

Comments on South Kesteven Core Strategy 'Further Proposed Changes (to ...Monitoring and Delivery)'

General Comments

Although Policies H3 and H4 have been amended and are now included in Appendix 1 with specific targets, it would appear that this is not proposed for the other policies. In responding to the consultation on matters to be discussed at the examination in November 2009, the County Council identified the need for the targets to be further developed and justified instead of just having in place terms such as "maximise", "minimise" and no "target." Therefore, Appendix 1 should include more targets where key land allocations are put forward for employment and the percentage of development on previously developed land should apply to all of South Kesteven and not just Grantham.

Also, the Annual Monitoring Report (AMR) of the Core Strategy should also include the need to acknowledge where targets are not being met and what may be necessary to overcome this issue, and this should be supported with a data analysis and a policy commentary. Therefore, whilst Appendix B does include a monitoring and implementation framework, it would benefit if it also included an analysis of performance. This would provide an assessment as to the degree to which the plan and policies have been realised, or could be.

Policies H3 and H4

Lincolnshire County Council broadly supports the proposed changes to Policy H3 and the clarification provided by the additional supporting text. The following factual amendments are needed, however, to paragraph 5.3.4 (SKCS84):

1. "Peterborough HMA" should read "Peterborough Partial HMA" in this context.
2. replace "planning gain" by "planning obligations" for consistency with the term used in current statute and national policy
3. RHPs stands for Registered Housing Providers
4. Delete "HMA" after "40% of the" as it duplicates wording in the same sentence.

Now that this paragraph and Policy H3 itself specifically take account of viability issues it is not clear why the target remains expressed as 'up to 35%' on each scheme. It is clear from the supporting text, the revised monitoring indicator and evidence presented at the hearing that 35% is to be monitored as an average across the District, and that up to 40% can be achieved in parts of the District. The target could be better expressed in Policy H3 as 'at least 35% ...subject to viability assessment as set out in (SKC85) and the Affordable Housing SPD.'

SKCS85 should refer only to “planning application sites for market housing”, not to “development sites”. On sites proposed for 100% affordable housing Policy H3 requirements will have already been met.

The requirement for the list of bullet points under the new paragraph under 5.3.4 is not clear; it is perhaps not appropriate for the Core Strategy to provide such detail on the relevant considerations. However, should the Inspector judge that this level of detail is required, it is suggested that the text should not be so prescriptive as to exclude other considerations but, where factors are listed, it should be clear that these factors are relevant. An indication of appropriate wording is provided below with “track changes”:

- ‘...The viability assessment ~~will~~ **is likely to** consider the following ~~key~~ elements:
- Site considerations (including land value at time of assessment **in its existing use**)
 - Local sales values and development costs, **including a reasonable level of developer profit.**
 - Policy constraints (e.g. cost of compliance with other LDF policies)
 - Scheme mix (~~eg~~ **e.g. design, mix of land-uses**, type and tenure of housing)
 - Abnormal site development costs, **including demolition and remediation of contaminated land**
 - Necessary infrastructure costs
 - ~~Greenfield / brownfield site~~
 - Affordable housing assumptions (ongoing management and maintenance costs)
 - Availability of public funding, **although it should not be assumed that funding will be available**’

The addition of ‘existing’ with reference to land values is considered appropriate. It should at least be clear whether existing or alternative use value is to be assessed. There must be reference to developer’s profit at some point in the new paragraphs. The ‘greenfield / brownfield’ reference is irrelevant because it is related abnormal costs such as contamination and demolition that make many but not all brownfield sites more challenging to redevelop when compared to most greenfield developments.

In the last sentence of SKCS86 the reference to ‘the size, scale and mix of development proposed’ is confusing as it follows similar wording above and it is the DPD and AAP themselves which will ‘propose’ those factors. It is suggested that those words be deleted for clarity.

In SKSC90 there is a typographical error: ‘2012-2117’. It is assumed that this should be 2017.

Infrastructure Delivery

Lincolnshire County Council welcomes the additional detail on infrastructure provided by the further proposed changes. However, some further amendments should be made to ensure that the Core Strategy delivers 'positive outcomes' for the district and, in particular, is deliverable and flexible.

Single Conversation and Growth Fund

The following sentence (currently at paragraph 7.37 under 'East-West Relief Road, Grantham') would be better placed under 'Contingencies':

'In addition the Single Conversation Local Investment Plan for Grantham, which has been agreed between the District and County Councils and the Homes and Communities Agency, provides the opportunity for resource intervention to support the delivery of key identified strategic projects and sites, including the provision of critical infrastructure.'

"Single Conversation" Local Investment Plan funds (if forthcoming from the HCA – funding has yet to be granted by the HCA) and other Growth Point funds would not usually be "ring-fenced". For clarity and to more clearly justify the Strategy, the changes should refer to this potential additional funding more generally; acknowledging that such funds could also support the Core Strategy by funding the Pennine Way Link, one of the proposed schools or other such infrastructure.

Appropriateness of Reviewing the Core Strategy

At paragraph 7.44, it is suggested that if critical infrastructure is not provided in a timely manner then consideration will be given to the review of the Core Strategy. This is contrary to the principles in PPS12 (as set out at paragraph 4.46 which promotes flexibility). It is considered that more appropriate alternatives would be:

1. to attempt to reprioritise investment to bring forward infrastructure more quickly;
2. to find alternative means of investment or alternative infrastructure;
3. to allocate alternative housing sites around Grantham where sufficient infrastructure can be provided; or,
4. to allow some development to be taken forward on the basis of a staged approach to infrastructure provision.

The Council cannot rely on a timely review of the Core Strategy. It is likely that significant development pressure will continue while a review is progressed. Current national policy (PPS3) and regional policy (East Midlands Regional Plan) together require 3,400 new homes in South

Kesteven in the next five years. If the allocated sites in this Core Strategy prove unable to deliver the 3,400 then the Council might face the prospect of fighting and losing appeals against unwanted proposals. This could, for example, include schemes in Stamford or Bourne, which would be contrary to the proposed approach of concentrating development towards Grantham.

Infrastructure Delivery Schedule

The schedule and supporting text are not in all cases sufficiently detailed in setting out 'who will provide the infrastructure' or 'responsibilities for delivery' (PPS12: paragraph 4.8 to 4.9). It is welcome that, in some cases, the supporting text does clearly explain that the majority of funding would, for example, come from developer contributions. However, the schedule's 'potential funding sources' and 'delivery agency and partners' column implies that any of the list's sources or organisations could be used.

For clarity and for ease in negotiating "section 106 obligations" / setting of Community Infrastructure Levy, the text or the schedule should clearly identify the expected level of funding (at least as a range) to come from each source or partner. Adding this information on the expected level of funding would require sufficiently flexible policies that would allow for monitoring and review, in line with the comments made above.

The Schedule does not include the proposed £2m public investment in Grantham market place. The proposals are for investment in pedestrian improvements and street furniture. This could be understood as 'physical infrastructure' for the purposes of PPS12, paragraph 4.8. The investment will certainly underpin Grantham's role as a sub-regional centre and therefore supports the proposed Core Strategy and the existing Regional Plan.