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):	Mr David Sims	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 <u>not</u> 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 nur commenting on from the Schedule of P Modifications (e.g. MM01):	Please see the attached table	
Description of the proposed Main		
Modification (e.g. Page 60, Section 8)	Please see the attac	hed table
Please complet	e a separate form for eac	h 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.

Please see the atta	iched table.		

B4. Please give details of why you consider the Local Plan is not legally

compliant or is unsound?

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.

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?

	odification?	

B6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations

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 stag	ges?		
Yes	No			
C2. How would you li	ke to be notified?			
By post to my address:				
By post to my agent's a	ddress:			
By email to my email ad	ddress:			
By email to my agent's	address:			✓
		Please s	elect on	e answer.
C3. Which stages wo	uld you like to be notified	about:		
The publication of the range of	ecommendations of Planning			√
The adoption of the Loc	al Plan?			✓
Representations cannot notice. The Town and C 2012, requires copies o	1988 and Freedom of Info be treated in confidence. Plann ountry Planning (Local Plann f all representations to be ma `s website. The Council will r	ease see t ing) (Engl ade public	he attac and) Re ally ava	thed privacy gulations ilable, this will
such as addresses, tele	phone numbers, or email add	dresses. B	y submi	tting a
Signature:		Date	:	14/2/18

Please sign and date your representations.



East Lindsey Emerging Local Plan Proposed Main Modifications (2017) Consultation Mr Sims, Burgh Le Marsh, Site BLM 318

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.	
MM4 Page 26 Policy SP3 Paragraph 32	We support the new emphasis on the benefit of windfall development in supporting local communities and to meet the Local Plan Growth targets. We note the Plan will no longer include a figure for the expected contribution from windfall and that the Council is reviewing its monitoring procedures in order to quantify the past and expected future contribution from this form of supply. It is important to confirm the Council's continued support to windfall development.	
MM4 Page 30 SP3 Clause 5	Support the introduction of the definition of "appropriate locations for new growth". This provides useful clarity in the assessment of potential windfall sites.	



East Lindsey Emerging Local Plan Proposed Main Modifications (2017) Consultation Mr Sims, Burgh Le Marsh, Site BLM 318

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.	
MM28 Page 122 New Policy after SP18	We support the new policy commitment to review the impact of significant new policy approaches, specifically the introduction of constraints to development in the Coastal Area and to submit a revised plan by April 2022.	
	The new policy approach is a significant change and the impact on the affected communities must be monitored closely to ensure the policy is having the expected effect and any unforeseen negative impacts are addressed promptly and effectively.	
MM30 Page 11 Table at Paragraph 2.7	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).	"Table A below, shows the capacity of the housing allocations in each settlement. "or similar wording adapted from MM4.



East Lindsey Emerging Local Plan Proposed Main Modifications (2017) Consultation Mr Sims, Burgh Le Marsh, Site BLM 318

MM31 Pages 13 and 14 New policy after paragraph 2.12	We support the principle of including a new policy to list all the housing allocations in each settlement across the plan area. This approach provides essential clarification within the Plan of the status of the various allocations shown on the amended policies map. The Policy provides an ideal opportunity to identify factors to be considered when promoting the development of individual allocated sites. The commentary regarding site Burgh Le Marsh BLM 320 provides clarification regarding the acceptable form of development of the allocation and confirms there are no known constraints on other allocations in the settlement, including BLM318.	
SP3 Page 23 And MM35 Pages 23 and 24	We support the deletion of Site BLM310 from the Burgh Le Marsh inset map. The site has many constraints that would undermine the delivery of development on the site. The retention of the BLM310 would obscure clarity regarding the development aspirations in the settlement and could have delayed delivery of other allocated sites, such as BLM 318, which does not suffer from any such constraints.	