Representing\_Who?:

Broadgate Homes Ltd

Respondents\_Comments:

Section 19(5) of the 2004 Act, requires a Local planning Authority to carry out an appraisal of the sustainability of the proposals in Development Plan documents and prepare a report of the findings of that appraisal, i.e. an SA, itself a Development Plan document.

This arises from EU Directive 2001.42/EC, the provisions of which have been incorporated into domestic law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 1633).

Regulation 12 provides that:

1. Where an environmental assessment is required by any of Part 2 of these regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs 2 and 3 of this regulation.
2. The report shall identify, describe and evaluate the likely significant effects on the environment of:
  - a. Implementing the plan or programme; and
  - b. Reasonable alternatives, taking into account the objectives and geographical scope of the plan or programme

Guidance on implementation of Directive has been issued by the European Commission. Paragraph 1.5 of the Guidance makes it clear that it represents only the views of the Commission and is not of a binding nature. As Ousley J commented in *Heard v Broadland DC* ("012) EWHC (Admin) at paragraph 69, the Guidance is not a source of law.

The Guidance states at Para 5.12, that in requiring the likely significant effects of reasonable alternatives to be identified, described and evaluated, the Directive makes no distinction between the assessment requirements for the drafted plan or programme and

Officer\_Response:

Support noted.

Officer Recommendation:

Support - No change to the approach is required.

for the alternatives.

The SA properly examines the preferred options and has similarly considered alternatives. However, consideration of the impact on those areas set out in the SA, is an iterative process and particularly as the draft Plan states at 1.7.1, that representations are welcomed where it is felt that other reasonable options have not been explored.

Any other options proposed for consideration, will need to be the subject of an assessment based on the established topics set out in paragraph 1.4.4 of the Plan. In the same way, refinement of proposals for preferred sites will also bear on their sustainability, which may need further consideration in the SA. A Statement to this effect needs to appear in the Plan, so as to assist, in due course, its soundness.

The Plan needs to recognise and make clear that the assessment of policies and proposals in the Sustainability Appraisal is an iterative process. The refinement of proposals for preferred sites and other options will also bear on their sustainability, which may need further consideration in the SA, e.g. Area B9 at Boston.

The integration of the SA with the preferred policy options is welcomed and should be carried over into the submission revision of the Strategy and Policies Development Plan Document.

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<b>Response_Number:</b>	658	<b>Persons_Name:</b>	Cllr A Austin	<b>Representing_Who?:</b>	Herself
<b>Respondents_Comments:</b>	<p>Although there is nothing that can be objected to in either the Vision or Strategic Priorities, the statements are somewhat bland and lacking in ambition and creativity.</p> <p>Flood risk will be referred to again under section 4 but should not be used as a blanket ban on all future development in certain areas of ROY zones. In a similar way, the current economic situation should not be allowed to limit the vision for South East Lincolnshire for future years.</p>	<b>Officer_Response:</b>	<p>Comments noted. It is acknowledged that the Vision and Spatial Priorities need to provide a greater degree of local context and reference to specific outcomes. In respect of flood risk and the current economic climate. The Plan does not seek to take an approach of complete restraint in respect of either of these factors, but, in the current context, what the Plan can be expected to deliver is limited and it is necessary to provide evidence with this regard and give it due consideration.</p>	<b>Officer_Recommendation:</b>	<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>

<b>Response_Number:</b>	659	<b>Persons_Name:</b>	Cllr A Austin	<b>Representing_Who?:</b>	Herself
<b>Respondents_Comments:</b>	<p>Table 3.1 states that there is no link between improving traffic congestion and the economy and employment. I see this as a definite error and consider that there is a strong positive correlation between minimizing traffic congestion and improving the local economy.</p> <p>Traffic congestion, whether real or perceived, is a deterrent to new businesses moving to the area – Boston in particular – and also a cause of existing businesses relocating elsewhere. The latter situation can result in lost employment.</p>	<b>Officer_Response:</b>	<p>Comments noted. As the Transport Strategic Priority 11 states that it will aid economic development it is clearly inaccurate to record a neutral impact upon the Economy in Table 3.1.</p>	<b>Officer_Recommendation:</b>	<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>

Response\_Number:

686

Persons\_Name:

Tom Gilbert - Wooldridge

Representing\_Who?:

English Heritage

Respondents\_Comments:

In the first paragraph of the vision, while it is true to say that South East Lincolnshire has many locally distinctive historic market towns and villages, the wider countryside also contains many heritage assets (both designated and undesignated). The vast majority of the fenland landscape is shaped by human activity, with many traces of previous activities from the prehistoric through to the modern era. The Historic Landscape Characterisation for Lincolnshire (an evidence base document for this plan) provides more detail on this issue. In the final paragraph, it is unclear why the phrase "where appropriate" is used after the statement that "the natural, built and historic environment will have been protected and enhanced". It implies that the protection and enhancement of the environment is optional, when it should be the starting point for considering any planning proposal. It could also be argued that it may not be appropriate or desirable to 'enhance' every part of the environment (e.g. some archaeological or ecological sites are better off being left alone), but given that this is the vision for the Local Plan, it needs to be worded in a more ambitious and aspirational way.

Officer\_Response:

Comments noted. The broader archaeological importance of the area is captured in the term "historic environment" as stated in the final paragraph of the vision. It is acknowledged that "where appropriate" is unnecessarily circumspect in the context of the vision. It is acknowledged that the Vision and Spatial Priorities need to provide a greater degree of local context and reference to specific outcomes.

Officer Recommendation:

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



<u>Response_Number:</u>	687	<u>Persons_Name:</u>	Tom Gilbert - Wooldridge	<u>Representing_Who?:</u>	English Heritage
<u>Respondents_Comments:</u>					
We welcome a strategic priority relating to the historic environment (no. 7), but as with the vision, we question the use of the phrase “where appropriate”. Priority 1 is also welcomed in relation to sustainable development, while Priority 4 is useful in terms of its reference to the historic environment and tourism (provided that heritage assets are used appropriately and their conservation is not overruled by economic objectives).	<u>Officer_Response:</u>				
	Comments noted. Stating "where appropriate" in Strategic Priority 7 is considered necessary because not all natural, built and historic environments are afforded the same levels of importance and statutory weight. Without some additional statement to provide the context for such levels of importance and statutory weight the Strategic Priority would not be achievable across the board.	<u>Officer_Recommendation:</u>			
		Objection - No change to the approach is required.			

<u>Response_Number:</u>	688	<u>Persons_Name:</u>	Tom Gilbert - Wooldridge	<u>Representing_Who?:</u>	English Heritage
<u>Respondents_Comments:</u>					
With regards to Table 3.1 and the compatibility of the Strategic Priorities and Sustainability Appraisal Topics, we feel that there is a relationship between the historic environment (SA Topic G) and Priorities 3, 4, 6, 8, 10, 11 and 12. Them provision of housing, economic development, community facilities, climate change measures, transport schemes and other infrastructure are all relevant to the historic environment in terms of potentially benefiting or harming heritage assets. The same could be said when assessing Priority 7 against SA Topics A, E, F and H.	<u>Officer_Response:</u>				
	Comments noted. The comments note potential benefits or harm could result however the thrust of Strategic Priority 7 is to protect and enhance, where appropriate, the historic environment. It seems a fair judgement to conclude that, in the absence of site specific evidence, that a clear link is difficult to establish. Similarly it would be difficult to conclude that, in all cases, compatibility could be assessed. However, the policy delivery mechanism for the historic environment will be key and the sustainability assessment of the amended plan policy will be more significant.	<u>Officer_Recommendation:</u>			
		Objection - No change to the approach is required.			

<b>Response_Number:</b>	715	<b>Persons_Name:</b>	Helen Cattle	<b>Representing_Who?:</b>	Sport England
<b>Respondents_Comments:</b>	<b>Officer_Response:</b>		<b>Officer_Recommendation:</b>		
Strategic Priorities (page 19) The general thrust of Strategic Priority 6 concerning Communities, Health and Well-being is supported, although for clarity it is considered that sports and recreational provision should be expressly referenced in addition to the facilities already cited. Strategic Priority 12 that relates to the delivery of necessary infrastructure is broadly welcomed, and the comments made above in connection with the Vision are also judged to be relevant to this Priority, given the importance of establishing a robust and up to date understanding of locally specific infrastructure needs.	Comments noted. Strategic Priority 6 includes reference to "leisure facilities and open space" which would include "sports and recreation provision". Furthermore, the preferred policy approach 'Community, Health and Well-Being' makes specific reference to sports provision.		Objection - No change to the approach is required.		

<b>Response_Number:</b>	730	<b>Persons_Name:</b>	Carter Jonas	<b>Representing_Who?:</b>	RP Worth and Son
<b>Respondents_Comments:</b>	<b>Officer_Response:</b>		<b>Officer_Recommendation:</b>		
The identification of the importance of achieving sustainable development and meeting the housing needs of the whole of South East Lincolnshire is supported. The aims of achieving a distribution and delivery of development in sustainable locations is actively encouraged, and is supported by the policies included within the National Planning Policy Framework.	Support noted.		Support - No change to the approach is required.		

Response\_Number:

754

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Mrs Tunnard and Mrs Asprey

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

755

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Mrs Tunnard and Mrs Asprey

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

756

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Mrs Tunnard and Mrs Asprey

Respondents\_Comments:

The Strategy Priorities appear to identify the key planning issues.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

757

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Mrs Tunnard and Mrs Asprey

Respondents\_Comments:

We would not suggest any change.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

809

Persons\_Name:

Mr R Doughty

Representing\_Who?:

J Wilson, S Mortimer, A & M Settlem

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

810

Persons\_Name:

Mr R Doughty

Representing\_Who?:

J Wilson, S Mortimer, A & M Settlem

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

811

Persons\_Name:

Mr R Doughty

Representing\_Who?:

J Wilson, S Mortimer, A & M Settlem

Respondents\_Comments:

The Strategy Priorities appear to identify the key planning issues.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

812

Persons\_Name:

Mr R Doughty

Representing\_Who?:

J Wilson, S Mortimer, A & M Settlem

Respondents\_Comments:

We would not suggest any change.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

862

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Bovis Homes, Mr & Mrs Goodley and

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

863

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Bovis Homes, Mr & Mrs Goodley and

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

864

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Bovis Homes, Mr & Mrs Goodley and

Respondents\_Comments:

The Strategy Priorities appear to identify the key planning issues.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

865

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Bovis Homes, Mr & Mrs Goodley and

Respondents\_Comments:

We would not suggest any change.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

919

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Persimmon Homes

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

920

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Persimmon Homes

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

921

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Persimmon Homes

Respondents\_Comments:

The Strategy Priorities appear to identify the key planning issues.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

922

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Persimmon Homes

Respondents\_Comments:

We would not suggest any change.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

979

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Fen Properties

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

980

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Fen Properties

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

981

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Fen Properties

Respondents\_Comments:

The Strategy Priorities appear to identify the key planning issues.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

982

Persons\_Name:

Mr R Doughty

Representing\_Who?:

Fen Properties

Respondents\_Comments:

We would not suggest any change.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

1029

Persons\_Name:

Mr R Doughty

Representing\_Who?:

K Enderby

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

---

Response\_Number:

1030

Persons\_Name:

Mr R Doughty

Representing\_Who?:

K Enderby

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

1031

Persons\_Name:

Mr R Doughty

Representing\_Who?:

K Enderby

Respondents\_Comments:

The Strategy Priorities appear to identify the key planning issues.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number:

1032

Persons\_Name:

Mr R Doughty

Representing\_Who?:

K Enderby

Respondents\_Comments:

We would not suggest any change.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number: 1049

Persons\_Name: Mr R Doughty

Representing\_Who?: Richard Pearson Ltd

Respondents\_Comments:

It is agreed that the Vision is specific, local, ambitious and realistic insofar as it seeks to deliver housing for the existing population and attract employment.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number: 1050

Persons\_Name: Mr R Doughty

Representing\_Who?: Richard Pearson Ltd

Respondents\_Comments:

The Strategic Priorities are consistent with the Vision.

Officer\_Response:

Support noted.

Officer\_Recommendation:

Support - No change to the approach is required.

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Response\_Number: 1051

Persons\_Name: Mr R Doughty

Representing\_Who?: Richard Pearson Ltd

Respondents\_Comments:

Officer\_Response:

Officer\_Recommendation:

The Strategy Priorities appear to identify the key planning issues.

Support noted.

Support - No change to the approach is required.

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Response\_Number: 1052

Persons\_Name: Mr R Doughty

Representing\_Who?: Richard Pearson Ltd

Respondents\_Comments:

Officer\_Response:

Officer\_Recommendation:

We would not suggest any change.

Support noted.

Support - No change to the approach is required.

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<b>Response_Number:</b>	1160	<b>Persons_Name:</b>	Mrs J Dean	<b>Representing_Who?:</b>	Anglian Water
<b>Respondents_Comments:</b>	We support the inclusion of point 8 of the Strategic Priorities for South East Lincolnshire, however suggest the reference to 'promoting energy efficiency' should read 'promoting resource efficiency' to ensure water efficiency is included.	<b>Officer_Response:</b>	Comments noted. Reference to resource efficiency is important but the term "resource" is not considered to also encompass "energy"	<b>Officer_Recommendation:</b>	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

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<b>Response_Number:</b>	1181	<b>Persons_Name:</b>	Angela Newton	<b>Representing_Who?:</b>	Mr J and Mr G Eyett
<b>Respondents_Comments:</b>	Yes	<b>Officer_Response:</b>	Support noted.	<b>Officer_Recommendation:</b>	Support - No change to the approach is required.

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Response_Number:	1182	Persons_Name:	Angela Newton	Representing_Who?:	Mr J and Mr G Eyett
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
Yes		Support noted.		Support - No change to the approach is required.	

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Response_Number:	1183	Persons_Name:	Angela Newton	Representing_Who?:	Mr J and Mr G Eyett
Respondents_Comments:		Officer_Response:		Officer_Recommendation:	
Yes		Support noted.		Support - No change to the approach is required.	

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Response\_Number:

1224

Persons\_Name:

Mr J Brown

Representing\_Who?:

Ambrose Lighton

Respondents\_Comments:

Q3 - Is the Vision specific, local, ambitious and realistic?

Overall we are supportive of the Vision for South East Lincolnshire. The Vision must also, however, reflect the realistic pressures from inward migration in the Boston Borough. Growth should also be allowed to take place in the most sustainable locations provided that flood risk can be appropriately mitigated. Failure to address these key aspects would mean that the Vision did not meet the twin objectives of being 'ambitious' and 'realistic'.

It is also important to note that whilst coastal flooding is clearly a pivotal issue in framing the Vision for the area, it needs to be weighed against the other equally important objectives to deliver necessary growth and economic development. The issue of coastal flooding should not take automatic precedence over all other issues which have to be addressed by the Plan and nor should it lead to an unsustainable pattern of growth.

The Vision should also clearly reflect the Baseline Settlement Hierarchy set out at paragraph 5.2.5 which recognises Kirton's key role as a Main Service Centre.

Officer\_Response:

Most of the comments seem to support the vision and are more about the application of policy providing the right balance in respect of achieving levels of growth in a sustainable manner. The issues raised are adequately addressed in the Preferred Options Document, specifically in the 'Housing Growth and Flood Risk' chapter.

Officer Recommendation:

Objection - No change to the approach is required.

Response\_Number:

1225

Persons\_Name:

Mr J Brown

Representing\_Who?:

Ambrose Lighton

Respondents\_Comments:

Q4 - Do the Strategic Priorities relate well to the Vision?

Overall the Strategic Priorities relate well to, and appropriately expand upon, the Vision. However, whilst climate change and flood risk are important considerations, growth should not be completely excluded from areas of potential future flood risk if measures could be implemented to appropriately mitigate the risk. Equally, areas outside of the defined ROY zones should not be proposed for a level of growth which would be out of step with what is realistically achievable and sustainably deliverable. To do so would be in conflict with Strategic Priorities 1 (Sustainable Development) and 3 (Housing) will be undermined.

Officer\_Response:

The comments support the approach but implicitly suggest that some flexibility with regard to development both inside and outside ROY zones needs to be taken in order to realise sustainable development. This issue is adequately addressed in the Preferred Options Document, specifically the 'Housing Growth and Flood Risk' chapter.

Officer\_Recommendation:

Objection - No change to the approach is required.

Response\_Number:

1226

Persons\_Name:

Mr J Brown

Representing\_Who?:

Ambrose Lighton

Respondents\_Comments:

Q5 and Q6 - Do the Strategic Priorities identify all the key planning issues facing South East Lincolnshire? What changes to the Vision and/or the Strategic Priorities, if any, would you suggest?

The Strategic Priorities must reflect the economic realities of developing within South East Lincolnshire and provide a favourable and flexible framework to encourage the construction of new housing. The ability in the short term for the private sector to bear the additional cost of major infrastructure and affordable housing is likely to be limited. It is, therefore, essential that policies are sufficiently flexible to allow site specific negotiations in order to ensure that development remains commercially viable and can be delivered. This will be particularly relevant in locations where flood mitigation works will be required.

The identification of medium and large scale edge of centre greenfield sites is more likely to enable the delivery of new infrastructure and community facilities through improved economies of scale. Larger schemes will also generate a need for new shops, services and facilities which will also benefit existing communities and which in some instances can enable cross subsidy of housing development. It is imperative that the Council's policies on retail, the economy and community facilities are sufficiently flexible to enable such opportunities to come forward.

The Plan should not put up artificial barriers to the delivery of housing within the sub regional and Main Service Centres as it is these areas which will be first to recover when economic conditions improve.

Housing needs should not be just those of the existing population but should reflect wider growth trends,

Officer\_Response:

The comments seem to recognise a need for a sustainable approach to development and is largely a commentary on the need to operate policies flexibly. The comments do not indicate that the approach of the Vision and Strategic priorities is considered to be incorrect. The issues raised by these comments are adequately addressed in the Preferred Options Document.

Officer Recommendation:

Objection - No change to the approach is required.

including realistic pressures from inward migration. This is particularly important in areas such as Boston which have seen a significant growth in population in recent years.

It is of course important for new development to contribute to the necessary physical, social and green infrastructure where it is economically possible to do so. In general new infrastructure, services and facilities are likely to be more readily deliverable on greenfield sites, albeit policies should retain sufficient flexibility to ensure that wider burdens on development do not render schemes unviable.

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Response\_Number:

1251

Persons\_Name:

Ms A Hewitson

Representing\_Who?:

Environment Agency

Respondents\_Comments:

Q5 – Do the Strategic Priorities identify all the key planning issues facing South East Lincolnshire? We note in paragraph 2.4 of the Spatial Portrait that “the Plan area attracts some 14,000 seasonal workers in horticulture and crop processing annually”. This is a significant population, particularly in terms of housing requirements, and we would have thought that the plan should highlight this issue and include a Policy Approach. We would suggest that the need for a Policy Approach is given consideration, similar to that for gypsies, travellers and travelling show people, which appears to be a much less significant issue for the area but has warranted a Policy Approach.

Officer\_Response:

Comments noted. The consideration of a policy dedicated to seasonal migrant workers is not an issue that has been addressed directly in the Preferred Options Document. As such this represents a new option for consideration which will be dealt with accordingly in the next stage of the plan-making process. The seasonal workers reference provided in the Spatial Portrait is there to emphasize the importance of the horticultural industry and the seasonal impact upon population levels and services. It is understood that such seasonal impacts have been experienced for decades. The impacts upon housing provision are not known and there is no evidence over the years of any specific requirements or demand for temporary accommodation, enforcement cases etc. That would demand a specific policy approach. It is expected that at least part of the housing needs of seasonal migrant workers will be reflected in the census returns. The Plan's housing provision section considers how such growth can be provided for by that Policy Approach. The Policy approach for gypsies, travellers and travelling show people is a statutory requirement due to the specific needs and complexities of site provision in respect of meeting their housing needs.

Officer\_Recommendation:

These considerations have been taken forward in the draft Local Plan and are also evidenced in the supporting papers e.g. SHLAA and Housing Papers.

Response\_Number:

1252

Persons\_Name:

Ms A Hewitson

Representing\_Who?:

Environment Agency

Respondents\_Comments:

We support the recognition that the challenges of climate change are a strategic priority for the District Councils. We fully support the need to ensure that development, particularly housing development, takes account of flood risk when making decisions on its location and design in order to minimise and mitigate the risks, which will increase over the plan period (and in the long-term) as a result of climate change (increased river flows, more intense rainfall and sea level rise). However, we suggest that the vision could be improved by including a clearer direction on the aspirations for reducing the number of people at high risk within flood hazard areas. We suggest that the first paragraph of the Vision for South East Lincolnshire is amended to read:

“By 2031 South East Lincolnshire's settlements and rural hinterland will have developed in response to the challenges of climate change, and particularly in respect of flood risk concerns, to have by reducing the number of people at risk of flood hazard whilst growing in a more sustainable manner to provide more diverse prosperous, resilient and self-sustaining communities”.

Officer\_Response:

Comments noted. Whilst the thrust of the comments is supported it is a question of how the reduction in the number of people at risk of flood hazard can both be managed and can also result in more sustainable development. As has been indicated in the Census, significant population growth has occurred in the Plan area which has clearly increased the numbers of people living in flood hazard areas. Whilst it is uncertain whether the growth levels will continue it is uncertain, even with the planned housing growth coming to fruition, what impact can be exerted upon the number of people living in flood hazard areas. The Plan proposes comparably reduced growth in areas of flood risk but this does not ensure a reduced number of residents.

Officer\_Recommendation:

Objection - No change to the approach is required.



<b>Response_Number:</b>	1267	<b>Persons_Name:</b>	Ms A Hewitson	<b>Representing_Who?:</b>	Environment Agency
<b>Respondents_Comments:</b>	<p>Sustainability Appraisal</p> <p>In addition to the above answers to the specific questions raised by the consultation we would also make the following observations about the Sustainability Appraisal, which is integrated with the options appraisal:</p> <p>Table 3.1 - The compatibility testing of Strategic Priorities and the Sustainability Appraisal (SA) topics would benefit from further explanatory text, in particular to explain the areas of non compatibility within this section. We have tried to cross reference this table to the relevant chapters but there appears to be a lack of correlation in some areas. For example, Strategic Priority 4 (relating to the economy) is assessed as potentially in conflict with SA issue H (Housing). Turning to the Economy Chapter all options are assessed as having either a neutral or minor positive impact on housing. All the options in the Housing Chapter are similarly assessed as having a minor positive impact on the economy. We are therefore unsure as to why Table 3.1 shows these issues as potentially in conflict?</p>	<b>Officer_Response:</b>	<p>Comments noted. The key difference between the assessments in the individual chapters and the assessment in the Strategic Priorities Appraisal is that both the Housing and Economy chapters have a greater degree of spatial and quantitative context therefore the assessments are, to a degree, more sophisticated. The Spatial Priorities are broad statements. It is acknowledged that when the Local Plan is amended and a separate Sustainability Appraisal is provided a greater degree of explanation will be possible that will reflect the more specific and focussed context provided by the amended plan.</p>	<b>Officer_Recommendation:</b>	<p>Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).</p>

<b>Response_Number:</b>	1274	<b>Persons_Name:</b>	Mr P Coathup	<b>Representing_Who?:</b>	Lincolnshire County Council
<b>Respondents_Comments:</b>	<p>SECTION 3: Vision and Strategic Priorities</p> <p>The document could make reference to the relationship that the SEL area has with neighbouring authority areas. For example the volume of residents in South Holland that travel to Peterborough for work and leisure purposes will have an impact on transport provision and employment land requirements.</p>	<b>Officer_Response:</b>	<p>Comments noted. Whilst the relationship to neighbouring areas is acknowledged the purpose of the Vision and Strategic Priorities chapter is not to reflect such factors. The Spatial Priorities seek to improve accessibility to jobs and promote sustainable patterns of development. It is within the detailed sections of the Plan that the relationship to neighbouring areas will have an impact.</p>	<b>Officer_Recommendation:</b>	<p>Objection - No change to the approach is required.</p>

<b>Response_Number:</b>	1294	<b>Persons_Name:</b>	Mr J Charlesworth	<b>Representing_Who?:</b>	Spalding and District Civic Society
<b>Respondents_Comments:</b>	Question 3 – No. the cumulative impression is that life is all about economics and flood risk. A major aim surely is to support communities that will enable people to live healthy, fulfilled creative lives.	<b>Officer_Response:</b>	These issues are adequately addressed in the Preferred Options Document. It is considered that a very narrow interpretation of the vision has been taken. The Vision refers to "...diverse, prosperous, resilient and self-sustaining communities". The provision of housing and environments that meet the needs of the whole population are also referenced. Furthermore the Vision is supported by Strategic Priorities that promote community, health and wellbeing etc.	<b>Officer_Recommendation:</b>	Objection - No change to the approach is required.

<b>Response_Number:</b>	1295	<b>Persons_Name:</b>	Mr J Charlesworth	<b>Representing_Who?:</b>	Spalding and District Civic Society
<b>Respondents_Comments:</b>	Question 4 – Only if the changes suggested in response to question 6 are made	<b>Officer_Response:</b>	Comment noted. Please refer to response number 1297.	<b>Officer_Recommendation:</b>	Objection - A minor change to the approach may be required (e.g. detailed policy wording/SA scoring).

Response\_Number:

1296

Persons\_Name:

Mr J Charlesworth

Representing\_Who?:

Spalding and District Civic Society

Respondents\_Comments:

Question 5 – Yes if the changes suggested in response to question 6 are made

Officer\_Response:

Comments noted. Please see response number 1297.

Officer\_Recommendation:

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

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Response\_Number:

1297

Persons\_Name:

Mr J Charlesworth

Representing\_Who?:

Spalding and District Civic Society

Respondents\_Comments:

Question 6 – P.18, Blue Box, Para. 2 of ‘our Vision’ – Add at the end “thereby enabling people to live healthy, fulfilled and creative lives.”  
Para. 5 First sentence – Strengthen. Delete “where appropriate”. (in any case, the sentence is ambiguous. At the very least, “where appropriate” needs to come before “enhanced”  
Pp. 19-20 Blue Box Para. 6 – Add at end “thereby enabling people to live healthy, fulfilled and creative lives”  
Para. 7 – Ambiguous as before. Transfer “where appropriate” to before “enhance”.  
Para. 11 – Paragraph self-contradictory. If the aim is to discourage car use, then improving highways and removing congestion will only increase it! The whole paragraph need sorting out. There are two different aims here: a) promoting a change from car use to cycling, walking and public transport, b) improving highways to make car use safer and more efficient. Measures taken to achieve one will not achieve the other. At the same time as resolving the contradictory phrasing, and statement about improving highway infrastructure should include: “in particular segregated cycle tracks”

Officer\_Response:

Comments noted. The specific addition of reference "to healthy, fulfilled and creative lives" is not supported. Being "fulfilled and creative" are somewhat subjective and impossible to measure. It is, however, acknowledged that the existing terminology in the Vision statement is also subjective.  
Amendments to the statement with regard to the natural, built and historic environment to swap the terms "enhanced" and "where appropriate" over is considered unnecessary. "Protect and enhance" are terms found together in the legislation. In response to no. 686 it is acknowledged that, given the further context provided in the statement the terms "where appropriate" could be deleted. Spatial Priority 6 - reference "to fulfilled and creative lives" is considered too subjective. The Priority does include "quality of life" which is felt to be more encompassing and could be objectively measured. Spatial Priority 7 - the juxtaposition of "enhanced" and "where appropriate" is not considered necessary for reasons stated above. Inclusion of "where appropriate" in this case is to be kept as the statements does not provide additional context for the inherent qualities of the attributes (as within the Vision statement). It is acknowledged that to achieve the aims of Spatial Priority 11 requires trade-offs and that is why the statement uses relative terms such as "maximise the potential". The Plan has yet to identify monitoring criteria by which to measure such relative outcomes. The incorporation of "segregated cycle tracks" is considered to be too specific but is likely to be proposed and supported within the policy approach itself. It is, however acknowledged that the Vision and Spatial Priority could be amended to give more emphasis to the potential for cycling

Officer Recommendation:

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

Response\_Number:

1372

Persons\_Name:

Mr P Walls

Representing\_Who?:

Himself

Respondents\_Comments:

Q3 The vision is local, specific, ambitious but I am not convinced it is realistic. The plan presumes a rate of growth which like all predictions for the future is based on evidence from past experience and past experience is not necessarily a good guide to the future. The assumptions on which the plan is based can inform the present and the robust implementation of aspirations does influence but not necessarily determine the future. If the supply of migrant labour is curtailed what evidence is there that a sufficient supply of indigenous labour with the commitment, reliability, willingness to accept the hard physical work in the less than congenial conditions in the horticultural, agricultural and food processing industry.

Officer\_Response:

Comments noted. It is acknowledged that circumstances change but there has to be a limit to what the Plan/vision can address.

Officer\_Recommendation:

Objection - No change to the approach is required.

<b>Response_Number:</b>	1373	<b>Persons_Name:</b>	Mr P Walls	<b>Representing_Who?:</b>	Himself
<b>Respondents_Comments:</b>	Q4 The Plan reflects a Vision but while Councils may propose it is the Developers who will deliver. There is an implicit commitment to growth but contains elements are not compatible with growth. The Plan seeks to ensure that land in non retail employment use should be prohibited from a change of use. This is an age of austerity. Small businesses need capital to fund expansion and create more jobs. This capital can be raised by realising the capital value of a employment site in a mixed commercial / residential zone and re-locate to a another local site with lower costs. Business activity and residential use do not always make good neighbours. A declining business facing closure may not find a buyer for the business or anyone prepared to buy the site for an alternative employment use. Potentially relocation is a win - win situation for the site owner, local workers, immediate neighbours and the Council and supports growth. The proposed Plan does not emphasise the significance of the role of Building Regulations regime in ensuring delivery so while the strategic priorities relate to the Vision there is no guarantee of delivery.	<b>Officer_Response:</b>	Comments noted. The comments represent several issues: that the Vision and Strategic Priorities will require developers to deliver; this is not contended. The Plan and policies will require the action of many stakeholders to deliver it. that there are elements of the Vision and Strategic Priorities that are not compatible with growth; this is not contended. There are inevitably constraints to growth and it is part of the planning process to raise awareness and provide a means to deal with them. that land in non retail employment use being protected from a change of use will inhibit development, possibly to the detriment of small businesses. Neither the Vision, Strategic Priorities or Policy protects employment uses without exception. New uses can be permitted provided the benefits of the new uses outweigh the disadvantages of loss of the employment land/premises.	<b>Officer_Recommendation:</b>	Objection - No change to the approach is required.

<b>Response_Number:</b>	1374	<b>Persons_Name:</b>	Mr P Walls	<b>Representing_Who?:</b>	Himself
<b>Respondents_Comments:</b>	Q5 issues are identified but the emphasis is much less realist or realisable. A defensible interpretation of the policy thrust is the slow strangulation of the Plan areas rural hinterland to facilitate urbanisation and exploit the potential financial benefit from Development Levies to fund infrastructure projects that directly benefit some urban residents.	<b>Officer_Response:</b>	Comments noted. It is a central plank of National policy and the draft plan to provide a framework for the delivery of sustainable development; economies of scale are created and supported for the provision of services and travel is reduced to allow increased levels of accessibility to services and to help counteract the detrimental man -made effects of climate change.	<b>Officer_Recommendation:</b>	Objection - No change to the approach is required.

Response\_Number:

1375

Persons\_Name:

Mr P Walls

Representing\_Who?:

Himself

Respondents\_Comments:

Q6 The process of implementing the new plan agreed with the national government is subject to a strict timetable and is too far progressed to advance anything more than cosmetic changes.

Officer\_Response:

Comments noted. It is not the case that the Plan cannot be changed. This is the first public consultation exercise the Plan has been through and it is a requirement that the Planning Authority ensures that the Plan that is submitted for examination is sound. If this requires further amendment and alteration then it is prudent that additional consultation is undertaken where such changes may be significant.

Officer\_Recommendation:

Objection - No change to the approach is required.

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