

Appendix 1



South East Lincolnshire
Joint Strategic Planning Committee

South East Lincolnshire Local Plan

Public consultation on the Preferred Sites for
Development

(15 July-12 August 2016)

Summary of Consultation Response

1. Summary of Responses

The written responses received on the public consultation on the **Preferred Sites for Development** are summarised below. The summary firstly provides an overview of the comments received on the proposed changes to Policies 2 and 12 of the Local Plan. It then highlights any comments made with respect to each settlement that cover broad issues about the proposed allocations, including any comments that refer to retail and employment land matters/allocations. Separate analysis of the specific comments about individual housing sites are covered in the updated Housing Papers for each settlement.

The full set of comments for the consultation can be accessed at the following web address:

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

2. Policy 2: Spatial Strategy

- Support designation of Boston as a **Sub-Regional Centre**
- Support for the change proposed to treat Surfleet and Surfleet Seas End as one settlement.
- Support for retaining the following settlements as **Main Service Centres**:
 - Sutton Bridge
 - Donington
 - Pinchbeck (proximity to Spalding point)
 - Crowland (3)
- Support for retaining the following settlements as **Minor Service Centres**:
 - Surfleet
 - Moulton Chapel
 - Weston Hills
- Support for retaining the following settlements as **Other Service Centres and Settlements**:
 - Holbeach Drove
 - Wrangle
- Need to update objectively-assessed need for housing (OAN) to reflect 2014 household projections (published July 2016).
- Settlement boundaries should not be used to restrict development.

- Suggested alternative wording for policy approach to development in the Countryside.
- Need to take account of updated flood risk information.
- Object to Sutterton being identified as a Main Service Centre (suggest it should be a Minor Service Centre).
- Haltoft End should be a Minor Service Centre.
- Question why Freiston is not included in the settlements proposed for allocations.

3. Policy 12: Distribution of New Housing

- Support for the proposed levels of housing in the following settlements:
 - Spalding (7 respondents)
 - Crowland (3 respondents)
 - Gosberton (3 respondents)
 - Pinchbeck (3 respondents)
 - Gedney Hill (2 respondents)
 - Quadring (2 respondents)
 - Surfleet (2 respondents)
 - Weston (2 respondents)
 - Cowbit
 - Kirton
 - Fleet Hargate
 - Moulton Chapel
 - Sutton Bridge
 - Wrangle
- Objections for the proposed levels of housing in the following settlements:
 - Quadring (figure too high) (2 respondents)
 - Whaplode (2 respondents - should be increased)
 - Bicker (allocations shortfall needs to be addressed – site suggested (BIC004))
 - Long Sutton (suggest need for an additional allocated site)
 - Moulton Chapel (figure too high)

- Moulton (object to reduction in proposed figure)
 - Swineshead (suggest at least an additional 100 dwellings)
- Difference between housing need identified in the Strategic Housing Market Assessment (SHMA) and housing allocations for Boston town, with the possibility to allocate a greater amount of housing in the town (2 respondents).
 - Need to consider greater flexibility in allocations to account for potential lapse rate/non-implementation of permissions. Suggested that there should be smaller sites made available to improve choice and flexibility and increase the likely rate of delivery. (3 respondents).
 - Include each allocation within policy 12 or cross reference to listing of allocations in an appendix.
 - Methodological approach undertaken in the two respective SHMAs is challenged and in particular the response to market signals; and how affordable housing has been accounted for. Need to update OAN to reflect 2014 household projections (published July 2016).
 - Refer back to previous HBF comments on the Draft Local Plan consultation undertaken in Jan/Feb 2016. Highlight concerns with respect to the approach to OAN (compatible in both SHMAs?); method applied to calculate affordable housing need; and whether there is alignment between the economic policies in the Local Plan and the level of housing proposed to be delivered.
 - Offer from a company delivering an "...innovative affordable housing model aimed at delivering discounted rented homes to buy for people who are unable to acquire a property on the open market but also trapped by ineligibility for existing affordable housing tenures."
 - Need to take account of updated flood risk information.
 - Need to show where proposed allocations are anticipated to deliver housing development beyond the Local Plan period (after 2036).
 - Possible need for additional resources to be provided by the Lincolnshire Fire and Rescue service to respond to the proposals for allocations in areas of higher flood risk.

4. Comments by Settlement

The bulk of the comments refer to specific housing sites with the details of these representations summarised and considered in the updated Housing Papers. A

number of general comments have been raised by respondents which are noted below for each settlement.

Boston

- Housing
 - There has been a persistent undersupply of housing in Boston.
 - Possible need for the settlement boundary to be redrawn subject to appeal case with respect to Site Nor013.
 - Question the logic of offering 4,681 dwellings plus 51 additional small sites, when it is stated in the Local Plan that 3,794 dwellings were needed. This means more houses are planned than is required which given uncertain economic times requires careful management of future resources.
- Water Resources
 - All the proposed site allocations lie within areas classified as either 'Danger for All' (flood depths 1.0-2.0m) or 'Danger for Most' (flood depths 0.5-1 m) on the Strategic Flood Risk Assessment's hazard mapping. Mitigation measures to make a development 'safe' are therefore required.
 - Frampton and Fishtoft Water Recycling Centres, serving the south and east of the town will likely require upgrades to accommodate the site allocations. Phasing of development to ensure that adequate capacity is available to deal with foul water drainage before new dwellings are occupied will be required in order to avoid environmental harm.
 - All of the proposed housing allocations in this area are expected to require improvements to the existing foul sewerage network to enable development to come forward on these sites. Similarly, a number of the proposed housing allocation sites are expected to require improvements to the existing water supply network.
 - Need for relevant sites to obtain Inland Drainage Board's consent to discharge surface water to a watercourse (private or Board maintained).
- Evidence Base
 - Strong evidence should be provided on why some sites are considered undevelopable on land ownership grounds, when this is the only difference between sites which are all exposed to the same level of flood risk.
- Employment Land
 - Site BO005 Riverside Industrial Estate, Boston - objection to the de-allocation of the site as employment land (3 respondents)

- Nature Conservation
 - Acknowledged that a number of sites to the east of Boston, Fishtoft and Kirton are now not included as housing allocation sites which reduces potential impact on land which is functionally linked to the Wash Special Protection Area (SPA).
 - Previous consultation in February it was pointed out that two Sites of Nature Conservation Importance appeared to be missing from the map (Porcher's Pit SNCI and Allen House Pond SNCI). In the case of Porcher's Pit SNCI this is still an omission on the map, however, Allen House Pond has since been reassessed by the Local Wildlife Sites Panel and is no longer classified as a SNCI and therefore does not need adding to the map.
 - There also appear to be errors in the depiction of Havenside as the areas of the site which are Local Nature Reserve appear to be shown as recreational open space rather than LNR. These mapping errors should be corrected.
- Heritage
 - It is likely that all sites in Boston would require archaeological intervention/survey prior to a planning application being submitted, in line with the NPPF.

Spalding and Pinchbeck

- Housing
 - Objections to the proposed allocations north of Vernatts Drain which are contended to be on the wrong side of the river and located away from local services which will result in additional traffic congestion. Housing should be located to the south and west of Spalding where there is easy access to the bypass and routes to Peterborough, Stamford and Bourne.
 - Concerns about impacts on congestion on Spalding Road from proposed developments.
 - Objection to the loss of open countryside/grade 1 agricultural land between Spalding and Pinchbeck.
 - Objection to development in Spalding due to it being in a floodplain.
 - The green buffer at Market Way between Spalding and Pinchbeck is not going to be large enough to provide a distinct separation.
 - The proposals will be an overdevelopment of Spalding.
 - There should be a focus on brownfield development noting potential sites in the town that could come forward for housing.

- Water Resources
 - A number of the proposed housing allocations in Spalding are expected to require improvements to the existing water supply and or foul sewerage network to enable development to come forward on these sites.
 - Initial concerns regarding the increase in the number of housing allocations from 190 to 240 dwellings without the updated SFRA information being available. However, the draft SFRA outputs show that none of the allocations will be subject to flood depths greater than 0.5m, and mitigation of the residual risk should, therefore, be possible. These comments are subject to the caveat that the draft SFRA outputs have not yet been ratified.
- Spalding Western Relief Road (SWRR)
 - A number of the proposed housing allocations in Spalding are expected to require improvements to the existing water supply and or foul sewerage network to enable development to come forward on these sites.
 - Concerns about how development between Pinchbeck and Spalding will be able to fund the SWRR and appropriate transport infrastructure.
 - Concerns that the number and location of the houses proposed have been distorted by the need to find developer money to fund the SWRR.
 - The size of the SWRR safeguarding corridor should be reduced (impact noted on sites where current corridor washes over part of a site).
 - Concerns over the delivery of the central section of the SWRR not being included within the lifetime of the Local Plan.
 - Safeguarding route for the SWRR may impact on playing field land. Should this be the case, any impact on playing field land would need to be addressed in line with NPPF Paragraph 74, in working up any more detailed plans.
 - Concerns expressed with respect to the SWRR and the impact on the gap between Pinchbeck and Spalding. Development should be relocated to Spalding Common (1,000 dwellings) with funding from that development contributing to the southern end of the SWRR. The northern end of the SWRR should be built at a later point in the Local Plan period.
- Retail Development
 - Significant retail development on sites located outside the settlement boundary should be resisted as they are at the bottom of the retail hierarchy and contrary to NPPF.
 - Holland Market and Winfrey Avenue Retail Parks (including land to the north) should be included as a preferred site for additional retail development, due to its location, accessibility, being directly adjacent to

the current town centre boundary and well served by public transport. The Spalding Primary Shopping Area and Spalding Town Centre boundary should be extended to allow for retail expansion at this location.

- The town centre has inadequate road provision and management. This could be improved by a bridge over the railway at Winsover Road and associated demolition and redevelopment to create a more high-rise commercial district to provide an easy link to the old centre as well as providing the quantity and quality of retail to serve the additional population.
- Support for Springfields Outlet Centre and associated Exhibition Centre/ Festival Gardens site in Spalding to provide the identified retail need for comparison goods floor space for the Local Plan; the centre should be included within the settlement boundary of the town.
- The Town Centre boundary should be redrawn to include the Magistrates' Court and straight along Double Street to Herring Lane; and redraw the Primary Shopping Area and Primary Shopping Frontages to include Station Street, New Road, the third side of the Sheep Market, the east side of Broad Street (to Herring Lane) and the other side of Bridge Street.
- Policy support for Site SHR001 should be provided as the site is suitable and capable of delivering retail development during the Local Plan period as part of a comprehensive scheme for the expansion of the town centre adjacent to Holland Market Retail Park.
- Objection to the rejection of Site SHR002 as a proposed retail allocation.
- Objection to the rejection of retail development at land at Yews Farm.
- Green Space/ Open Space
 - The following existing recreational open spaces are still unmarked and should be coloured green:
 - a. Pinchbeck Road - the playing field immediately behind the Garth School;
 - b. Pinchbeck Road - the large playing field alongside the above to the north; and
 - c. Spalding Common - the Community Centre's playing field on the east side of the B1172.
 - Spalding does not have enough recreational green space and the following should be designated: the former Gas Works site, a space potentially linkable to the Castle Field to create an open park-like amenity; and the north end of Cowbit.

- Employment Land
 - Support for designation of land at Wardentree Lane as Proposed Main Employment and Existing Employment Areas.
 - Support for the inclusion of the site at Moortoft Lane/Wardentree Lane, Pinchbeck, as a 'main employment site'.
 - Support for recognition of Clay Lake as an employment site but request that there is a flexible approach to mixed-use development at employment locations. Request that the proposed allocation is extended to the north, to incorporate the area of land between the existing development at Clay Lake and the Coronation Channel and Childers' South Drove.
 - Support the recognition of the Lincs Gateway as a prestige employment site and business park but request that it is identified for mixed-use development to include comparison retail, sui generis and residential uses.
- Nature Conservation
 - It is important that existing and candidate designated sites of nature conservation interest are protected and enhanced. Sites of nature conservation interest and other areas of natural green space should be buffered, extended and linked across the landscape to enable species and habitats to adapt to climate change.
- Policies Map
 - Cowbit Wash Site of Special Scientific Interest (SSSI) has been incorrectly identified on the map as a National Nature Reserve.
 - Arnold's Meadow nature reserve has been identified as recreational open space in addition to its designation as a Local Wildlife Site (LWS). Considered that it is not appropriate to categorise the site as recreational open space and therefore request that this site is shown only as a LWS.
- Provision for Cycling
 - It is requested that a bridge or bridges that are suitable for cycling west of the B1356 is/are provided within the sustainable urban extension north of the Vernatt's drain, and that the Local Plan is amended to reference this.
 - Support the inclusion of the cycle route between Spalding and Pinchbeck on the Inset Map, but request that the text of the Local Plan is amended to require the delivery of a route as part of the development of the SUE.
 - Two notations should be used to show cycle routes on the map, rather than one.

Main Service Centres

- All Main Service Centres

- It is likely that there will be requirements for upgrades to existing water supply and foul sewerage networks to enable development to come forward on preferred sites.
- Crowland
 - There is a need to apply updated flood risk information to inform further analysis of the sequential test and exceptions test for sites.
- Holbeach
 - Query accuracy of information with respect to bus services.
- Kirton
 - Acknowledged that a number of sites to the east of Boston, Fishtoft and Kirton are now not included as housing allocation sites which reduces potential impact on land which is functionally linked to The Wash Special Protection Area (SPA).
- Long Sutton
 - Query raised with respect to the Local Nature Reserve (The Shrubberies) and its designation as a recreational open space.
- Sutterton
 - Welcomes new development but notes the need to account for flood-risk issues and additional services (e.g. new village hall).
 - Concern that objections from previous round of consultation suggesting Sutterton should be reclassified as a Minor Service Centre have been ignored, citing lack of infrastructure as a key constraint to significant new development.
 - Specific sites identified that would require further archaeological investigation.
 - Based on the information the Environment Agency holds regarding discharge flows and permitted headroom at the Waste Water Recycling Centre serving this settlement, we would advise you to consult with Anglian Water Services regarding capacity to accommodate effluent from the number of dwellings to be allocated.
 - Suggestion that it would be better to allocate a number of smaller sites rather than the single allocation currently suggested.
 - Proposal suggested for land to the south of the A17 on Sutterton Roundabout be removed from the 'Countryside' designation currently identified in the emerging Local Plan and allocated for mixed-use development.

- Sutton Bridge
 - Note the need for additional green space.
 - Change of designation suggested for West Bank Business Area: from employment to residential to tie in with new marina.
 - Proposals for Little Sutton Industrial Estate do not adequately deal with access issues to the A17.
 - Changes to proposals for Wingland Industrial Site supported.
 - The 'shopping area' should remain as previously designated or at least as far along Bridge Road as the former Post Office.
 - Concern expressed about the need for Conservation Area designation.
 - Land north of the Port – identify that no development of this area has taken place in the last twenty years. If it is not removed from the Local Plan we request that a policy is put in place to ensure that the land is not developed until a new access road is built. The West Bank is not capable of taking any more traffic and it will have the additional traffic and parking for the Marina.
 - Potential missed opportunity to enhance area at East Bank Lighthouse for wildlife and conservation and improvements to the coastal walks.
 - There should be more policies included to protect the environment.
 - The Inset Map contains a number of inaccuracies and anomalies and the Joint Strategic Planning Committee are urged to review it and ensure it is correct for the next stage of the process.
 - Noted that the number of dwellings to be allocated to this settlement has increased from 180 to 210 in spite of Sutton Bridge being at high risk of flooding from the tidal River Nene. Acknowledge the proposed allocation is the most sequentially preferable in flood-risk terms.
 - Support expressed for the recognition of the port as a restricted use site. Note that land to the north of the existing port is identified as a 'proposed restricted use site', but the land identified within the red line does not reflect the actual extent of the four extant planning permissions on site.
 - Concern that the area of land allocated for possible future commercial use off Centenary Way, Wingland, remains too small. Support industries for the existing food producers should be welcomed. Suggest that a clause saying that any business wishing to locate itself near those industries would be both welcome and good and sustainable in environmental terms.
 - Comment on the designated shopping area for Sutton Bridge noting that the highest concentration of commercial premises consists of the Pharmacy, the Fish Shop, the Newsagent/Corner Shop and the Pub, at

the junction of Bridge Road and Railway Lane. Suggests the inclusion of the 'old' Post Office is odd, since it is closed and currently on the market as a residence.

- Swineshead
 - Main focus of comments on Site Swi004 (see Housing Paper for details)
 - Swi004, 018, 015 & 038: likely that these would require archaeological intervention/survey prior to a planning application being submitted, in line with the NPPF.

Minor Service Centres

- All Minor Service Centres
 - Likely that there will be requirements for upgrades to existing water supply and foul sewerage networks to enable development to come forward on preferred sites.
- Bicker/ Butterwick/ Old Leake
 - Archaeological investigations are recommended to accompany any planning applications for sites in these settlements.
- Cowbit
 - Noted that the number of dwellings to be allocated to this settlement has increased from 80 to 120. Cowbit is at a high risk of flooding from the tidal River Welland and associated washlands. Need to review allocations in the light of the emerging findings from updated SFRA.
- Deeping St Nicholas
 - Suggestion that the village should change from “minor service centre” to “other service centre”.
- Fishtoft
 - Acknowledged that a number of sites to the east of Boston, Fishtoft and Kirton are now not included as housing allocation sites which reduces potential impact on land which is functionally linked to the Wash Special Protection Area (SPA).
- Gedney Hill
 - Concerns regarding the capacity to treat foul sewage within this settlement. Note that there are no mains drainage facilities under the jurisdiction of Anglian Water Services and that the District Council is the permit holder for 4 permitted discharges in the settlement.
- Moulton

- A number of sites identified as preferred sites for housing or employment are adjacent to sites of designated nature conservation value including Site MO001 (Local Employment Site) adjacent to the Moulton Park and River Local Wildlife Site.
- Moulton Chapel
 - Based on the information the Environment Agency holds regarding discharge flows and permitted headroom at the Waste Water Recycling Centre serving this settlement, we would advise you to consult with Anglian Water Services regarding capacity to accommodate effluent from the number of dwellings to be allocated.
- Quadring
 - Main focus of comments is on Site Qua003 (see Housing Paper for details)
 - Potential impact of national policies on immigration (post Brexit)
- Surfleet
 - Support for the designation of Surfleet and Surfleet Seas End as one settlement.
 - Error on the map as Surfleet Lows SSSI has been incorrectly shown as a National Nature Reserve. This should be amended to show the site as a SSSI.
 - Concerns regarding the increase in allocations from 150 to 180 dwellings, although acknowledges that this is in part due to realignment of settlement boundary. The following comments are based on the draft outputs of the updated Strategic Flood Risk Assessment, which have not yet been ratified. However, we would recommend that you use this data to review your Sequential Test evidence for the site allocations.
- Tydd St Mary
 - Revised reduction in preferred housing sites welcomed and accept the new figure of 40 new dwellings in the parish during the life of the Local Plan. However, expresses a wish to see housing that is affordable for young local families so that they can remain resident in the parish in which they were born if they so wish.
- Wigtoft
 - Based on the information the Environment Agency holds regarding discharge flows and permitted headroom at the Waste Water Recycling Centre serving this settlement, we would advise you to consult with Anglian Water Services regarding capacity to accommodate effluent from the number of dwellings to be allocated.

Other Service Centres and Settlements

A small number of comments were received with respect to settlements where no allocations are proposed but settlement boundaries have been identified to enable decisions to be taken on any additional development proposals that do come forward over the Local Plan period.

- Amber Hill
 - Playing field identified on the proposals map should not be designated as a playing field (school closed in 2010).
- Benington/ Fosdyke/ Freiston/ Gedney Church End and Black Lion End/ Haltoft End/ Holbeach Drove/ Holbeach Hurn/ Northgate and West Pinchbeck/ Shepeau Stow
 - A number of additional housing sites identified and promoted for development
- Gedney Church End and Black Lion End
 - Support for the intention to not allocate specific housing allocations in the settlement
- Haltoft End/ Holbeach Drove/ Holbeach Hurn/ Northgate and West Pinchbeck/ Shepeau Stow
 - Suggestions made with respect to changing the settlement boundaries to accommodate potential housing proposals or existing development.
- Northgate and West Pinchbeck
 - Fen Slife nature reserve has been identified on this map as recreational open space in addition to its designation as a Local Wildlife Site. Suggest that it is inappropriate to categorise the site as recreational open space.

5. Other Comments

- Sustainability Appraisal
 - General comment on the requirement to apply sustainability appraisal to the Local Plan
- Concern expressed about the approach to assessing heritage assets when considering site allocations
- Infrastructure
 - Noted that the baseline information on infrastructure is an outline version and the need to ensure up-to-date evidence (specifically with respect to sports provision and open space)

- Query as to why there is no bypass for Boston
- General comment on the need to meet the test of soundness for Local Plans
- Duty to Cooperate
 - General comment on the need to meet the duty to cooperate requirement
 - Norfolk County Council considers there are no strategic matters that require to be addressed by the duty to cooperate.
 - Borough of King's Lynn and West Norfolk notes the level of cooperation has been proportionate to the significance of the cross-border issues, and has met the requirements of the Duty to Cooperate.
- Suggested there has been a failure to account for the latest climate change allowances to be applied flood risk assessments, published in February 2016
- Glossary
 - Include a reference to Starter Homes
 - Include a reference to heritage assets
- Policies Map
 - Moulton Marsh Local Wildlife Site also identified as a recreational open space. Suggest that it is inappropriate to categorise the site as recreational open space.
- Other general comments
 - Need to account for surface water and groundwater flooding when considering allocations
 - Strategic Highways network (A1 and A47) are both noted to be relatively remote from the Local Plan area and hence further consultation of Highways England is not considered necessary.