

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):		Mr Michael Braithwaite MRTPI
Organisation (where relevant):	Gin Property Limited	Robert Doughty Consultancy Limited
Address:		
Post Code:		
Telephone number:		
Email address:		

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):

Please see the attached table

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

Please see the attached table.

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.

Please see the attached table.

Please be as precise as possible.

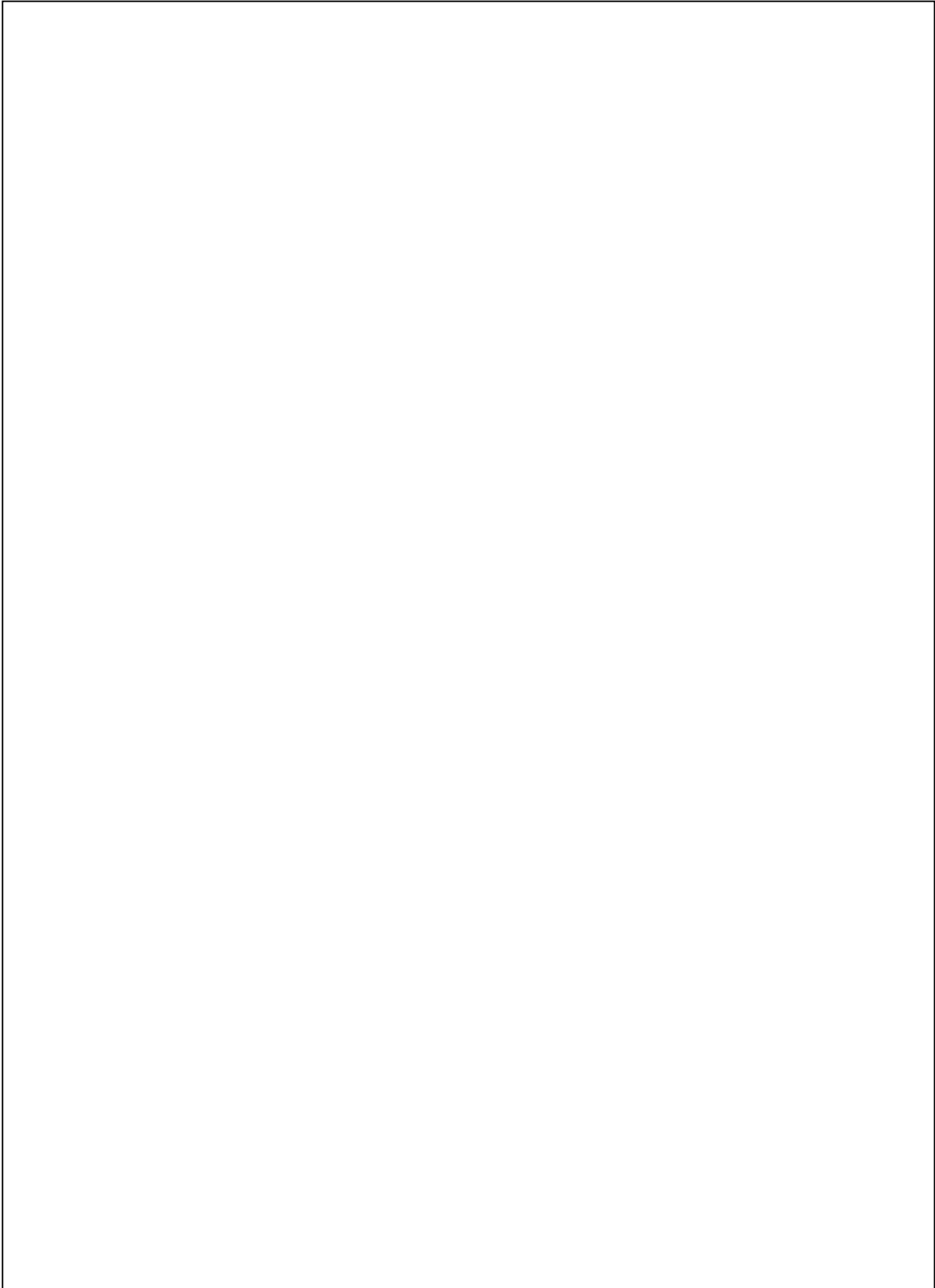
B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

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.

Please see the attached table.

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?

A large, empty rectangular box with a thin black border, intended for the user to provide their comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment.

Please be as precise as possible.

PART C: Notification request

You can request to be notified at an address or email address of any future stages relating to the Local Plan.

C1. Would you like to be notified of future stages?

Yes No

C2. How would you like to be notified?

By post to my address:

By post to my agent's address:

By email to my email address:

By email to my agent's address:

Please select one answer.

C3. Which stages would you like to be notified about:

The publication of the recommendations of Planning Inspector?

The adoption of the Local Plan?

Data Protection Act 1988 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Please see the attached privacy notice. The Town and Country Planning (Local Planning) (England) Regulations 2012, requires copies of all representations to be made publically available, this will be done via the Council`s website. The Council will not publish personal information such as addresses, telephone numbers, or email addresses. By submitting a representation you confirm that you agree to this and accept responsibility for your representations.

Signature:

Date:

Please sign and date your representations.

MAIN MODIFICATION REFERENCE	COMMENT	SUGGESTED CHANGE – IF ANY
MM4 Policy SP3 Page 23 Paragraph 12	We support the changes that confirm that a minimum of 6562 new homes will need to be provided in the inland area. This provides clarity regarding the growth requirements of the Plan area.	
MM4 Policy SP3 Page 24 Paragraph 15	We support the change of wording to clarify the Plan’s approach of distributing growth across a range of settlements to support the existing settlement hierarchy and the distribution of services. This approach meets the core planning principles set out in the National Planning Policy Framework and will deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs. Concentration of growth would lead to the decline of many currently thriving settlements across East Lindsey.	
MM27 Page 121 Policy SP28 New paragraph after 16	We welcome the commitment to update and review the Infrastructure Delivery Plan on an annual basis. This will give the opportunity for Infrastructure providers to review the needs and opportunities of an area and ensure developers are not presented with unreasonable and unjustified demands.	
MM30 Page 7 Para 1.8	<p>We support the commitment to maintain a continuous delivery of housing until the end of the Plan period.</p> <p>We also support the commitment to review the impact of the housing policies in advance of the submission of a revised plan before April 2022. The approach to growth in both the Coastal and Inland areas of East Lindsey is unique in Lincolnshire and represents a significant and understated change. The impact of the new approach on the delivery of sustainable development is unknown and will need to be closely monitored to identify its success and failure.</p>	

<p>MM30 Page 11 Paragraph 2.7</p>	<p>We support the clarification that the growth figures for each settlement are not intended as maximum figures. We understand the discussion at the Hearing Sessions concluded that the table showed the expected capacity of the housing allocations in each settlement, that the figures are not a policy requirement for each site and a different number of dwellings could in fact be provided and did not represent an allocation of growth to each settlement. A minor change to the wording should be promoted to align with MM4 (page 26, policy SP3, paragraph 21 Table B).</p>	<p>"Table A below, shows the capacity of the housing allocations in each settlement. "or similar wording adapted from MM4.</p>
<p>SP20 Page 124</p>	<p>We support the deletion of the references to housing sites SPY303, SPY301, SPY304, SPY306 and SPY305 on the Spilsby inset map. The land to the west of Spilsby is now known by the reference SPY310 and is promoted as a single large-scale development. Deletion of the different site references reduces the potential for confusion.</p> <p>We note and support the update to the Sustainability Appraisal acknowledging the inclusion of five sites in the wider allocation SPY310. The larger site will clearly have a more significant impact on the surrounding landscape than each site individually. The level of demand for housing necessitates the allocation of more than one site. Amalgamating the sites into one allocation, however, provides the opportunity to secure a comprehensive landscape scheme to limit development in sensitive areas in a way that would not be possible if the sites were brought forward individually. A single scheme also has the benefit of enabling a comprehensive approach to drainage, pedestrian circulation, highways etc, which will provide a greater benefit than the development of smaller sites in isolation.</p> <p>Promotion of the single allocation is a key way to ensure delivery of the necessary homes, at the appropriate time and in sustainable location. Updating the Sustainability Appraisal is a key measure to delivering a sound plan.</p>	
<p>MM47 Page 123</p>	<p>We support in principle the replacement of the last paragraph of the settlement text for Spilsby. For clarity, however, the reference to the road to the east of the town could be misleading, as it may suggest that a relief road or bypass is anticipated. The wording should be replaced using the text box for sites SPY301,</p>	

	<p>SPY303, SPY304 and SPY305 that say,</p> <p>“A vehicle link connection between Ashby Road and the B1195, relieving pressure from the town centre ...”.</p> <p>Support the provision of a new descriptive box for SPY310. Reference is made in the text, however, to the inclusion of a medical centre. We do not doubt that new medical provision is required in the town. Gin Property Limited has entered into positive discussion with the CCG to explore the opportunity to locate the medical centre SPY310. We understand that the CCG has committed to relocating the medical centre on this site. As stated above in response to MM31, however, it is possible that the need for health services may be met in some other way, elsewhere in the town, hence removing the need for delivery of the facility as part of this development. As such, the wording should be revised to acknowledge the possibility that health facilities could be provided elsewhere and, if so, the need for SPY310 to provide another facility would be removed. The wording should reflect this possibility and not insist on the provision of a health centre if the need has gone.</p> <p>We note the reference in “Deliverability of the site” to the owner. Gin Property Limited has an interest in the site, but does not own the land.</p>	
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