

Part A: Personal Details

*If an agent is appointed, please complete only the Name and Organisation boxes for the client in 'Your Details', but complete the full contact details of the agent.

	Your Details	Agent's Details* (if applicable)
Name (including title):	Ian J. Canham Chief Executive	Alister Hume Director
Organisation (where relevant):	Broadgate Builders (Spalding) Ltd	Hume Planning Consultancy Ltd
Address:	[Redacted]	[Redacted]
Post Code:	[Redacted]	[Redacted]
Telephone number:	[Redacted]	[Redacted]
Email address:	[Redacted]	[Redacted]

NOTE:
Representations will only be accepted that refer to a proposed change shown in the Schedule of Proposed Main Modifications to the Pre-Submission Draft Local Plan (2017), the map changes or to the Habitats Regulations Assessment Report, incorporating Main Modifications (2017) or Sustainability Appraisal Report, incorporating Main Modifications (2017).
Your responses on the above documents will be sent to the Planning Inspector without prejudice to the Inspectors final report.
You should not repeat or re-submit your previous representations, these have already been considered by the Inspector during the examination process.

PART B: Your representations

Please use a separate form for each representation.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM01):

MM 04

Description of the proposed Main Modification (e.g. Page 60, Section 8)

Page 24 – SP3

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is:

Legally compliant?

Please select one answer

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

Sound?

Please select one answer

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Justified?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Effective?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Consistent with national policy? Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation and any suggested changes.

B4. Please give details of why you consider the Local Plan is not legally compliant or is unsound? If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representations.

Proposed MM 4 24-SP3 raises the Objectively Assessed Need to 9620 homes as a starting point for delivery 2011 to 2031 which is supported. The housing target for the plan period is then netted down to 7819 dwellings for the plan period. This target is stated to be a minimum figure (Amended Table A page 8), not a ceiling and this gives some flexibility for windfall opportunities and is supported by Broadgate Homes.

Please be as precise as possible.

B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please be as precise as possible.

B6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment in respect of this particular modification?

N/A

Please be as precise as possible.

PART B: Your representations

Please use a separate form for each representation.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM01):

MM 04

Description of the proposed Main Modification (e.g. Page 60, Section 8)

Page 26 – SP3

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is:

Legally compliant?

Please select one answer

Yes

No

Sound?

Please select one answer

Yes

No

B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

‘Sound’ means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared?

Please select one answer

Yes

No

Justified?

Please select one answer

Yes

No

Effective?

Please select one answer

Yes

No

Consistent with national policy? Please select one answer

Yes

No

Your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation and any suggested changes.

B4. Please give details of why you consider the Local Plan is not legally compliant or is unsound? If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representations.

It is agreed that MM 4 26-SP3 should meet the majority of the housing requirement for the district spatially to the inland area (some 6562 homes) away from the coastal zone.

Please be as precise as possible.

B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please be as precise as possible.

B6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment in respect of this particular modification?

N/A

Please be as precise as possible.

PART B: Your representations

Please use a separate form for each representation.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM01):

MM 04

Description of the proposed Main Modification (e.g. Page 60, Section 8)

Page 27-28 – SP3

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is:

Legally compliant?

Please select one answer

Yes

X

No

Sound?

Please select one answer

Yes

X

No

B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared?

Please select one answer

Yes

No

Justified?

Please select one answer

Yes

No

Effective?

Please select one answer

Yes

No

Consistent with national policy? Please select one answer

Yes

No

Your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation and any suggested changes.

B4. Please give details of why you consider the Local Plan is not legally compliant or is unsound? If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representations.

Proposed MM 4 27&28-SP3 states that dwelling distribution is to be proportionally distributed across the inland area of the District in the towns and large villages. This spatial strategy and hierarchy led distribution for housing is supported by Broadgate Homes.

Please be as precise as possible.

B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please be as precise as possible.

B6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment in respect of this particular modification?

N/A

Please be as precise as possible.

PART B: Your representations

Please use a separate form for each representation.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM01):

MM 04

Description of the proposed Main Modification (e.g. Page 60, Section 8)

Page 29 – SP3

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is:

Legally compliant?

Please select one answer

Yes

X

No

Sound?

Please select one answer

Yes

X

No

B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared?

Please select one answer

Yes

No

Justified?

Please select one answer

Yes

No

Effective?

Please select one answer

Yes

No

Consistent with national policy? Please select one answer

Yes

No

Your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation and any suggested changes.

B4. Please give details of why you consider the Local Plan is not legally compliant or is unsound? If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representations.

Proposed MM 4 29-SP3 the coastal/inland split is proposed to be reviewed alongside the rate of delivery of housing by 2022. Broadgate support this additional flexibility should the anticipated planned numbers in these settlements not be delivered. The new Policy MM28 (pages 53, 54 and 55 of proposed mods) is also supported by Broadgate.

Proposed MM 4 29-SP3 reviews the previous housing phasing and the revised projections of 565 homes in the first year and 558 per annum each subsequent year over the plan period (Page 16) is supported by Broadgate.

Please be as precise as possible.

B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please be as precise as possible.

B6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment in respect of this particular modification?

N/A

Please be as precise as possible.

PART B: Your representations

Please use a separate form for each representation.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM01):

MM 04

Description of the proposed Main Modification (e.g. Page 60, Section 8)

Page 29-30 – SP3

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is:

Legally compliant?

Please select one answer

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

Sound?

Please select one answer

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------

B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?

‘Sound’ means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Justified?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Effective?

Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Consistent with national policy? Please select one answer

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
-----	--------------------------	----	--------------------------

Your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation and any suggested changes.

**B4. Please give details of why you consider the Local Plan is not legally compliant or is unsound?
If you wish to support the legal compliance or soundness of the Local Plan, please also use this box
to set out your representations.**

Proposed MM 4 29-30-SP3 sets out the clear criteria (informed by the Sustainability Appraisal base) for the consideration of windfall development which Broadgate support.

Please be as precise as possible.

B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please be as precise as possible.

B6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment in respect of this particular modification?

N/A

Please be as precise as possible.

