

## 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):	Jack Mowbray Estate	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.

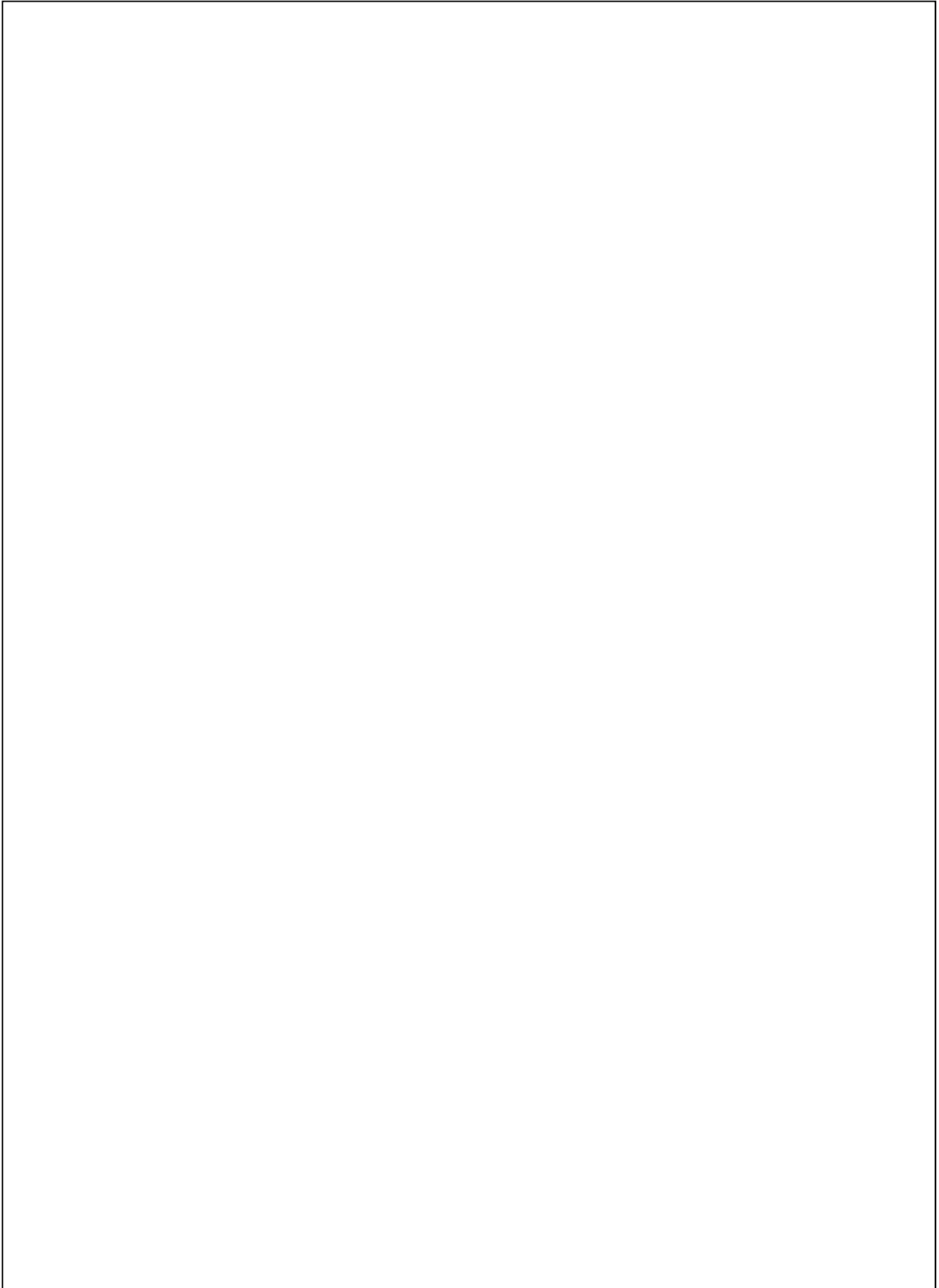
B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

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?



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:

15/02/18

Please sign and date your representations.

MAIN MODIFICATION REFERENCE	COMMENT	SUGGESTED CHANGE – IF ANY
<b>MM4</b> <b>Policy SP3</b> <b>Page 23</b> <b>Paragraph 12</b>	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.	
<b>MM4</b> <b>Policy SP3</b> <b>Page 24</b> <b>Paragraph 15</b>	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.	
<b>MM4</b> <b>Page 26</b> <b>Policy SP3</b> <b>Paragraph 32</b>	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.	
<b>MM4</b> <b>Page 30</b> <b>SP3</b> <b>Clause 5</b>	Support the introduction of the definition of “appropriate locations for new growth”. This provides useful clarity in the assessment of potential windfall sites.	

<p><b>MM6</b>  <b>Page 32</b>  <b>Policy SP5</b>  <b>Paragraph 4</b>  <b>and clause 1</b></p>	<p>We welcome the new supporting text and amendment to clause 1 of Policy SP5 to ensure new housing for the elderly will be allowed in the coastal area, over and above the existing commitments, if it meets an evidenced need for those people already living in the coastal area or it is necessary for them to move to be near families who already live in the area.</p> <p>This measure acknowledges the reality that specialist needs may not otherwise be met due to the wider restriction to new development in the coastal area. Failure to meet this need would lead to existing residents having to move away from family and other carers, and the Plan would fail to meet the social dimension of sustainable development set out in paragraph 7 of the NPPF.</p> <p>The changes are a sensible measure to predict and address unwanted implications of the new policy approach to the coastal area.</p>	
<p><b>MM18</b>  <b>Page 86</b>  <b>Policy SP18</b></p>	<p>We welcome the changes to Clause 3 of policy SP18. The previous expectation that housing need can only be evidenced by reference to the Council’s waiting list is overly restrictive. Whereas the Waiting list is a useful source of information, it is not the only source. Some people will have very real and specific needs for housing that is not currently available, either to buy or rent and they may not qualify for Council housing. Limiting evidence to the waiting list would deny these people the same opportunities as others with a definite need. The proposed wording will help ensure communities continue to thrive and deliver the sustainable development required by NPPF.</p>	
<p><b>MM27</b>  <b>Page 121</b>  <b>Policy SP28</b>  <b>New paragraph</b>  <b>after 16</b></p>	<p>We welcome the Policy 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.</p>	



<p><b>MM28</b>  <b>Page 122</b>  <b>New Policy</b>  <b>after SP18</b></p>	<p>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.</p> <p>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.</p>	
<p><b>MM19</b>  <b>Page 133</b>  <b>Annex 1</b></p>	<p>We welcome the clarity provided by the inclusion of a new annex to define the types of vulnerable groups in terms of the operation of Policy SP7 in the delivery of affordable housing across East Lindsey, including the Coastal area. Meeting the needs of these groups, including the young, single parents, the elderly, etc will be essential in maintaining local communities and meeting the social dimension of the NPPF. If large groups of local people are made to move away to meet their housing needs, this can have a significant impact on the economy, as the workforce may shrink, and the costs of care, if vulnerable groups cannot stay close to families and carers.</p>	
<p><b>MM30</b>  <b>Page 7</b>  <b>Para 1.8</b></p>	<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 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>	