

Introduction

1. The Council's proposed 'Monitoring and Delivery' chapter, set out at Appendix 3 of ED44, contains some useful additions to the text in the Submission Core Strategy, particularly in its identification of the infrastructure constraints to development in Grantham. It also contains an indication of the way in which housing land supply could be managed in the event of slow delivery.
2. However, we are concerned that the Council have not demonstrated that the Core Strategy as proposed will deliver the level of development which the District, and particularly Grantham, requires. In particular, there is still insufficient evidence to provide the necessary level of certainty that the Southern Quadrant SUE can and will be delivered. The Inspector will be aware of the comments made at the Core Strategy Examination hearing sessions, and the guidance contained within PPS12, with regard to the importance attached to the deliverability of Core Strategies. We believe that if the South Kesteven Core Strategy is to be found sound, reference to the Southern Quadrant SUE should be deleted. An alternative strategy should be set out, to identify sites to meet the housing requirement through the Grantham AAP.

Paragraph 7.12

3. The Council have acknowledged at paragraph 7.12 that 'there is a risk that this infrastructure may not be provided', but in the same sentence they state that 'working with service providers and partners the risk that infrastructure will not be forthcoming can be mitigated or addressed at an early stage.' This is a confusing statement, and appears contradictory. The available evidence suggests that there is certainly a risk that the critical infrastructure will not be provided. There is, however, no evidence to support the claim that this risk *can* be mitigated or addressed. For such a claim to be made, it would be necessary to demonstrate that key constraints, and particularly those relating to the timing and funding of critical infrastructure projects, can be overcome.

Sewage Treatment Works (Paragraphs 7.29 – 7.34)

4. With regard to the need for additional capacity in Grantham for sewage treatment works, the proposed text does little to add to the detail in the Council's previous Infrastructure Paper (ED35). Without repeating the points raised in our previous evidence, or at the Examination hearing sessions, we believe that there remains considerable scope for this critical infrastructure to be delayed for some years, and longer than the Council have so far estimated. This in turn would have a knock-on effect on the delivery of the Southern Quadrant SUE, and the Council's housing trajectory at Appendix 2.
5. Paragraph 7.34 states that an interim solution would be a temporary connection to the existing sewer system, and that the Grantham WCS has identified that this 'should not be a problem and is likely to be permitted.' The latest stage of the WCS is 2a, which does not appear to give the certainty which paragraph 7.34 implies. Given the comments of the participants at the recent Matter 11 examination hearing session, this level of certainty had not been attained at that time.

6. This is a critical issue, on which the timing of the Southern Quadrant development may depend, and it would be helpful if the Council could make additional information available. For instance, on what evidence is this statement based? Paragraph 7.34 appears to imply that AWS are 'likely' to permit the connection, but the use of the word 'however' in the final sentence implies that the Environment Agency may not. It is therefore unclear whether this is actually a viable solution, and we suggest that the Council should make any additional evidence they have available, to provide the necessary certainty.

East-West Relief Road (Paragraphs 7.36 – 7.38)

7. The information presented in ED44 does nothing to expand on that previously presented in ED35. In short, the council have yet to identify the funding mechanism by which this road could be delivered, and as a consequence, we do not believe it is sound for the Core Strategy to rely on its delivery.

Pennine Way Link (Paragraphs 7.39 – 7.40)

8. We have commented previously that we believe the Pennine Way link may take significantly longer than four years to deliver. We believe that the Council should give further details of the way in which the anticipated four year timetable breaks down. They should also qualify their comment with regard to their experience of 'similar developments elsewhere', and the reasons as to why these suggest a four year timetable is reasonable.

Contingencies (Paragraphs 7.41 – 7.44)

9. The 'Contingencies' section appears to represent the Council's first attempt to set out the way in which slippage to the timetable for the delivery of critical infrastructure can be addressed. Paragraph 7.41 notes that the proposed mechanism in the Council's amended text for paragraph 5.1.7, which seeks to alter the phasing of allocated sites, or identify additional housing sites as necessary, could help to address any apparent shortfall in delivery. Paragraph 7.42 notes that the infrastructure constraints which affect the proposed SUEs would not form the same type of constraint for small and medium development sites. These conclusions are consistent with our representations throughout the Core Strategy examination process, and we support them.
10. However, we do not agree with the Council's assertion at paragraph 7.43 that both of the proposed SUEs are 'key for the growth of the town.' The Council's revised housing trajectory contained within ED44 indicates that they believe a total of 8,231 dwellings will be constructed in Grantham over the Core Strategy period; this is 1,239 dwellings in excess of the minimum required to be built in Grantham by Policy H1, as amended. The trajectory also assumes that only around half of the Southern Quadrant, a total of 2,100 dwellings, would be built within this period. If it were assumed that the Southern Quadrant were to be delayed, and would only deliver a very small amount of housing during the Core Strategy period, this may only leave a shortfall of a few hundred. We believe that such a shortfall could be made up by development on additional housing sites at Grantham.

11. We therefore disagree with the Council's assertion at paragraph 7.44 that the Core Strategy should be reviewed in the event that critical infrastructure could not be delivered. We are concerned that an approach which allowed for the review of the Core Strategy after only a few years would be unsound, and would not serve the best interests of the District, and particularly Grantham, given its Growth Point status. Paragraph 4.46 of PPS12 seeks to imbue Core Strategies with sufficient flexibility to avoid the need for a review, and notes that they must be flexible in order to be effective. If this Core Strategy were to be reviewed after a few years due to not having delivered housing, it would clearly not have been effective. The subsequent review to the Core Strategy, and perhaps also other DPDs, should also take a significant time, thus further delaying housing delivery.
12. On this basis, it is not acceptable to pursue a strategy which will rely on an early review in the (likely) event that it fails. The Council have outlined the basis for a more flexible strategy in their proposed paragraphs 7.41 and 7.42. The Southern Quadrant SUE is not the only site to have been promoted for residential development at Grantham, and our Client's land at Dysart Road, and other sites, can help to make up any apparent shortfall. These sites can be identified, and phased if necessary, through the Grantham AAP, and the phasing mechanism proposed by the Council for paragraph 5.1.7 of the Core Strategy. As we have noted above, the Council's housing trajectory suggests that any shortfall in the event of the Southern Quadrant not coming forward would be relatively slight.
13. Given the lack of certainty over the delivery of the Southern Quadrant, we believe that it is inappropriate to include it as a strategic site within the Core Strategy. If this site were to be identified by the Core Strategy, it may prevent other sites, which could deliver housing sooner, from coming forward for development in the short to medium-term. This would slow the delivery of housing in Grantham, and harm the town's Growth Point aspirations; it would also undermine the Core Strategy's objectives, and make it unsound.

Infrastructure Delivery Schedule

14. The proposed Infrastructure Delivery Schedule is identical to that which was appended to ED35. This includes a reference to temporary sewage treatment works being a potential contingency solution for the Southern Quadrant SUE. However, such works would require the approval of the Environment Agency, who gave evidence at the final Core Strategy examination hearing session that they would not support the use of these works for the Southern Quadrant. This reference should therefore be removed.
15. It should also be noted that this schedule does not contain any real contingency measures, and the final column should be renamed simply as 'risks', as discussed at the Examination hearing for Matter 11.

TW/937
13 April 2010