

SOUTH HOLLAND DISTRICT COUNCIL

Report of: South East Lincolnshire Joint Policy Unit Manager

To: South East Lincolnshire Joint Strategic Planning Committee (the Joint Committee)

(Author: Gary Alexander, South East Lincolnshire Joint Policy Unit Manager)

Subject: South East Lincolnshire Local Plan: Draft Local Plan

Purpose: To consider the initial findings of the public consultation exercise on the Draft Local Plan

Recommendations:

- 1) That Members consider the contents of this report and the attached Appendix A; and
- 2) That Members approve the recommendations set out in Section 2.0 (a-g) as follows:
 - That the overall housing needs identified in the recent Draft Local Plan remain the basis for evaluating preferred sites;
 - That the approach to development in the designated Countryside remains as defined in the recent Draft Local Plan;
 - That, whilst the categories in the settlement hierarchy remain the same, the approach to where settlements should be defined be reviewed;
 - That the housing need to be met within each settlement be reviewed; and, in the case of Holbeach, given its scale, role and function as a centre for services and employment, that a significant increase in its housing requirement be explored;
 - That the principle of an urban extension to the north of the Vernatt's Drain be retained, but that further consideration be given to the site-specific details relating to this proposal, in particular the number of dwellings involved, the nature of the countryside gap between Pinchbeck and Spalding in the vicinity of the railway and the Spalding Road, and the phased delivery of the development;
 - That the current position relating to the Spalding RFI is noted; however, if additional information in respect of its delivery is not forthcoming, the continued inclusion of this proposal be reconsidered at a future meeting; and
 - That work is undertaken on identifying a site(s) for non-food (comparison goods) retail development in Spalding to meet an identified need – for at least 10,810 sqm (net) floor space – in a sequentially preferable location(s): in the town centre, at the edge of the town centre or at sites well connected to the town centre.

1.0 BACKGROUND

- 1.1 At its meetings held on 11 September 2015 and 27 November 2015, the South East Lincolnshire Joint Strategic Planning Committee (the Joint Committee) gave consideration to reports relating to the approval of the contents of the 'Draft Local Plan' for the purpose of public consultation. Following approval by the Joint Committee, a public consultation exercise was held between **Friday, 8 January and Friday 19 February 2016 inclusive**.
- 1.2 A total of 433 individuals and organisations responded to the consultation, giving rise to 1666 separate comments. Appendix A to this report provides detailed information on the nature of the public consultation exercise undertaken and a summary of the responses received on each section of the Draft Local Plan. The summary of responses is arranged in the order set out in the Draft Local Plan.

2.0 KEY ISSUES

- 2.1 Following officers' consideration of Appendix A, a number of key issues have been identified on which a 'Member steer' is required at this point in time in order to guide further work. They are considered to be key issues because they are felt to be fundamental to the next stage of work on the Local Plan, that is evaluating new sites submitted as part of the recent consultation and then identifying the preferred sites. Part and parcel of this work will also be considering whether changes need to be made to the settlement hierarchy and also the levels of housing put forward for each settlement. Other site-related work on employment land, retail and open space will also be ongoing.
- 2.2 Members may wish to identify other key issues for discussion at the meeting having considered the contents of Appendix A.

Key Issues for consideration:

a) Objectively Assessed Housing Need

Twenty-two representations were received in relation to the proposed housing need for South East Lincolnshire. However, it is considered that no compelling evidence is provided by the objectors to substantiate reviewing the Strategic Housing Market Assessments to identify greater housing needs. The primary motive for seeking the identification of a greater housing need appears to be to allow a greater number of sites to be supported by the Local Plan. Presently, we have no evidence that an increase in the supply of housing land will bring about an increase in the delivery of housing over and above the current identified needs. The adopted Local Plan will, of course, be subject to review.

It is recommended that the overall housing needs identified in the recent Draft Local Plan remain the basis for evaluating preferred sites.

b) A more permissive/flexible approach to housing development in the designated Countryside, particularly adjacent to settlement boundaries

The Draft Local Plan does allow housing development in the Countryside through rural exception sites. This allows a flexible approach to meeting housing needs in addition to the preferred sites and other windfall opportunities within settlement boundaries. It should also be noted that comments were received that suggested that the Local Plan should take a more restrictive approach to development in the Countryside. However, it is considered that the Draft Local Plan takes an approach that is in general conformity with the National Planning Policy Framework.

It is recommended that the approach to development in the designated Countryside remains as defined in the recent Draft Local Plan.

c) Whether to change the status of settlements in the settlement hierarchy

Most of the comments relating to the demotion or promotion of settlements within the settlement hierarchy have been prompted by seeking lesser or greater levels of housing. Arguments against development have either been site specific, e.g. access or poor drainage, or have related to the general infrastructure of the settlement. Arguments for more development have, in general, been to promote specific sites or to promote a settlement as being capable of fulfilling a more sustainable role. At this stage we have to consider the comments in more detail and also to fully evaluate newly submitted sites and review the evidence in the round (e.g. flood risk, infrastructure, sustainability etc.).

It is recommended that, whilst the categories in the settlement hierarchy remain the same, the approach on where settlements should be defined be reviewed.

d) Distribution of New Housing

As indicated in c) above, this issue overlaps with consideration of the settlement hierarchy. We have new sites to consider (as well as selecting the preferred sites having regard to the many comments made on the suitability or otherwise of individual site options). A particular issue that has arisen, considering comments in the round, concerns whether Holbeach, given its scale, role and function, is suitable for accommodating a significantly higher level of housing than the 1,340 dwellings currently envisaged. This has arisen in the context of the separate promotion of the constituent parts of an existing South Holland Local Plan housing allocation (capable of accommodating over 800 dwellings) and another site with outline planning permission for some 900 dwellings (subject to the signing of a s106 agreement)

It is recommended that the housing need to be met within each settlement be reviewed; and, in the case of Holbeach, given its scale, role and function as a centre for services and employment, that a significant increase in its housing requirement be explored.

e) Sustainable Urban Extension for housing in Spalding

Whilst there has been general recognition for the need to provide more housing in Spalding, this proposal has generated some significant local concern in respect of the number of dwellings (4,000) involved and, in particular, that element of it which would serve to erode the 'countryside gap' between Pinchbeck and Spalding. Several comments have perceived the creation of a large 'cul-de-sac' development (based on the 'North Phase' of the Spalding Western Relief Road [SWRR]), which would serve to severely exacerbate traffic congestion on the Spalding Road. On this point, it should be noted that the Local Highway Authority has raised no objection to the proposal.

It has never been the intention to create a 4,000-dwelling development served by a single road. Such a quantum of development, if approved, would see completion stretch well beyond 2036 (the end of the period of the Local Plan), and such progress would be dependent on securing a second access point to the development linking it with the A151 Bourne Road by way of further phases of the SWRR.

It is recommended that the principle of an urban extension to the north of the Vernatt's Drain be retained, but that further consideration be given to the site-specific details relating to this proposal, in particular the number of dwellings involved, the nature of the countryside gap between Pinchbeck and Spalding in the vicinity of the railway and the Spalding Road, and the phased delivery of the development.

f) Spalding Rail-Freight Interchange (RFI)

There was a surprisingly limited response to this proposal with a mix of views expressing support for, and objection to, the scheme. Crucially, the developer interest in the proposed RFI did not utilise the public consultation exercise to provide any new information to support the deliverability of the facility - and neither has it done by other means to date. Officers require such information in order to justify a decision to continue to promote the proposed site through the Local Plan process and support its consideration at the Local Plan Examination. Accordingly, they have sought the receipt of the relevant information by 10 June of this year in order to inform a future decision on this matter by the Joint Committee.

It is recommended that the current position relating to the Spalding RFI be noted; however, if additional information in respect of its delivery is not forthcoming, the continued inclusion of this proposal be reconsidered at a future meeting.

g) Additional Retail Provision

In view of the comments received in relation to Policy 22: Additional Retail Provision, officers recognise there is a need for the Local Plan to be more proactive in ensuring that speculative out-of-centre development proposals - which would have a significant adverse impact upon the vitality and viability of Spalding and other town centres - can be resisted. Therefore, there is a need to allocate land for retail development to meet the predicted need for additional floor space identified in the current retail studies.

It is recommended that work is undertaken on identifying a site(s) for non-food (comparison goods) retail development in Spalding to meet an identified need – for at least 10,810 sqm (net) floor space – in a sequentially preferable location(s): in the town centre, at the edge of the town centre or at sites well connected to the town centre.

3.0 ADDITIONAL SITES PROMOTED THROUGH THE PUBLIC CONSULTATION

- 3.1 The public consultation exercise provided an additional opportunity for interested parties to promote sites for development hitherto not assessed through the Strategic Housing Land Availability Assessment (SHLAA) process. In total, 132 new sites were submitted for consideration.
- 3.2 The newly-submitted sites and comments on the site options and preferred options submitted during the public consultation exercise are presently being assessed. The process of preparing a final list of preferred options for development will be informed by the Member steer received following consideration of the Key Issues outlined in Section 2 of this report.

4.0 OPTIONS

- 4.1 Members can choose to accept the recommendations in Section 2.0.
- 4.2 Alternatively, Members can suggest changes to the recommendations which would enhance their utility.
- 4.3 Finally, by not approving the recommendations (the 'Do Nothing' option), Members would lend uncertainty to the plan-preparation process which could lead to delays in meeting the current Local Plan timetable.

5.0 REASONS FOR THE RECOMMENDATIONS

5.1 The reasons for the recommendations are to provide local planning authority approval on the future course of Local Plan preparation.

6.0 EXPECTED BENEFITS

6.1 By approving the recommendations, with or without changes, Members will serve to support the preparation of the Local Plan in accordance with the revised timetable.

7.0 IMPLICATIONS

7.1 Carbon Footprint / Environmental Issues

7.1.1 This report concerns the general location of future housing and other developments across South East Lincolnshire which will have implications for carbon footprint/environmental issues.

7.2 Corporate Priorities

7.2.1 The completed South East Lincolnshire Local Plan will help to deliver corporate priorities relating to the development and use of land and buildings.

7.3 Risk Management

7.3.1 Failure to achieve the timely adoption of the South East Lincolnshire Local Plan could prejudice the Joint Committee's ability to retain control over its preparation.

Background papers:- None

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This report refers to a Mandatory Service

Appendices attached to this report:

Appendix A South East Lincolnshire Draft Local Plan – Summary of
Consultation Responses

South East Lincolnshire Draft Local Plan Summary of Consultation Responses

1. The Consultation Process

The Draft Local Plan Consultation provided an opportunity to comment on the proposed draft policies and potential site allocations. The consultation ran from 8 January to 19 February 2016. A total of 433 individuals and organisations responded to the consultation amounting to 1666 separate comments

Notification and Availability of documents

Copies of the consultation documents, including the background papers and Sustainability Appraisal, were made available in all Boston and South Holland Council offices and libraries throughout the consultation period. Parish Councils received a copy of the complete Local Plan document.

All documents were also made available via the South East Lincolnshire Local Plan website.

Publicity

- All parish council clerks were individually provided advance notice of the public consultation exercise and posters publicising the exercise
- Press releases were issued by South Holland District Council on 31 December 2015 and 12 February 2016
- Boston Borough Council issued press releases on 8 January 2016 and 19 February 2016
- Adverts were placed in the Simply Boston and Simply Spalding magazines in January and February
- Leader's column in January edition of Simply Boston magazine
- Cabinet Call column with Cllr Gambba-Jones in Spalding Guardian (31 December 2015)
- Article in Spalding Voice
- Front page of Lincolnshire Free Press (5 January 2016)
- Article in Boston Standard (6 January 2016)
- BBC Radio Lincolnshire news item (8 January 2016)
- Continuous promotion of consultation during January and February via social media – South Holland District Council and South East Lincolnshire Local Plan Twitter accounts as well as Facebook
- Both Councils' websites, staff newsletters and Boston Bulletin Daily
- Notices in some Parish magazines
- Leaflets and posters were deposited/displayed in prominent locations, including libraries and doctors' surgeries

Local Plan events

In addition to permanent exhibitions at both Boston Borough Council and South Holland District Council offices during the consultation period, 'drop-in' events were held in sixteen settlements and all (except the Spalding South Holland Centre event) took place between 3.30pm and 7.30pm to enable people to attend after work. Displays were provided at each event with information being tailored to specific towns/villages and their rural hinterlands.

Below is the complete list of events with the number of attendees:

Date	Location	Attendees
Wednesday 13 January	Swineshead Village Hall	165
	Pinchbeck Village Hall	66
Friday 15 January	Wyberton Parish Hall	66
	Sutton Bridge Curlew Centre	42
Monday 18 January	Old Leake Community Centre	25
	Long Sutton Market House	80
Wednesday 20 January	Kirton Town Hall	101
Friday 22 January	Butterwick Village Hall	66
	Donington Ruby Hunt Centre	28
Monday 25 January	Sutterton Village Hall	78
Tuesday 26 January	Gedney Hill Memorial Hall	30
Thursday 28 January	Holbeach Community Centre	118
Tuesday 2 February	Surfleet Village Hall	87
Friday 5 February	Crowland British Legion Hall	30
Tuesday 9 February	Spalding South Holland Centre	80
Wednesday 10 February	Cowbit Village Hall	45

In addition, officers met with Pinchbeck Parish Council, Pedals (Spalding's Cycle Action Group), Spalding and District Civic Society and, following concerns raised by its Parish Clerk, Weston Parish Council; and gave a presentation to a public meeting on the Local Plan organised by the Long Sutton and District Civic Society which attracted 138 people.

Compliance with the Council's SCI

SCI Requirements	Met
Publishing Documents: <ul style="list-style-type: none"> ○ Council offices ○ Libraries ○ CD 	√
Council Website: <ul style="list-style-type: none"> ○ All documents on the Council's consultation portal ○ Available to download for free 	√
Local Media: <ul style="list-style-type: none"> ○ Public notices (statutory stages) ○ Press notices ○ Press releases 	√
Newsletters and Leaflets: <ul style="list-style-type: none"> ○ Leaflets ○ Newsletters (paper and electronic) 	√
Public Exhibitions, Displays and Road Shows: <ul style="list-style-type: none"> ○ Road Shows ○ Public exhibitions ○ Displays 	√

Interactive Workshops: <ul style="list-style-type: none"> ○ Workshops with key stakeholders ○ Workshops with communities 	√
Committee Meetings & Stakeholder Meetings: <ul style="list-style-type: none"> ○ Stakeholder group meetings 	√
Correspondence with Consultees: <ul style="list-style-type: none"> ○ Letters ○ Emails 	√

2. Summary of Responses – Policies and General Comments on the Draft Local Plan

The written responses received on the Draft Local Plan consultation are summarised below. The full set of comments for the consultation can be accessed at the following web address:

<http://southeastlincslocalplan.org/plan/>

2.1 Foreword, Introduction and Context

- Query that the Objectively Assessed Need (OAN) is incorrect (requires more factors to be considered)
- More flexible approach to settlement boundaries needed
- Ensure sufficient supply available in terms of enough sites/variety of sites to ensure delivery of housing/meet trajectory
- Raised concerns regarding technical standards in policy (NB – consider whether there is a need for a specific policy on technical standards)
- Suggestion that the affordable housing rates to be the same in Boston and South Holland (at least 15% on sites of ten or more dwellings)
- Support for design policy approach
- Concern that parts of the plan do not provide specific detail to counter vagueness of NPPF
- Suggest need for a “strong Green Infrastructure” policy to reduce impact on Wash and other potential European sites
- Various aspects of the Habitats Regulation Assessment report need improving/ considering further (functionally linked land; assess impact on Pink Footed Geese with respect to specific sites; consider in-combination effects further)
- Concern with respect to Sustainability Appraisal and assessment of heritage impacts with respect to site assessments
- Need to consider impact on water resources and whether improvements will be required to accommodate additional development
- Specific concern with respect to how the Boston Woods Trust projects are reflected in the Local Plan
- Confirmation that duty to cooperate has been fulfilled so far from the following local authorities/ joins local plan team (Peterborough, Kings Lynn and West Norfolk, Norfolk County Council, Central Lincolnshire Joint Planning Unit)
- Some concerns raised regarding duty to cooperate - requires more detail to evidence what has been done; case law noted requiring DTC to be evident throughout the process of developing the Local Plan; need to demonstrate cooperation on whether any unmet housing need evident in neighbouring authorities; need to ensure all relevant bodies involved in DTC

2.2 Spatial Portrait

- Support for commitment to sustainable development and sustainable transport
- It fails to point out that the South East Lincolnshire landscape lends itself to cycling both as a means of transport and leisure

- Uncertainty as to why contrast is made between Boston and Spalding in the use of cycles for journeys to work
- References to the importance of agriculture in South East Lincolnshire cited as reasons for considering site option Ged023 as unsuitable for development
- View that it would be helpful if the Local Plan were to set out how the 'housing need generated' by 14,000 seasonal workers is to be addressed
- There should be a reference to the age profile of the area, with its disproportionate numbers of elderly persons and the issue of the exodus to university of young adults who don't return because of the shortage of suitable employment opportunities
- Concern about the closure of village primary schools having implications for transport and sustainability

2.3 A Vision for South East Lincolnshire

- Suggestion that the reference to 'strategic highway improvements' should mean improvements for 'motorists, cyclists and pedestrians'
- There should be an additional paragraph referring to a significant modal shift away from the use of the motor car towards cycling and other forms of sustainable transport
- Support for the vision but would also like to see a specific reference to the importance of the fenland landscape and the internationally-protected wildlife habitats
- Support, particularly in respect of guiding development to sustainable locations
- There appears to be discounting of evidence that new development should not take place over much of the Local Plan area for reason of flood risk
- There appears to be no recognition of the willingness or ability of developers to deliver new housing or commercial space in areas of high or medium flood risk given the likely hardening of insurers' attitude to risk after 1st April 2016 when the 'Flood Re' flood risk insurance provisions come into force
- There should be a greater focus on the provision of new housing around 'transport hubs'
- The distribution of proposed employment and housing sites is not necessarily where the jobs or housing are or will be needed to generate 'truly self-sustaining communities'
- Support for the protection and enhancement of the natural environment
- Criticism of the emphasis on economics and flood risk; there should be a reference to 'enabling people to live healthier, fulfilled and creative lives'.

2.4 Strategic Priorities

- Concern about the lack of reference to a 'safeguarding corridor' for green infrastructure to the west of Boston which would build upon the work of the Boston Woods Trust
- The commitment to modal shift is as relevant to Strategic Priority 8 (SP8) as it is to SP12
- In SP12, replace the word 'increase' with the word 'maximise' before 'the potential for modal shift'
- Need to clarify the reference to 'rural areas' in SP12 as many regard the whole of South East Lincolnshire as being rural
- In SP12, the term 'highway infrastructure' should be defined as including 'infrastructure for the benefit of motorists, cyclists and pedestrians'
- SP12 needs to make clear that minimising congestion can be achieved, in part, by improving the infrastructure for cycling and walking
- Concern about the omission of rail infrastructure from transport priorities
- Support for strategic priorities, particularly those concerning the environment
- In SP11, it would be better to state: 'the need to travel will be minimised by siting future jobs, services and facilities as close as possible to population centres'
- Support, particularly in respect of guiding development to sustainable locations
- The environment section of the strategic priorities lacks ambition for the natural environment of South East Lincolnshire. In SP7, concern about the use of the wording, where appropriate, which is dismissive of the Authorities legal duties to conserve and enhance nature under the

Natural Environment and Rural Communities Act (2006); and the failure to meet the NPPF requirement to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure

- Support for SP1, SP3, SP7 and SP8, but request 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, especially given the concerns about climate change. In SP9, recommend that the word 'suitable' is inserted before 'previously-developed land'
- In SP10, add at end: '..., thereby enabling people to live healthy, fulfilled and creative lives'
- Suggestion that SP8 should refer to promoting 'resource efficiency' instead of 'energy efficiency' to ensure that water efficiency is included

2.5 Sustainable Communities

Key Issues and Context

- Broad support
- More emphasis on meeting the infrastructure and flood risk challenges specific to the plan area

2.5.1 Presumption in Favour of Sustainable Development

- Broad support
- Policy should make reference to brownfield land being preferred to greenfield for development
- Development cannot be sustainable when food growing land is to be lost
- Policy has too much emphasis on promoting development and growth; should include reference to delivering biodiversity gains
- Parts of Policy 1 are not considered to be in conformity with the NPPF and would be found to be unsound re: paragraph 182
- Amend to refer to; proactive working and pre-application discussions to make proposals acceptable

2.5.2 Spatial Strategy

Supporting Comments:

- Considerable support for the proposed spatial strategy
- Support that flood risk identified as a key issue for the Local Plan to consider
- Support for approach to recreation and tourism
- Support for Policy 2 approach to development which will assist in delivering the Viking Link scheme
- Policy 2 (Countryside) provides flexible framework for development
- Specific support for level of development and/or the suggested position in the settlement hierarchy proposed in the following settlements:
 - Boston (noting the need to account for flood risk issues in particular)
 - Spalding (specific sites identified; importance of Wardentree Lane Main Employment Area; note relationship between Spalding and Pinchbeck; and key delivery of SUE)
 - Pinchbeck (agreement that it is correct to identify as a Main Service Centre; should note that Pinchbeck and Spalding increasingly function together)
 - Holbeach (presence of services and facilities; and employment opportunities)
 - Sutterton (has services/facilities and appropriate location for growth)
 - Quadring (specific issues highlighted with respect to where development should be located)
 - Gosberton
 - Long Sutton (deliver development through small plots; sites promoted)
 - Deeping St Nicholas (note potential impact of Rail freight Interchange – need for more housing; sites promoted)
 - Cowbit (note potential impact of Rail freight Interchange)
 - Sutton St Edmund
 - Moulton (support designation as a Minor Service Centre)

- Moulton Chapel (support designation as a Minor Service Centre; suggest greater allocation of housing required)
- Gedney Church End
- Kirton (settlement boundary proposals supported)
- Tydd St Mary (site promoted)
- Saracen's Head (site promoted)
- Weston Hills (support designation as a Minor Service Centre; site promoted)
- Crowland (support designation as Main Service Centre; completion of A16 link will benefit the settlement)
- Old Leake (support allocation proposed)
- Surfleet (support designation as a Minor Service Centre)
- Fleet Hargate (support designation as a Minor Service Centre)

Objections

- Could have a greater emphasis towards housing development in the villages enabling sustainable development/ supporting and improving local facilities and services
- Critical of the settlements background paper (sustainability scoring) which leads to a restriction in potential development opportunities within the wider settlement hierarchy
- Concerns that flood risk has not been properly accounted for in allocating sites/ development – reference Lincolnshire Coastal Study and forthcoming national flood risk insurance schemes (need consideration in revising proposals)
- Concern that public transport provision is poor and eroding due to finance cut backs – increases isolation of communities
- Loss of agricultural land as a result of development proposed
- Policies 2 and 10 too permissive in approach to development in the countryside/ need for tighter wording on what will be considered acceptable in the countryside
- Policy 2 (Countryside) too permissive with respect to potential wind farm developments
- No policy approach to brownfield sites in the countryside
- Specific objections to the level of development proposed in the following settlements:
 - Sutterton (service and facilities assessment challenged; scale of development too large; await outcome of recent planning appeal; suggest it should be classified as a Minor Service Centre)
 - Long Sutton (services would not cope with extra development; poor job opportunities leading to more commuting; development proposed on farmland; flood risk)
 - Surfleet and Surfleet Seas End should form one settlement
 - Weston Hills St John and Weston Hills Austendyke should form one settlement and elevated to a Minor Service Centre (suggest additional sites to be included in the Local Plan)
 - Holbeach (impact of traffic and congestion from proposed levels of development)
 - Moulton Chapel (impact of development proposed)
 - Holbeach Hurn (settlement boundary prevents any development)
 - Tydd St Mary (limited facilities/services and poor public transport; impact on character of village)

General Comments

- If additional allocations are made, support for a greater spread across the village settlements, rather than the sub-regional centres
- Allow for development within or adjacent to the settlement boundary
- Consider Taylor Review – opportunity for cluster approach with smaller rural settlements
- Consider densities for proposed new development – can settlement character accommodate new development?
- Suggest settlement hierarchy should be amended to split category C settlements – include an approach that allows for development of up to five dwellings in/adjoining settlements (similar to Central Lincs approach in their emerging plan)

- Suggest that more development should be focussed on brownfield land
- Need to recognise different and distinct local housing market areas and reflect in Local Plan
- Suggest a general approach that development should be focussed in Spalding and Peterborough
- Note increasing tendency for rural planning authorities to abandon concept of settlement boundaries and develop other policies to enable protection of key areas/ prevent urban sprawl/ protect character of the countryside
- Policy 2 (Countryside) should include reference to various types of development that other policies in the plan would permit – rural exceptions, conversion of rural buildings to residential uses, and replacement dwellings

Specific points made with respect to following settlements:

- Combining settlements that are currently split:
 - Surfleet and Surfleet Seas End
 - Weston Hills St John and Weston Hills Austendyke ,
- Sutterton can accommodate more development
- Leverton should be a Minor Service Centre (presence of secondary school)
- Freiston – identified for employment so could have a greater level of housing
- Linkages between Spalding and Pinchbeck important and hence policy should reflect this
- Old Leake should be a Main Service Centre
- Query why Swineshead and Sutterton identified as a Main Service Centre – implied they will become a Main Service Centre rather than currently are already so
- West Pinchbeck needs consideration for development- infill opportunities?
- Holbeach sits above the other Main Service Centres
- Swineshead Bridge should be reclassified in settlement hierarchy (higher order settlement)

2.5.3 Development Management

- Broad support
- Policy should specify that larger scale proposals demand more evidence and that it may not be possible to satisfy all the criteria. Meeting the evidence requirements has significant costs
- Policy is not needed as its considerations are covered by the other policies of the Plan
- Having such a policy deters reference to the other policies of the Plan
- Sustainable materials and resources are not defined
- Justification should refer to all sources of flood risk and supporting flood risk assessments should be up to date and provided specific to each settlement
- Policy does not provide clarity with regard to what will be permitted (or not) and where and what mitigation will be required
- Refer to landscaping after “design”
- Make specific reference to maximising safe, convenient access by cycling
- Policy does not provide any spatial understanding of where sustainable locations are and in particular differentiate between such locations and the countryside
- Policy should make reference to socio-economic wellbeing and healthy environments
- Policy reiterates the NPPF and so is superfluous

2.5.4 Strategic Approach to Flood Risk

- Most up- to-date flood risk information should be used
- Development will not happen if not economic due to flood risk and/or insurance
- “Shall” is too absolute and provides no compromise to reflect the prevalence of flood risk in the plan area
- Policy 4 has no function once the land use allocations of the Local Plan have been made
- Policy 4 overlaps with Policy 3
- The Policy does not set out the process of considering the site selections the Local Plan has made

- The Policy provides insufficient detail on sequential testing and flood mitigation measures
- Reference to tree planting as an approach to flood mitigation should be made
- The policy does not refer to all the vulnerability definitions within the NPPF (excluding “less vulnerable”)
- There is no reference to infrastructure required to support renewable energy development
- Third sentence of paragraph 3.4.7 should refer to “flood mitigation”. The word mitigation has not been stated
- Reference to detailed information on Sustainable Drainage Systems should be made
- The Lincolnshire Coastal Study has been disregarded
- Has the influence of the Boston Barrier been assessed?
- A holistic catchment area approach to strategic flood risk should be taken which also provides soft engineering solutions for the benefit of wildlife

2.5.5 Meeting Physical Infrastructure and Service Needs

- Broad support
- Too much development and too little infrastructure capacity
- Reference to assessment management plans of the utility providers should be referred to in the Policy
- Existing traffic problems in Spalding should be addressed before the impact of more development is considered
- Green Infrastructure is a requirement as a separate Policy
- Specifications for amenity open space should be included especially in support of Habitat Regulations Assessment
- The Policy should include enabling developments or developments which might be exceptional to providing infrastructure because their benefits outweigh such considerations
- Localism means that Parish Council’s should decide where development takes place
- The policy is not needed and places all the emphasis on what developers will help provide without reference to what the service providers are obligated to provide
- Inclusion of infrastructure such as health provision is considered to be beyond what Local Plans should be asking for and therefore the approach is “unsound”
- Need for bypasses for Boston and Spalding

2.5.6 Developer Contributions

- Support for the overall approach taken to developer contributions
- Needs to be greater recognition that circumstances change over time (e.g. land values or costs) and how these can impact on the viability of a scheme
- Suggestion that Policy 6 should include a mechanism that allows developer contributions to be varied over time
- Support for a site specific viability assessment, although a standard format should be used such as those used by Fenland District Council, Borough Council of King’s Lynn & West Norfolk and/or the HCA, so that an independent assessment (at the developers’ expense) would not be required
- Concern that the use of open book viability assessments would not protect commercial confidentiality
- Clarification sought as to whether the use of commuted sums is acceptable under national guidance
- Consideration as to whether contributions for open-space maintenance should be required if funding can be secured through other means, e.g. council tax receipts
- Greater links needed to the Infrastructure Delivery Plan particularly the links to the prioritisation of developer contributions
- Greater recognition of the role other bodies (e.g. parish councils and internal drainage boards) play in the delivery of developer contributions

2.6 Promoting Employment Opportunities

2.6.1 Improving South East Lincolnshire's Employment Land Portfolio

- Overall support for the policy approach taken to protect and enhance the provision of employment land
- Not enough employment land is identified at Long Sutton to support the level of housing proposed
- Suggestion that the amount of land to be allocated at each location should be highlighted in the policy, and the respective areas identified on the Policies Map
- Specific points raised relating to Wingland Industrial Estate, Sutton Bridge:
 - some opposition to the employment allocation - the site should be reclassified as agricultural land
 - the proposed power station should be added to the Policies Map
 - support for ongoing employment development to help create jobs and making good use of infrastructure that has been provided
- Specific points raised relating to Riverside Industrial Estate, Boston:
 - support for the ongoing development of the employment area as a means of minimising traffic flows in Boston town centre
 - consideration as to whether the de-allocated land should be reinstated, particularly given the investment in infrastructure already made
- Support for Q2, Boston; Kirton Distribution Park; Wardentree Lane, Spalding; Clay Lake, Spalding; and the Food Enterprise Zone, Holbeach
- Greater recognition required of employment sites in the countryside - reference should be added to allow the modernisation and enhancement of previously-developed sites in the countryside, to allow their conversion, reuse and change of use to other sustainable uses
- Specific points raised relating to mixed-use development:
 - more flexibility needs to be included in order to recognise the role non-B use employment-generating development can play in supporting the local economy, particularly within Main Employment Areas, such as cafes, day nurseries etc.
 - mixed-used development should be extended to Local Employment Areas as well
 - suggestion that A1 use is not an appropriate use in Main Employment Areas
 - concern that the 20% threshold is too high - this would translate into a significant amount of floor space and would have an adverse impact upon the vitality and viability of the town centres
- Thirteen new employment sites were proposed in Spalding, Sutton Bridge and Long Sutton.

2.6.2 Specific Occupier and Restricted Use Sites

- Support for the Existing Specific Occupier Site at Weston, although suggestion that the allocation should cover a larger site
- Two Existing Occupier Sites (at Deeping St Nicholas and Horncastle Road, Boston) are no longer available for employment use
- Concern that the policy is too restrictive and does not allow for the extension or intensification of the existing use
- Clarification is sought in relation to point 1 of Policy 8

2.6.3 Spalding Rail Freight Interchange

- Greater consideration is required relating to several detailed issues arising from this proposal:
 - traffic generation and the impact upon the local road network
 - the impact upon international and national nature conservation sites
 - the impact on nearby heritage assets
 - the loss of agricultural land
 - the need to assess the impact on the water and water recycling network

2.6.4 Employment Development in the Countryside

- Suggestion that the policy approach should be extended beyond rural diversification and the reuse of farm buildings to include the needs of other businesses in the countryside, e.g. large-scale processing plants, storage units, rural tourism sites and holiday accommodation
- Consideration should be given to the provision of accommodation and other facilities for seasonal workers (e.g. laundrette, eating areas etc.) to help support the operation of rural businesses
- Concern that the 500 sqm threshold is too restrictive
- Greater consideration should be given to the impact of employment development in the countryside upon biodiversity
- Suggestion that the requirement for a business plan is not practical – most development will be leased and a business plan will not be available to accompany a planning application

2.7 Quality Housing for All

General Comments

- Query why the plan deviates from preferred 15 year timescale?
- Need to include allowance for self-build and custom build projects (both in policy approach and within development proposals/allocations).
- Consider the need for accessibility and space standards.

2.7.1 Meeting Objectively Assessed Housing Needs

- Need to increase housing requirement
 - meet Government aim to boost housing supply;
 - proposed level of development lower than previously considered (previous versions of SHMAs and Housing Land Supply Reports);
 - Current SHMAs do not make a suitable adjustment for market signals; meeting past under-delivery; meeting unmet need from neighbouring areas; utilise pessimistic jobs/economic forecasts; wrong approach to dealing with affordable housing; internal and international migration trends need to be revisited;
- Need greater flexibility in approach to allocations/settlement hierarchy
- Need to consider additional reasonable alternatives for the proposed level of housing development
- Need to update the evidence base background papers on spatial strategy and supplement with additional background material/evidence
- Express the housing figures as a minimum requirement
- Need a consistent evidence base from the two SHMAs
- Consider need to meet accommodation requirements for temporary seasonal workers and therefore a need to amend Policy 11 to reflect this.
- Need a more careful consideration of the relationship between economic forecasts/jobs and the level of housing development required
- Support for proposed level of development
 - Consistent with latest SHMA
 - Agreement that the two Councils should look at their five year land supply separately
- Question/Objections to the levels of development proposed
 - Query the evidence produced to demonstrate why development proposed is needed (in particular the Sustainable Settlements study and scoring in the study)
- Site specific comments submitted

2.7.2 Distribution of New Housing

- Support for following settlements in terms of their position in the settlement hierarchy/ proposed levels of development:
 - Sutton St James (need to consider Anglian Water's requirements regarding additional sewer works)

- Quading; Deeping St Nicholas; Gosberton; Spalding; Gedney Church End; Fleet Hargate; Pinchbeck; Cowbit; Bicker; Donington; Weston; Crowland; Moulton Chapel; Moulton; Whaplode; Swineshead; Surfleet (although need flexibility for more potential growth; suggestions made on specific development options)
 - Sutterton
 - Holbeach
- Objections to the following settlements that suggest the need for more development in terms of their position in the settlement hierarchy/ proposed levels of development:
 - Suggest settlement boundaries need revising in Lutton; Weston Hills St John; Tongue End; Northgate & West Pinchbeck; Whaplode Drove; Surfleet Seas End; Saracens Head; Gedney Drove End; Moulton Seas End; Fosdyke; Gedney Dyke; Holbeach St Johns (sites excluded currently)
 - Suggestions that the following settlements need to be elevated in the settlement hierarchy: Lutton; Weston Hills St John; Tongue End; Northgate & West Pinchbeck; Surfleet Seas End; Saracens Head; Gedney Drove End; Moulton Seas End; Fosdyke; Gedney Dyke; Holbeach St Johns
 - Long Sutton (increase to 750 dwellings based on sustainability score and settlement hierarchy position; development on smaller sites preferred)
 - Freiston/Haltoft End (needs a greater level of development)
 - Old Leake (employment and service available suggest a higher level of development can be achieved)
 - Crowland (higher levels of development proposed)
 - Holbeach (increase to 1800 dwellings; need to increase rate of delivery compared to recent past rates; important location for employment opportunities;)
 - Swineshead (33% increase/ 200 units more appropriate)
 - Swineshead Bridge (elevate to Minor Service Centre; needs more development to survive)
 - Sutton Bridge (increase proposed level of development; four minor service centres have higher levels of development)
 - Kirton (need for further site allocations)
 - Weston Hills Austendyke; Sutton St Edmund – no allocations at present but flexibility in approach to development requirements may lead to higher levels of growth and hence development in additional settlements
- Objections to the following settlements that suggest the need for lower levels of development:
 - Sutton Bridge (impact on medical centre)
 - Holbeach (traffic impacts)
 - Crowland (traffic impacts)
 - Pinchbeck's identification as a Main Service Centre and resultant impact on the settlement (infrastructure will not cope; unsustainable level of development)
 - Moulton (development levels proposed too high)
 - Moulton Chapel (village will double in size; impact on local school and services)
 - Long Sutton (cannot deliver proposed level of development; figure too high; flood risk)
 - Weston (figure too high; impact on infrastructure)
 - Boston (reliance on urban extensions; impact on services and infrastructure)
 - Sutterton (development levels proposed too high; impact of character; impact on services;
 - Tydd St Mary (level of development proposed too high; poor public transport links)
- Specific comments made in support of sites in the following settlements
 - Donington (Don 008; Don033)
 - Kirton/Frampton (KIR037)
 - Crowland (Cro031)
 - Wigtoft (Wig009; Wig012 and Wig 013)

- Holbeach (HOB048)
 - Gosberton (GOS11)
 - Sutton Bridge (Sub013 and Sub016)
 - Holbeach (Hob051 and Hob052)
- Specific objections made to sites in the following settlements
 - Kirton/Frampton (FRA024)
 - Holbeach (Hob043)
 - Boston (Fis001)
 - Pinchbeck (Pin02)
- Additional sites suggested in the following settlements
 - Wyberton (no site refs)
 - Pinchbeck (PIN025)
 - Gedney Dyke (no site ref)
 - Holbeach St John (no site ref)
- Other comments:
 - Too much reliance on urban extensions proposals in Boston – should spread development out into other settlements
 - Arbitrary pro-rata lowering of South Holland housing figures based on change in OAN between SHMAs is not supported
 - Concern that the strategy ignores previous work of the Lincolnshire Coastal Strategy
 - Surfleet and Surfleet Seas End should be one settlement
 - Spalding
 - Concern with respect to the proposals for allocations to the north/west of the town.
 - Suggest alternatives to the south east (provides more choice; can contribute to congestion relief in the town; proximity to existing schools and services including the town centre; can overcome potential flood risk issues)
 - Merge the housing figure for Spalding and Pinchbeck
 - Development delivery rates challenged (30 per year rather than 50 per year)
 - Need to identify the specific sites preferred for housing development (at odds with the employment sites that have been identified already)
 - Need to follow recommendations of the Taylor Review – allow for more development in rural areas
 - Starter Homes proposals need to be accounted for
 - Ensuring development proposals for housing match the requirements for jobs

2.7.3 A Sustainable Urban Extension for housing in Spalding

- Before any building of houses on Area A (Preferred Housing Site Pin045) is undertaken there must be provision for an exit onto Market Way so that the businesses in Pinchbeck Village Centre are not penalised because of limited access. The relief road through Preferred Housing Site Pin024 should be completed to Bourne Road A151 before residential building so that there is an access at both ends. This should avoid more congestion at proposed R1 roundabout (Spalding Road, Pinchbeck) which already has excess traffic into Spalding Town. Support for commitment to sustainable development and sustainable transport
- Concern relating to which area the proposed 'North Phase' of the Spalding Western Relief Road (SWRR) will actually lead - and when - and whether it will give rise to any detrimental impact on Pinchbeck
- Concern about whether sufficient physical and community infrastructure will be provided to support the additional population
- Request for a mix of house types, including good-quality affordable housing

- Concern about the creation of a 4,000-dwelling cul-de-sac development which would exacerbate traffic congestion on the Spalding Road and neighbouring areas
- View that the SWRR should run across the Vernatt's Drain, around the west of Pinchbeck and link with the A16 at Surfleet, via the A152
- Request for the retention of a 'substantial green corridor' between Pinchbeck and Spalding in order to protect the character of the former
- Concern about the reliance on the proposed urban extension for realising a significant proportion of the target housing growth in South Holland District, and, in turn, the reliance on the delivery of the SWRR for securing the urban extension
- The route of the SWRR needs to be shown in full
- View that the proposed housing growth should be accommodated on the southern side of Spalding
- Concern about most of the existing and proposed housing development being in the control 'of so few', which could lead to a situation of no meaningful housing development despite significant allocations of land
- Suggestion that completion of the 'southern phase' of the SWRR (from Spalding Common to Horseshoe Road) would significantly ease traffic congestion in the town, but the full benefits of the SWRR require completion of the route to Spalding Road
- No further land to the north or west of Spalding should be considered for development prior to the completion of sections of the SWRR running north from Spalding Common to Horseshoe Road and Wygate Park to Spalding Road. Given this view and other reasons, promotion of sites for housing development in the Clay Lake area (to the south-east of Spalding)
- Request for Policy 13 to include provisions to facilitate walking and cycling both within the development and to neighbouring local facilities, and to incorporate an existing cycle route linking Pinchbeck with Spalding
- Note that the current update of the South Holland District Strategic Flood Risk Assessment (SFRA) will include the area of the proposed urban extension, and its findings will need to be considered in respect of the viability of the proposal
- Considers that Policy 13 should include Holbeach's large Potential Housing Site Hob048 because of its similar circumstances and requirements
- Considers that Policy 13 contains insufficient guidance/requirements relating to Phases 2 and 3; and suggests that Phase 1 be expanded to include Potential Housing Sites Pin053 and Pin057
- View that the delivery of the SWRR cannot be guaranteed if it is to be funded by developers and, therefore, the focus should be on linking the A151 to the A1175
- Concern that the proposal will prove detrimental to the biodiversity and leisure value of the area to the north of the Vernatt's Drain
- Criticism of showing site options for development on the Policies Map Insets
- View that Pinchbeck Parish Council has determined that no building should take place between Market Way, Pinchbeck and the Vernatt's Drain
- Objection to having to accommodate housing growth in South Holland District
- Promotion of green infrastructure corridors throughout the proposed site which could link to the Vernatt's Drain
- View that the required housing growth should take place on the A151 Bourne Road corridor
- View that the required housing growth should take place either to the west or south of Spalding
- Questioning of the deliverability of the SWRR
- Support for proposals, but Policy 13 should make clear at the outset that 'each of the phases A, B and C should ensure the provision of the relief road with no land ownership impediments in the form of potential for ransom payments that might hamper the overall completion in its entirety'

- View that Potential Housing Sites located in the south and south-east of Spalding are more appropriate for development than the proposed urban extension
- Request for the amount of open space required for the proposed urban extension to be specified
- Concern raised regarding the extent of development and the impact on both Spalding and Pinchbeck
- Demand that the SWRR should represent the northern boundary of Spalding 'with a clear gap to Pinchbeck, and no development in this area should be allowed until realistic plans for the SWRR to at least Bourne Road are in place'
- The SWRR will not fulfil its function until it is completed in its entirety
- Support for the provision of a large area of open green space to maintain the separation between Pinchbeck and Spalding. As this land and the route of the SWRR are in close proximity to the Vernatt's Drain Local Wildlife Site (LWS), there is an expectation that these developments would seek to enhance the biodiversity of the area through the provision of new habitats which complement the habitats present in the LWS and work to buffer and extend the existing network of green infrastructure
- Criticism of the distance of that part of the proposed urban extension lying to the west of the railway line in terms of accessibility to services and facilities
- It is important to ensure that the long-term management costs of the proposed green infrastructure are taken into account in future work on the proposed urban extension
- Concern about 'a major SUE to be outside the line of the road serving it'
- Suggestion that 'it would perhaps be sensible to have a Boston and a generic SUE policy going forward' in addition to the policy for Spalding
- Request for local Public Health officers to be part of discussions 'at pre application advice and broad concept plan stages'
- Concern about the detrimental impact on the residential amenity of Broadway, Spalding arising from the proposal for a SWRR
- Suggestion for policy to be amended to require the provision of a 'foul drainage strategy for the whole site and each phase of the development'
- Support for the development of Preferred Housing Site Pin045 but request that Potential Housing Site Pin016 and that part of Pin045 lying to the west of the railway line proposed as green infrastructure also be designated as part of Area A
- Suggestion for a more flexible approach to development in Area A, which would include retail uses, in order to raise sufficient funding for the SWRR element of Area A
- View that there may be a more cost-effective way of designing the SWRR element

2.7.4 Providing a Mix of Housing

- More flexible approach required to allow for site by site considerations

2.7.5 Affordable Housing

- Objection to the differential affordable housing rates between Boston and South Holland
- Consider how to deliver sufficient affordable housing (impact on OAN and housing requirement)
- Need to account for emerging Government requirements on starter homes
- Need for greater flexibility in the policy approach to enable affordable housing to be delivered

2.7.6 Rural Housing Exceptions Sites

- Object to any spatial reference in relation to the provision of rural exceptions sites (linked to objection that settlement boundaries should be removed from the plan)
- Remove reference for need for local support to rural exceptions proposals
- Support for enabling development to facilitate the delivery of sites

2.7.7 Gypsies and Travellers and Travelling Showpeople

- General support for the policy and its approach
- Some suggested amendments provided to clarify the policy
- Concern expressed with respect to the details on the proposed allocation and the intention to identify sites as a result of future planning proposals

2.7.8 HMOs and Sub-Division of Dwellings

- Support for inclusion of criteria protecting the historic and natural environment
- Avoidance of a significant adverse effect on the immediate environment (e.g. street parking, highway safety etc...) should be fundamental to policy
- Suggestion that policy should include reference to maintaining street frontage and requirement for resident manager in HMO
- Clarify what “acceptable loss” of family dwellings means
- Support for the reference to good cycling access
- Concern raised over reliance upon Nationally Described Space Standards- the NPPG only covers dwellings designed for up to 8 people residing in dwellings containing up to 6 bedrooms – which provides no scalable size assessment

2.7.9 Replacement Dwellings

- General support for inclusion of policy
- Suggestion that policy should include reference to protected species and requirement for ecological survey where protected species are present
- Reference to the imposition of a planning condition or securing of a legal agreement to restrict occupation to a rural worker should be removed
- Reference to the removal of permitted development rights should be made more specific so that it relates only to extensions to the dwelling and not to outbuildings
- Need to justify why high standard of design is required – design should be appropriate to site and its locality
- Support for policy’s reference to relocating replacement dwelling within existing curtilage to reduce flood risk
- Suggestion that it would be useful to include reference to other ways of reducing flood risk (e.g. raising finished floor levels)

2.7.10 Conversion of Redundant Rural Buildings to Residential Use

- General support for inclusion of policy and its role in helping meet housing need
- Requirement for ecological surveys generally welcomed
- Inclusion of a reference to Habitat Regulations 2010 recommended
- Suggestion that policy should be made broader – policy should not be limited to buildings which are of architectural or historic merit, or make a positive contribution to the character of the landscape – to avoid missing opportunities for sustainable forms of development
- Reference to the imposition of a planning condition or securing of a legal agreement to restrict occupation to a rural worker should be removed

2.7.11 Agricultural, Forestry and Other Rural Workers Dwellings

- Suggestion that reference to “other existing accommodation in the area” should be removed or be altered to “immediate locality”
- Suggestion that reference to potential impacts on biodiversity should be included in policy

2.8 Vibrant Town Centres and Accessible Shops and Services

2.8.1 Retail Hierarchy

- Support for the retail hierarchy and the approach taken to protect and enhance the retail offer in the town centres, particularly Boston and Spalding
- The Spalding Primary Shopping Area boundary should be expanded to include Holland Market and Winfrey Avenue to enable additional comparison goods floors pace to be accommodated over the plan period
- Specific points relating to the Retail Impact Assessment threshold:
 - the threshold is too low when compared to national policy
 - the proposed threshold will protect the vitality and viability of the town centres, particularly Spalding
- Greater recognition needs to be given to the important role Springfield Retail Outlet has as a retail and tourism facility
- Concern that Springfield Retail Outlet is outside the settlement boundary of Spalding – given that the adjoining land uses are within the boundary, the site would form a natural extension to the built form of the town
- Clarification sought relating to the provisions for farm shops and the selling of goods produced in the locality

2.8.2 Primary Shopping Frontages

- Primary shopping frontages should remain wholly in retail (A1) use

2.8.3 Additional Retail Provision

- Support for the level of provision identified for convenience goods floors pace and the approach to its delivery
- Suggestion that a retail allocation would be required to accommodate the level of comparison goods floor space identified for Spalding – there are no available sites within or on the edge of Spalding Town Centre, and without an allocation a policy vacuum exists, which is contrary to national policy
- One additional out of centre site was proposed to accommodate comparison goods floor space

2.9 Distinctive Greener, Cleaner, Healthier Environment

Policy Context

- Encourage cycling and walking as a key issue
- Improve wording for para 7.0.1 to reflect NPPF better (net gains in biodiversity)
- Uneven spread of green space provision in South Holland (Spalding has a “dire shortfall” whereas others “very generously provided” such as Crowland and Holbeach)

2.9.1 Natural Environment

- Boston woods area of search not shown on the maps.
- Specific concerns identified in settlements/sites:
 - Moulton Park
 - Fra024, Fis001, Fen 001 (loss of wildlife site)
 - Witham Park Countryside Park (part of site suggested for residential development)
- Support for the approach that protects and augment habitat - include wording on retention and management of existing hedgerows; opportunities for public recreation; conservation based tourism
- General wording amendments including consideration of implications of additional guidance documents - add in reference to Nature Improvement Areas and consider importance of locally designated sites (LWS, LGS)
- Amend wording for policy 25 to better reflect Habitats Regulations and NPPF
- Green Infrastructure needs some further consideration in terms of strategic policy approach

2.9.2 Historic Environment

- Spalding needs to be preserved
- Need to designate a conservation area in Sutton Bridge
- Wording changes suggested to the policy
- Need to consider the wider planning benefits from development that may outweigh harm to heritage assets or mitigate such harm;
- Heritage assets of local interest should not be considered on the same basis as statutory heritage listings

2.9.3 Pollution

- Need to ensure a strategic approach to air quality is captured in policy whilst recognising the specific current air quality management areas in Boston – reference to existing additional guidance on air quality would be helpful
- Impact of noise and nuisance pollution from additional development proposed (specific ref to sites in Long Sutton)
- Strengthen Air Quality and light pollution provisions and provide threshold limits
- Include additional aspects of pollution in the policy
 - protection of soils in the policy and refer to loss of best and most versatile land
 - role of trees in reducing pollution
 - impact of light pollution
- Need for a balanced approach in looking at impacts of pollution as a result of development proposals

2.9.4 Climate Change and Renewable /Low Carbon Energy

- The renewable energy policy will need to be amended following national policy and regulation changes.
- Policy approach by Rotherham Council suggested as a good model to follow
- Support approach taken including reference to National Character Areas and Local Landscape Character Assessments
- Support for points on green infrastructure, biodiversity, application of SUDs
- No reference to heritage assets in the policy
- Approach too prescriptive in seeking locally sourced and recycled materials/ requiring developers to reduce emissions
- Question need for specific policy – can be dealt with by reference to Policy 3 on Development Management and in housing allocations
- Contribution of trees and woodlands to climate change adaptation
- Impact of renewable energy schemes including loss of farmland and erosion of attractiveness of the countryside
- Clarify approach to sequential end exceptions test with respect to flood risk – should only apply to flood zones 2 and 3
- Careful consideration of the application of SUDs
- Use of Building Regulations to apply standards for construction and energy efficiency measures
- Additional wording to include infrastructure requirements that support the development of renewable energy schemes
- Identify additional wording to support community led schemes

2.9.5 Design of New Development

- Support for policy providing appropriate level of detail
- Additional wording to include need for bicycle storage
- Include more detailed expectations of design requirements including water consumption targets
- Inclusion of appropriate drainage solutions (specific comment to sites in Long Sutton and general comment on negative impact to Long Sutton from development proposals)

- Landscape character needs greater emphasis in the plan (separate policy?)
- Biodiversity incorporated into design (Exeter City Council residential design guide SPD cited as a good example)
- Welcome reference to historic environment
- Question need for 16 criteria listed – policy will still achieve objective without listing criteria
- Repetition in the criteria from other policies and need for clarification of certain criteria
- Include need for viability to ensure policy is flexible and development is deliverable
- Need for a separate Lifetime Homes policy and to consider needs of various groups in society (dementia friendly design, encouraging physical activity)
- Consider the use of Ministerial Statement with respect to water efficiency standards

2.9.6 Promoting Safe Accessible Open Space, Sport and Recreational Facilities

- Specific identification of the need for green space in Spalding; protection of existing green space (Moulton Park); recognise the opportunity to promote use of the Coronation channel;
- Consider need for open space and play facilities within new development proposals
- Suggest new sports hall provision rather than housing on site Don033
- Cycle parking needs to be included in the policy
- Clarify the approach to open space and community facilities needs with reference to suggested standards in the existing evidence base (Sports Provisions and Open Space Assessment)
- Add in references to contribution of open space to nature conservation/ recommend the use of Accessible Natural Green space Standard (ANGSt)
- Include reference to community facilities in policy title
- Object to sites Fis001 and Fis017 and impact in reducing public access to rural open space
- Aspects of the policy better dealt with elsewhere (e.g. Policies 3 and 6)
- Include reference to the contribution of trees and woodland to open space
- Inclusion of a healthy planning checklist

2.10 Efficient and Effective Transport

2.10.1 Delivering a More Sustainable Transport Network

- Specific points relating to the Boston Distributor Road:
 - Boston's highways network is inadequate for present and future needs - all development should be located to the south of Boston to aid the construction of the Distributor Road
 - concern that the policy does not provide a detailed solution or commitment to delivery
 - the cost of a Distributor Road (including bridges and crossings) will make the scheme unviable
- Specific points relating to the Spalding Western Relief Road:
 - support for the road from those promoting land in that broad location
 - clarification sought in relation to delivery and implementation
 - concern that the 'cul-de-sac' scheme will lead to a significant increase in traffic on Spalding Road and Enterprise Way which will add to congestion and adversely impact upon residents quality of life
- Support for Peppermint Junction, Holbeach
- Greater consideration should be made of the use of rail and to the reopening of Littleworth Station

2.10.2 Vehicle and Cycle Parking

- Specific points relating to parking standards:
 - concern that the car parking standards (for residents and visitors) are too prescriptive – the overall requirement and the size of the garages will be unviable in terms of cost and the amount of land required to meet them
 - need a lower threshold in combination with design standards
 - minimal parking should be avoided to prevent cluttered streets

- Clarification is required in relation to the cycle parking requirement for flatted development
- Roads need to be of a sufficient width for emergency vehicles to pass with parked vehicles on either side
- Clarification is sought as to whether visitor parking spaces will form part of the adoptable highway network

2.11 Monitoring, Glossary and Appendices (Saved Policies and Car Parking Standards)

- Support inclusion on monitoring indicators; suggest additional need for health indicators
- Some changes and additions suggested for the glossary
- Need for an additional specific policy covering provision of care homes and nursing homes (refer to saved policy H9 in Boston Local Plan)
- Suggested changes to parking standards including the need to refer to cycle parking in the title and add detail on cycle parking standards

2.12 Policies Map – General Points

- Amendments to the policies map to reflect cycle routes
- Ensuring the application of sequential test in site selection with reference to the supporting Housing Papers covering the various settlements
- Object to the inclusion of settlement boundaries
- Object to the omission of sites with 10 or fewer dwellings
- Moulton Marsh should only be identified as a Local Wildlife Site (remove the recreational open space designation)

3. Summary of Responses – Settlements and Sites

General Comments

- Concerns that settlement character would be harmed and views of open countryside lost.
- Concerns about loss of privacy, loss of light and overlooking from new developments.
- Suggest that more development should be focussed on brownfield land.
- Objections to loss of agricultural land as a result of development proposed.
- There needs to be enough local employment opportunities to support new developments.
- Concern that there are not adequate local services to support additional housing, such as local schools and doctor's surgeries being at full capacity.
- Concern that public transport provision is poor and eroding due to finance cut backs.
- Concerns that sewerage infrastructure is not adequate enough to support additional housing.
- Objections to the increase in traffic that housing development may bring and concerns about highway safety.
- Objections to housing development on land that may lead to increase in flood risk.
- Developers should contribute to the infrastructure required to support the increased population from the new developments.
- Support for new housing helping to sustain local services and rural communities.
- General support for the need for more housing in Lincolnshire and the country.
- Support for sites which do not encroach onto the open countryside and are accessible to local services.
- Apply the sequential test when considering the flood risk of sites.
- Protect local heritage.

Specific Comments by Settlement

Boston

- Objections to site Fis001 because of lack of local services, inadequate infrastructure and concerns about highways. Site needs to be tested for contamination.
- Concerns about impact of proposed developments on traffic congestion and highway safety.

Spalding and Pinchbeck

- Maintain the green space separation between Spalding and Pinchbeck.
- Objections to the development north of Vernatts for over 4000 houses. The development will cause traffic congestion.
- Preference for housing to be south-east of Spalding instead.
- Support for a relief road for Spalding.

Crowland

- Support for several sites and support for Crowland being a sustainable location for development.

Donington

- Support for proposed sites. Good provision of local services and amenities.

Holbeach

- Support for several proposed sites.
- Concerns about increase in traffic from new developments.

Kirton

- Objections to site Fra024. Concerns about increased traffic on Middlegate Road and impact on sewerage.
- General support for site Kir037. Sustainable location.

Long Sutton

- Services would not cope with extra development; poor job opportunities leading to more commuting; development proposed on farmland; flood risk.

Sutterton

- Objections to several sites and concerns about lack of local services supporting new developments.
- Objections to Sut006. Site has been previously discounted.

Sutton Bridge

- Support for housing sites.
- Opposition to Wingland industrial land in employment use.

Swineshead

- Objections are mainly to sites Swi036 and Swi039. Concerns about flooding and highways.

Bicker

- Concerns about impact on Conservation Area and listed buildings.

Butterwick

- General support for housing sites.

Cowbit

- General support for housing sites.

Deeping St Nicholas

- Mixed support for housing sites.

Fishtoft

- Concerns about flood risk.

Fleet Hargate

- General support for sites.

Gedney Church End

- General objection to sites. Concerns about increased traffic, lack of local services, harm to local amenity, flood risk.

Gedney Hill

- General support for sites.

Gosberton

- General support for sites.

Moulton

- Concerns about lack of local services, inadequate infrastructure, harm to local character, flood risk.

Moulton Chapel

- Concerns about lack of local services, inadequate infrastructure, harm to local character, flood risk.

Old Leake

- Concerns about sewerage, flood risk and harm to local character.

Quadring

- General support for housing development in Quadring and, in particular, support for development to the south east and behind 47 Main Road and 11a Sarah Gate.

Surfleet

- Support for the proposed settlement plan.
- Surfleet and Surfleet Seas End should form one settlement.

Tydd St Mary

- Scale of proposed development proposed is too high.
- Concerns about lack of local services, inadequate infrastructure, harm to local character, flood risk.

Weston

- Mixed support for sites.
- Concerns about impact on local infrastructure from new developments.

Whaplode

- General support for sites.

Frampton

- Objections to sites Fra005 and Fra024 because of concerns with highways and lack of local services/infrastructure.

Surfleet Seas End

- Support for the settlement boundary and Surfleet Seas End should be grouped together with the main settlement of Surfleet.