Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>489312</td>
<td>Mr Stewart Patience Cambridgeshire County Council</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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Comment ID: SASub39
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: Yes
Unsound because DPD NOT:
Changes to make DPD sound:
Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 474396  Mr Gordon Smith

Consultation Point: Site Allocation and Policies DPD: Submission October 2011

Comment ID: SASub141
Type: E-Mail

Is DPD Legally Compliant: Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Effective

We do not wish to prevent the adoption of the Site Allocations and Policies (SAP) document as it is important to have such a strategy in place. However our view is overall it is too narrowly focussed. We are seeking:

- Amendments of the plan, or
- If substantial additional cannot be carried out before the plan moves to adoption, an explicit commitment from the Council to advance such work with a defined work programme.

Our comments are thereby not ‘show stoppers’.

In general terms, the key objections are:

1. The document is too narrowly focussed. The SAP has a narrow focus on the spatial issues of mostly housing and industrial growth, retailing to some degree. But not leisure, open space and other services necessary to a sustainable community. It is thereby not meeting the objectives of the Core Spatial Strategy to meet the diverse economic, social and cultural needs of the community (CSS objectives 1, 2, 5, 8, 9, 10).

2. Proposals for a northward expansion of the towns are fragmented, with scope for poorly coordinated development. Whilst accepting that these need to be generalised polices, a far greater range of land uses and issues should have been included at this stage. The Council is effectively promoting the establishment of a new neighbourhood with housing and commercial use adjacent, yet the common access, open space and design issues are not clear.

Changes to make DPD sound:
The Council is effectively promoting the establishment of a new neighbourhood with housing and commercial use adjacent, yet the common access, open space and design issues are not clear.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
475706  Miss Clare Sterling
Lincolnshire Wildlife Trust

Consultation Point
Site Allocation and Policies DPD: Submission October 2011

Comment ID: SASub86
Type: Web
Attached Files:

IS DPD Legally Compliant:  No
Legal Compliance Reasons:
The Lincolnshire Wildlife Trust (LWT) is compelled to object to the Site Allocations and Policies DPD on the basis that it has not been drawn up in the context of a robust and credible evidence base. LWT does not believe that the Site Allocations and Policies DPD has been prepared in accordance with PPS9 or PPS12 or the ODPM publication 'Planning for Biodiversity and Geological Conservation – A Guide to Good Practice'.

Is DPD Sound:  No
Unsound because DPD NOT:  Consistent with National Policy
The Lincolnshire Wildlife Trust (LWT) is compelled to object to the Site Allocations and Policies DPD on the basis that it has not been drawn up in the context of a robust and credible evidence base. LWT does not believe that the Site Allocations and Policies DPD has been prepared in accordance with PPS9 or PPS12 or the ODPM publication 'Planning for Biodiversity and Geological Conservation – A Guide to Good Practice'.
The Key Principles within PPS 9 include recognition of the need for development plan policies and planning decisions to be based on up-to-date information about the environmental characteristics of the area (paragraph 1). Under Local Development Frameworks it is stated that 'Local development frameworks should indicate the location of designated sites of importance for biodiversity...' (paragraph 4).

Changes to make DPD sound:
The Lincolnshire Wildlife Trust (LWT) is compelled to object to the Site Allocations and Policies DPD on the basis that it has not been drawn up in the context of a robust and credible evidence base. LWT does not believe that the Site Allocations and Policies DPD has been prepared in accordance with PPS9 or PPS12 or the ODPM publication 'Planning for Biodiversity and Geological Conservation – A Guide to Good Practice'.
The Key Principles within PPS 9 include recognition of the need for development plan policies and planning decisions to be based on up-to-date information about the environmental characteristics of the area (paragraph 1). Under Local Development Frameworks it is stated that 'Local development frameworks should indicate the location of designated sites of importance for biodiversity...' (paragraph 4).
Much of the information on 'sites of regional and local biodiversity interest', variously known as SNCIs, County Wildlife Sites (CWSs) or Local Wildlife Sites (LWSs), stems from surveys carried out some time ago: many sites have not been re-visited for more than twenty years. Sites were selected on the basis of local knowledge but were not assessed against any agreed criteria. Unless a site has been surveyed in detail within the last 5 years the information can not be claimed as up-to-date.
The Lincolnshire Biodiversity Partnership published guidelines compatible with Defra guidance in 2006 (revised 2008) for selection of LWSs in the historic county of Lincolnshire. These enable the assessment of all sites for which there is sufficient up-to-date biological information. Sites meeting the criteria will qualify as the
'local sites’ referred to in PPS9.

In 2006, the Lincolnshire Wildlife Trust worked in partnership with the Lincolnshire Wolds Countryside Service, Natural England, Environment Agency and Lincolnshire County Council to carry out a comprehensive baseline survey of the Wolds AONB. This re-visited sites already designated as SNCIs and also identified additional important sites through a field-by-field (‘Phase 1’) Habitat Survey. Interestingly, quite a few of the sites previously selected as SNCIs would not now meet the new LWS criteria, while previously unrecognised sites are proving to be extremely important for their biodiversity and would qualify. Similarly through volunteers carrying out botanical surveys on roadside verges over the last three summers in the limestone area south of Lincoln the Life on the Verge Project (www.lifeontheverge.org.uk) has discovered many verges that meet LWS criteria including a number in South Kesteven.

Until up-to-date information is available on SNCIs/LWSs in the area covered by your authority, your local development documents will be open to challenge. LWT is concerned that the lack of a robust and credible evidence base means that the Council is not in a position to assess the performance or effects of the Site Allocations and Policies DPD using the Single Data List indicator 160. There is a need for, at least, complete surveys of previously identified SNCIs and their assessment by the Local Wildlife Sites Panel to determine whether they meet Local Wildlife Site criteria. The Trust would welcome discussion on the means to take this forward.

**Participate at Examination:**
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>603273 Mr Kevin Foster</td>
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<td>Site Allocation and Policies DPD: Submission October 2011</td>
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<tr>
<td>SE Lincolnshire Joint Strategic Planning Committee</td>
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**Comment ID:** SASub25

**Type:** Letter

**Attached Files:**

- IS DPD Legally Compliant: Yes
- Legal Compliance Reasons:
- Is DPD Sound: Yes
- Unsound because DPD NOT:
- Changes to make DPD sound:
- Participate at Examination: No
## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>26691 Peter Williams</td>
<td>East Midlands Councils</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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**Comment ID:** SASub2  
**Type:** Letter  
**Attached Files:**

- **IS DPD Legally Compliant:** Yes  
- **Legal Compliance Reasons:**
- **Is DPD Sound:** Yes  
- **Unsound because DPD NOT:**
- **Changes to make DPD sound:**
- **Participate at Examination:** No
I wish to make the following representations in respect of the content of the Site Allocations and Policies Plan and its overarching reliance upon the Local Development Framework for South Kesteven, Core Strategy (Adopted 5 July 2010) which on evidence was implemented through planning policies applied as early as 2005/2006, thereby erroneously extending the policy framework for the Local Development Framework (LDF) by a period to date of 5/6 years. Already the rural villages and hamlets designated as "less sustainable" through the core strategy and its associated planning policies being applied to applications in "infill, extensions and conversion" are being unfairly discriminated against and their human rights to evolve as communities are being denied.

As set out in the Core Strategy page 8, Spatial Portrait of the District, paragraph 1.7.1 "in total approximately 60% of the population lives in the District's market towns: the other 40% residing in the villages and countryside". Within the 100 villages and hamlets a total of 16 Local Service Centre communities have been identified where "development will be allowed in accordance with the Spatial Strategy and subject to the following: Support will be given to proposals and activities that protect, retain or enhance existing community assets or that lead to the provision of additional assets that improve community well-being".

Thereafter the Core Strategy is totally silent upon the remaining 84 villages which when it comes to consultation and determining of planning applications within these communities they are referred to as "less sustainable". This term does not even appear in Appendix C - Glossary to the Core Strategy.

Small wonder that a substantial section of South Kesteven’s population feel they are being denied the opportunity to prolong and promote their settled communities in support of its future generations and rural industries. How are these communities ever expected to break out of the inequitable planning policy constraint that is being applied at the present? Where is the hope for our rural communities if they are not receiving encouragement to exist for the future? What is to happen to the many small enterprises and business that exist within the rural community particularly those that provide direct support to the main industry farming?

The contribution made by the rural communities to every aspect of the District Council’s wellbeing is enormous and one which the urban population place great reliance upon on a day to day basis. Furthermore a good number of successful small enterprises exist within rural areas that provide employment for many who live within the urban environs and travel out to a rural workplace, this is a fundamental contradiction to the Core Strategy whereby increased reliance upon motor transport journeys by the rural population is discouraged and against policy.

More concerning, since the formulation of the Core Strategy has been the practice by SKDC Housing to relocate so called "priority" and "anti social behaviour" applicants into Local Authority housing stock within rural locations thereby denying those deserving local residents the opportunity to remain within their own communities. Key parameters of the Core Strategy Policy H4 have also been overridden in a clearly rural and isolated area whilst other potential planning
Site Allocation DPD: Submission October 2011 - Consultee Comments

applicants within surrounding settled communities are not meeting encouragement to progress due to the parameters of the term "less sustainable" being relied upon by SKDC officers. What is particularly frustrating is that neighbouring District Councils operate no such restrictive policies upon their rural communities which within the guidelines of reasonableness and established policy are permitted to evolve.

I wish all the above observations to be taken into account in the forthcoming Inspectors review of the Site Allocation and Policies Development Plan Document as currently they fail to reflect positive and encouraging strategies to promote our rural communities to the level of recognition they deserve to continue their invaluable contribution throughout the whole area covered by South Kesteven District Council. Currently the term "sustainable" is the subject of national debate as no definition can be agreed upon. In the meantime I believe that the use and reliance upon the term "less sustainable" by SKDC should be examined in depth together with the areas of restrictive policies that contribute to its inequitable approach towards all the rural communities within South Kesteven.

Changes to make DPD sound:
May I specifically request that the term "less sustainable" is removed from the SKDC vocabulary and replaced with an upbeat expression reflecting the way forward for rural communities.

Participate at Examination:
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>26481</td>
<td>Ms Jennifer Dean</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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<td></td>
<td>Anglian Water</td>
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**Comment ID:** SASub202  
**Type:** E-Mail  
**Attached Files:**

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**IS DPD Legally Compliant:**
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective; Consistent with National Policy

**Water Cycle Study**
Anglian Water does not consider the DPD reflects the evidence compiled within the Detailed Water Cycle Study, November 2011. In particular the phasing of the development (DE1a, DE1b and LSC1f) does not reflect the constraints identified within the Detailed Water Cycle Study.

**Encroachment**
Furthermore, as stated through previous correspondence, some sites (such as those in Bourne and Billingborough) lie within the cordon sanitaire of our Sewage Treatment Works. Prior to allocation, an odour assessment should be completed to determine whether there is loss of amenity due to the locality of the Sewage Treatment Works. An adequate buffer should remain between new development and the existing assets in order to ensure there is no loss of amenity and/or our abilities to operate in accordance with the Water Industry Act are not compromised. Anglian Water’s policy regarding encroachment of our assets can be found on our website: http://www.anglianwater.co.uk/developers/encroachment.aspx.

**Surface water management**
Appropriate surface water management would contribute to achieving objective 10 of the Site Allocations and Policies DPD. In accordance with PPS25 and Part H of the Building Regulations, the proposals should secure sustainable surface water disposal applying the Flood Risk Management Hierarchy to ensure infiltration is considered as the preferred option for surface water disposal. Public surface water systems should only be considered when all other methods have been discounted. Appropriate surface water management methods need to be incorporated in master planning at an early stage as it can impact on the layout.

**Unsound: DPD is not Effective, Justified and Consistent with National Policy**
The DPD should be informed by, and reflect, a sound and credible evidence base. Given the document does not reflect the constraints within the Water Cycle Study, we do not consider the plan is effective, justified and consistent with National Policy (PPS1, PPS3, PPS12, PPS23) which require infrastructure led development and consideration of environmental infrastructure.

**Changes to make DPD sound:**
The majority of the area within the DPD is served by combined and surface water sewers. There should be no new surface water connections to the foul and combined system. We recommend surface water separation (rather than continuing to discharge surface water to the combined sewer network) for all brownfield sites will help South Kesteven adapt to climate change and potentially create capacity within the sewer network for proposed development.
We recommend this position on surface water management is reflected within the text of the document.

Participate at Examination:
# Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>26352</td>
<td>Ms Rosemary H Woolley</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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Consultation Point:

- **Comment ID:** SASub30
- **Type:** Letter
- **Attached Files:**

**IS DPD Legally Compliant:** Yes

**Legal Compliance Reasons:**

**Is DPD Sound:** Yes

**Unsound because DPD NOT:**

**Changes to make DPD sound:**

I have been asked by members of the Parish Council to write to confirm that Baston Parish Council is happy with conclusion reached after consultation with the District and Parish in regard to proposed sites within the parish.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: Mrs Pamela Steel

Agent: Site Allocation and Policies DPD: Submission October 2011

Consultation Point:

Comment ID: SASub177
Type: Letter
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons: 

Is DPD Sound: No

Unsound because DPD NOT: Justified; Consistent with National Policy

1a) The new National Planning approach is that decisions are made locally. The New Homes Bonus aims to enable new homes where they are needed and wanted by the community.

The above do not apply to this document. The majority of local residents have little or no knowledge or input in the planning process. SKDC web site is a maze to the uninitiated who are consequently unaware of new issues, deadlines or public exhibitions occurring. I have never seen SKtoday which the council claims to be delivered to every household. Residents and even the Town Council who object to decisions made by SKDC are usually overruled.

1b) Local Plans should reflect the identified evidence-based needs of communities.

It is essential that Housing Market Assessment Studies are carried out in individual local areas in order to form a robust evidence base from which valid housing targets for each area may be set. However SKDC have allocated housing targets across the region based on a SHMA of 2007 covering Peterborough, Rutland and South Holland as well. This was "updated" in 2010 using the 2008 ONS sub national population projections in conjunction with property prices, moving data and changes in the private rented sector to produce generic housing needs and demand across South Kesteven.

NB The Lincolnshire Structure Plan (now superseded) calculated that only 1505 new houses were needed from 2006-2021 and these were to be built in Grantham. Compared to SKDC's estimate of 8250 in addition to those built in Grantham it's obvious evidence needs to be thoroughly researched

3) The National Annual target is that 60% of new housing should be provided on previously developed land. The new site allocations in this document are mostly on greenfield sites.

Changes to make DPD sound:

Housing Market Assessment studies to be carried out in Stamford, Bourne and the Deepings separately and new housing targets drawn up from the data collected. This will ensure that evidence based needs of each area are identified.

Regular information reported in free local newspapers eg The Deepings Advertiser or ensure that SKtoday is delivered to every household.

Calculate what percentage of allocation sites are brownfield sites and ensure that this figure is reasonably in line with national policy.

Identify the exact number of vacant house and buildings in each area and include these in development plans.

Research surveys should be conducted annually to note new residents' experiences in new developments in order to feed into the design improvement process.

This would enable local authorities to listen to the local community and to improve planning.

Green infrastructure policy is too generic and vague. SKDC need to consult with local people and devise a definite plan for each area.
Participate at Examination: No
### Consultee Comments

**Consultee:** SASub105

**Agent:** Mr J M Mettham

**Consultation Point:** Site Allocation and Policies DPD: Submission October 2011

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<th><strong>Comment ID:</strong> SASub105</th>
<th><strong>Type:</strong> Letter</th>
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**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

The document gives considerable detail on Grantham, Stamford, Bourne and The Deepings, and talks about Transport Links to them and beyond to Peterborough and London, with no mention of transport links to the villages and hamlets listed in your documents as Less Sustainable.

No consideration has been given as what the Less Sustainable Villages and Hamlets do until 2026 within their communities. For instance, my village of Fulbeck has a number of companies and employers in engineering, crafts centre, professional people, garden designers, accountants, internet traders, builders, plumbers, publican, construction companies and farmers. Everyone is hoping to expand and generate employment for local people in and around the local community. Local communities are the custodians of the countryside. [see attachment for full text]

**Changes to make DPD sound:**

The opinion of village communities, including Parish Councils, have made it clear to South Kesteven District Council they need a controlled expansion, within the village curtilage, using infill sites and small amounts of Brownfield. We must accept with the world financial situation it would be catastrophic to enforce such a policy on approximately 20,500 people and remove their freedom of choice until 2026.

**Participate at Examination:** Yes
# Site Allocation DPD: Submission October 2011 - Consultee Comments

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**Comment ID:** SASub204  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**
In all Natural England is satisfied with the content, objectives and aspirations made with the Site Allocation and Policies document. We welcome the inclusion of the Habitats Regulations Assessment (HRA) which has concluded that there will be no likely significant effect on the four European sites identified at potential risk. We note that a number of previous allocations have been deleted including those (such as in Castle Bytham) that had the potential to impact on nationally designated sites. We would therefore urge your authority to ensure that any new allocation takes into account the statutory protection that nationally designated sites such as SSSIs receive.

Natural England at this stage would like to commend your authority on the regular and continued consultation process that has been undertaken for the future growth in the district.

**Participate at Examination:**
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<tr>
<td>497391</td>
<td>Mr Tony Aitchison</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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**Comment ID:** SASub36  
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<td>Participate at Examination:</td>
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## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>260141</td>
<td>Ms Rose Freeman</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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**Comment ID:** SASub170  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective

We do not find the document to be effective with regard to the lack of guidance for Use Classes. We are surprised that Use Classes are not included in the Glossary. This document would be the more appropriate place for descriptions of use classes rather than the Grantham AAP. Also the document also has policies for community facilities/assets but is unclear about what this term represents, there being no description in the Glossary and only a few examples in the supporting text. Policy SAP9 on page 57 specifically refers to cultural facilities for mixed use development of the Bourne Core Area but there is no description of what the document classifies as a ‘cultural facility’.

**Changes to make DPD sound:**

The document makes many references to various use classes in policies and supporting text and we suggest an explanation should be included in the Glossary including sui generis. The document is unclear regarding the status of sui generis non-retail development which includes petrol stations, launderettes, taxi businesses etc, all important urban and rural components for residents and visitors. For clarity and greater certainty of intended outcomes and so that guidelines are clear and consistent we recommend a description for this term as - 'Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.' And - 'Cultural facilities provide for the pursuit of arts and music activities and include a range of uses that add greater diversity to the cultural scene, such as concert and theatre venues; museums and art galleries; artists’ studios; street events; public art; community music and dance venues; galleries, and facilities for film and digital media.'

Even if you don’t agree with our understanding of this term it is important that your interpretation is understood in the context of your policies which are intended to serve as clear statements to let communities, developers and others know the basis and criteria by which planning decisions will be made.

**Participate at Examination:** No
IS DPD Legally Compliant:
Legal Compliance Reasons:
Is DPD Sound: No

Unsound because DPD NOT: Effective; Consistent with National Policy

I write as a simple Christian, a member of a world-wide Christian Fellowship generally known as Exclusive Brethren, to ask if you can make the following provisions in your Site Allocation and Policies Development Plan document:

• the erection of places of public worship;
• provision of faith related schools.

Both of these are currently operational in many towns and cities in this country and we would like to ensure that in your policies there is provision for our future requirements if the need arises.

I refer to Paragraph 126 of the National Planning Policy Framework (NPPF) for England, which includes the following words: “to deliver the facilities and services the community needs, planning policies and decisions should plan positively for the provision and integration of community facilities (such as local shops, meeting places, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments”.

Paragraph 127 which refers to schools, in particular “Local authorities should take a proactive, positive and collaborative approach to the development of schools by working with schools promoters to identify and resolve key issues before applications are submitted. In determining planning applications for schools, local planning authorities should attach very significant weight to the desirability of establishing new schools and to enabling local people to do so.”

Changes to make DPD sound:
I write as a simple Christian, a member of a world-wide Christian Fellowship generally known as Exclusive Brethren, to ask if you can make the following provisions in your Site Allocation and Policies Development Plan document:

• the erection of places of public worship;
• provision of faith related schools.

Both of these are currently operational in many towns and cities in this country and we would like to ensure that in your policies there is provision for our future requirements if the need arises.

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<tr>
<td>497324 Mr Chris Evans</td>
<td>Ministry of Defence</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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**Comment ID:** SASub31  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

The MOD has no comments to make regarding the Submission DPD.  
I can therefore confirm that the MOD has no objections to the South Kesteven Local Development Framework however please continue to consult this office on any developments that fall within the safeguarding consultation zone.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
605795
Stamford Property Company Ltd

Agent
396969  Mr Matthew Bagnall
D L P Planning Ltd

Consultation Point
Paragraph (1.1.5)

Comment ID: SASub94
Type: Web
Attached Files:

Is DPD Legally Compliant:  Yes

Legal Compliance Reasons:

Is DPD Sound:  Yes

Unsound because DPD NOT:

Changes to make DPD sound:
These submissions are made on behalf of Stamford Property Company who have interests in land known as Newstead lying to the east of Stamford. Stamford Property Company have previously promoted Newstead as suitable for allocation for mixed use development including residential and employment uses, and supporting facilities such as a local centre, strategic and local open space, landscape enhancement and an eastern distributor road.

In particular we support the criteria set out at paragraph 1.1.5 to the effect that new housing allocations should:
• maximise the use of public transport, cycling and pedestrian links and create opportunities for improved accessibility
• offer access to appropriate existing services and infrastructure with capacity to support development
• minimise potential impact on wildlife sites, protected species, biodiversity, historic assets, archaeology, water quality, landscape character, TPOs and open spaces
• be capable of being absorbed into the existing built form with minimal visual impact on the surrounding landscape, and
• not be adversely affected by significant known constraints such as flood risk.

In the context of the criteria as set out in paragraph 1.1.5, land at Newstead, that has been the subject of extensive consultation with the Council and with the local community, would be a suitable area to accommodate the development needs of the present and those which will emerge in the future.

We also refer to the Vision set out in the Core Strategy, and reiterated in the SA DPD, to the effect that the objectives for the District should be delivered by:
• Creating the right balance of jobs, housing and infrastructure;
• Ensuring that development is sustainable in terms of location, use and form;
• Balancing the development needs of the District with the protection and enhancement of the natural and built environment;
• Addressing and mitigating any negative effects of development on the built and natural environment;
• Working with partners and residents to develop a place where people really matter.

Participate at Examination:
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>603952</td>
<td>Mr Colin Wigginton</td>
<td>Paragraph (1.2.1)</td>
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**Comment ID:** SASub73  
**Type:** Web  
**Attached Files:**

**Is DPD Legally Compliant:** No

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Effective

considerable local opposition was expressed from the Stamford Town Council, Stamford Chamber of Trade and Commerce, and numerous individuals to the Stamford Local Plan, however these were ignored, and many councillors were not allowed to voice opposition at the planning meeting. Furthermore, some councillors wanted a decision to be delayed because of the number of opposing letters, but this was overruled as the Council wanted the plan passed.

**Changes to make DPD sound:**

**Participate at Examination:** No
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>607531 Mr Niall Shannon</td>
<td></td>
<td>Paragraph (1.2.1)</td>
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**Comment ID:** SASub188  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** No

**Legal Compliance Reasons:**
Paragraph 1.2.1 of the DPD states that “Officers worked with Town and Parish Councils to gauge their views about the suggested sites and about development generally within the towns and villages.” The DPD is heavily reliant on the cabinet report that was published in the 1st August 2011 and in that report it states that Long Bennington Parish Council supports housing development on LSC1F. 4 members of the Parish Council attended a consultation meeting with SKDC on the 11th July 2011. They were misled into believing that they had to rank potential sites in Long Bennington and were told if they did not do this then SKDC would do it for them. Following a Parish Council meeting on the 7th November 2011, the whole council agreed unanimously to write to SKDC to clarify their total opposition to LSC1F being developed for housing and to reinforce the fact that in the village plan this site was identified as only suitable as a recreational space.

**Is DPD Sound:**
Unsound because DPD NOT:

**Changes to make DPD sound:**

**Participate at Examination:**
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<th>Consultee</th>
<th>Agent</th>
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<tr>
<td>490730 Mr Alan Hubbard</td>
<td>The National Trust</td>
<td>Paragraph (1.4.5)</td>
</tr>
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</table>

**Comment ID:** SASub218  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective

The list of "environmental documents includes the Landscape Sensitivity and Capacity Study but has not included one of the documents that it relies on and which also has relevance in its own right to the consideration of sites around Grantham (ie those not dealt with elsewhere as part of the Grantham Area Action Plan) - namely the Belton Setting Study jointly commissioned by the Council and the National Trust.

**Changes to make DPD sound:**
Add "Belton Setting Study (jointly commissioned with National Trust" to the list of documents at para 1.4.5.

**Participate at Examination:** No
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<th>Consultee</th>
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<tr>
<td>474396 Mr Gordon Smith</td>
<td></td>
<td>Paragraph (1.4.5)</td>
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**Comment ID:** SASub144  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**
**Legal Compliance Reasons:**
**Is DPD Sound:** No

**Unsound because DPD NOT:** Justified  
Amend to include District wide Green Infrastructure Study.

**Changes to make DPD sound:**
Amend to include District wide Green Infrastructure Study.

**Participate at Examination:**
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>372928 Mr Tom Gilbert-Wooldridge</td>
<td>English Heritage</td>
<td>Relationship with other LDF Documents (1.5)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub55  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**IS DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective; Consistent with National Policy

We note the intention for the Site Allocation and Policies DPD to dovetail with the Grantham Area Action Plan to ensure a consistent policy approach to new development and ensure there is no gap in area coverage. However, we are concerned that while the Area Action Plan includes a policy on the setting of the Grade I listed and registered Belton House and Park (Policy HE4), there is no equivalent policy in this DPD. As we have stated in relation to our response on the Area Action Plan, the setting of Belton House and Park goes beyond the boundary of the Area Action Plan (and beyond the extent defined in the Belton House and Park Setting Study). Therefore, to only require development proposals within the boundary of the Area Action Plan to consider the setting of Belton House/Park (and the Setting Study) could result in schemes further away from Grantham being put forward with inadequate assessments of the impacts on the designated heritage assets at Belton House/Park. This seems to be an inconsistent policy approach and a gap in area coverage, contrary to Paragraph 1.5.1. It renders this DPD unsound in terms of not being justified (founded on a robust and credible evidence base), effective (deliverable against historic environment issues) or consistent with national policy (PPS5 and the need to address the setting of designated heritage assets).

**Changes to make DPD sound:**

We therefore recommend that a policy is included within this DPD that reflects Policy HE4 in the Area Action Plan, bearing in mind that PPS5 defines setting as “the surroundings in which a heritage asset is experienced”, with the PPS5 Practice Guide going on to state that setting is not fixed and may change as the asset and its surroundings evolve (paragraphs 114 and 115). The following wording could be used:

“Belton House and its Historic Park and Garden are nationally and internationally significant heritage assets located in close proximity to the northern edge of the existing built up area of Grantham. Protecting and enhancing their setting, using the adopted Belton House and Park Setting Study for assistance, is important to maintaining their significance as heritage assets. Proposals considered to be within the setting of Belton House and Park will need to demonstrate what, if any, impact there will be on the setting of Belton House and Park through the preparation of a Heritage Impact Statement, and how through their location, scale, design, landscaping and materials take account of the setting of Belton and that any adverse impacts have been removed and/or mitigated.”

**Participate at Examination:** No
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<th>Agent</th>
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<tr>
<td>26277 Jenny Young</td>
<td>Heritage Trust for Lincolnshire</td>
<td>Paragraph (2.1.1)</td>
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**Comment ID:** SASub75  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

Is DPD Sound: No

Unsound because DPD NOT: Effective; Consistent with National Policy
Reference should be made to the historic environment rather than the built environment in line with PPSS

Changes to make DPD sound:
Replace built with historic

Participate at Examination: No
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<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>474396</td>
<td>Mr Gordon Smith</td>
<td>Objectives (2.2)</td>
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</table>

**Comment ID:** SASub145  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Justified

GI can be an alien concept to most, but is of great importance to plan making. Objective 11:

We suggest adding reference to the SKDC GI study (including some explanation of what GI is) that is for more helpful to helping the reader appreciate its value.

**Changes to make DPD sound:**

GI can be an alien concept to most, but is of great importance to plan making. Objective 11:

We suggest adding reference to the SKDC GI study (including some explanation of what GI is) that is for more helpful to helping the reader appreciate its value.

**Participate at Examination:**
Consultee: Mr D Bainbridge  
Agent: Bidwells  
Consultation Point: Objectives (2.2)

Comment ID: SASub117  
Type: E-Mail  
Attached Files:

IS DPD Legally Compliant: Yes  
Legal Compliance Reasons:

Is DPD Sound: No  
Unsound because DPD NOT: Effective

Objective 1 is to provide for at least 8,250 new homes across the District (excluding Grantham) up to 2026. I request clarification as to this amount because this does not appear to be consistent with Policy H1 of the Core Strategy. Policy H1 requires 13,620 dwellings across the District during the period 2006 to 2026, out of which 7,680 dwellings are to be at Grantham and so it can be calculated that the remainder for the District excluding Grantham must be 5,940 dwellings. It is understood that the SAP DPD comprises a plan period to 2026 and given the projected adoption in 2012, dwellings have been completed and consented since 2006. The concern in respect of the reference to 8,250 dwellings in Objective 1 is whether this is deliverable under Policy H1 of the Core Strategy and whether this objective is to be delivered by the SAP DPD? I calculate the amount of dwellings which have planning permission or else are to be allocated in the SAP DPD at Stamford, Bourne, The Deepings and the selected LSC to be 3,671. I calculate the amount of delivered housing at these settlements as stated in the SAP DPD to be some 2,155. Therefore, the SAP DPD appears to delivery 5,826 dwellings across the District (excluding Grantham) albeit ‘windfall’ sites are not included. This does not appear to deliver the Objective 1 provision of 8,250 dwellings. It is requested that the position is clarified prior to submission of the SAP DPD as this might prevent this being an issue at the examination hearings.

Changes to make DPD sound:
Clarification is requested about the status of Objective 1 where it states that at least 8,250 new homes are to be provided across the District (excluding Grantham) up to 2026.

Participate at Examination: Yes  
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>487941  Mr M Newton</td>
<td>Boyer Planning</td>
<td>Objectives (2.2)</td>
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**Comment ID:** SASub193  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified  
The statement in Objective 1: “Make provision for at least 8,250 new homes across the District (excluding Grantham) up to 2026” appears to have no basis in the Core Strategy.

13,600 homes are proposed in the Core Strategy. If the 7,680 proposed at Grantham (addressed in the Grantham Area Action Plan) are subtracted, the requirement for the rest of the District is 5,920 (not 8,250). It may be that the figure has some other basis, when taking account of completions and commitments, but this is not apparent.

**Changes to make DPD sound:**
Unless evidence suggests otherwise, change the figure in Objective 1 from 8,250 to 5,920 to ensure consistency with the Core Strategy.

**Participate at Examination:** Yes  
We consider it necessary that we participate in the oral part of the examination to consider and contribute to any issues arising from a revised or incorrect housing figure.
Consultee: 475706  Miss Clare Sterling
Lincolnshire Wildlife Trust

Consultation Point: Paragraph (2.2.1)

Comment ID: SASub87
Type: Web
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
Objective 8
The Lincolnshire Wildlife Trust strongly supports this objective that all allocated sites protect and enhance wildlife sites, protected species, biodiversity, water quality and open space.

Objective 11
The Lincolnshire Wildlife Trust strongly supports this objective relating to green infrastructure to ensure that the District has a network of multi-functional green space which increases biodiversity and enhances the quality of the natural environment.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 605795 Stamford Property Company Ltd
Agent: 396969 Mr Matthew Bagnall
DLP Planning Ltd

Consultation Point: Paragraph (2.2.1)

Comment ID: SASub95
Type: Web

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
Having regard to the context of our comment for paragraph 1.1.5, we support both Objective 1 and Objective 2. Consequently we also support Objective 8 and in particular where this references the protection of landscape character and of historic assets. In turn, we also support Objectives 9, 10 and 11, with particular concern for minimising impact during construction, reducing the risk of flooding – in this respect with special reference to the potential increase in downstream flood risk arising from new development – and the provision of greenspace, which we believe should be seen as an integral part of urban form.

Participate at Examination:
### Consultee
372928  Mr Tom Gilbert-Wooldridge  
English Heritage  

### Agent

### Consultation Point
Paragraph (2.2.1)

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IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: Yes

Unsound because DPD NOT:

Changes to make DPD sound:
We welcome reference to protecting and enhancing historic assets and archaeology as part of Objective 8 (although to ensure consistency with PPS5, “heritage assets” would be more appropriate), and we welcome reference to the historic environment as part of Objective 11 on green infrastructure.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 605165  Mr A Jennings
Agent: SASub181  Letter
Consultation Point: Stamford (3.1)

Comment ID: SASub181

Type: Letter
Attached Files: Pa33 of 309

IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound:
Unsound because DPD NOT:

Changes to make DPD sound:
Stamford is one of the most important historic towns in the country. Any development risks damage or destruction to the historic street pattern in the centre of the town. Any such road widening or alteration resulting from development would be disastrous for the long term prosperity of Stamford, which relies on a considerable tourist trade. The same principles apply to the other towns and particularly the Deepings and indeed to the service centre villages earmarked for development. All such further development also increases reliance on the motor car and thus energy consumption and carbon emissions.

Participate at Examination:
Consultee: Mrs Lisa Staunton

Consultation Point: Paragraph (3.1.1)

Comment ID: SASub49
Type: Web

IS DPD Legally Compliant: No

Legal Compliance Reasons:
Please provide figures for locally employed people

Is DPD Sound: No

Unsound because DPD NOT: Consistent with National Policy

The figures stated do not define locally employed people there is no employment in Stamford hence the amount of traffic using the local roads. A development of this size will add to over congested roads.

Changes to make DPD sound:

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>26277</td>
<td>Jenny Young</td>
<td>Paragraph (3.1.4)</td>
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<tr>
<td>Heritage Trust for Lincolnshire</td>
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**Comment ID:** SASub76  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:**  
Legal Compliance Reasons:

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective

Reference to archeological remains should be included. There are a number designated and undesignated archaeological remains which add to the story of Stamford

**Changes to make DPD sound:**  
Include reference to archaeological remains

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>605036 Mrs Lisa Staunton</td>
<td></td>
<td>Paragraph (3.1.5)</td>
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Comment ID: SASub45

Type: Web

Attached Files:

IS DPD Legally Compliant: No
Legal Compliance Reasons:
Contradictory,

Is DPD Sound: No

Unsound because DPD NOT: Consistent with National Policy

Stamford is noted for its architecture and unspoilt medieval and Georgian character, which has been used as the backdrop for many film and television productions. The town centre is protected by a Conservation Area (the first in England).

Developing land on the western approach into Stamford will encourage traffic to travel through Stamford to supermarkets, Doctors and Dentists as these are all sited to the East of the Town, Stamford is already choked with traffic and on the regular occasions that there is a mishap on the local trunk roads travel through the town becomes impossible.

Changes to make DPD sound:

Participate at Examination: No
### Consultee Comments

**Consultee:** 605036  Mrs Lisa Staunton

**Consultation Point:** Paragraph (3.1.8)

**Comment ID:** SASub46

**Type:** Web

**Attached Files:**

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**IS DPD Legally Compliant:** No

**Legal Compliance Reasons:**
With regard to Empingham Rd/Tinwell Road:- Government policy is to develope brown field sites before developing Green field sites.

**Is DPD Sound:** No

**Unsound because DPD NOT:** Consistent with National Policy

An increase in vehicle numbers (possibly 1500 vehicles, 2 per household average) would increase carbon emissions which in turn would damage important stonework to many listed buildings, when the occupants of these vehicles have no local facilities for grocery shopping etc.

**Changes to make DPD sound:**

**Participate at Examination:** No
Paragraph 3.1.9 notes that ‘together the completions and commitments for Stamford total approximately 660, leaving a shortfall of about 500 houses to be allocated’.

The proposed level of growth appears derived from the conclusions of the Core Strategy EiP to the effect that the (locally untested) target derived from the RSS would serve to consolidate the local role of Stamford by allowing past development rates to be broadly maintained. The Core Strategy Inspector expected this would be sufficient to meet need (Inspector’s Report paragraph 3.38).

However, it is also necessary to have regard to the national planning policy objectives that post date the adoption of the Core Strategy. Specifically the LDF will need to conform with the NPPF and the Draft NPPF is a material consideration.

The draft NPPF states at paragraph 109 that, specifically to boost the supply of housing, local planning authorities should, amongst other measures:
o use an evidence-base to ensure that their Local Plan meets the full requirements for market and affordable housing
o identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements and include at least a 20 per cent reserve to ensure choice and competition
o set out a housing implementation strategy describing how they will maintain delivery of a five-year supply of housing land, and
o set out their own approach to housing density to reflect local circumstances.

Paragraph 110 notes that the presumption in favour of sustainable development means that Local Plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits and that plan should deliver a wide choice of quality homes and widen opportunities for home ownership (paragraph 111).

Given that the Core Strategy demonstrably did not objectively assess development needs but merely carried forward the indicative minimum target contained in the RSS, and that the SA DPD does not attempt to consider what the actual need for development is, we object to the level of housing provision proposed to be allocated at Stamford. We consider that the Plan as published risks a) not being in conformity with national planning guidance and the clearly established objectives of the Government, and b) not being able to demonstrate and sustain a five year supply of housing land, including any reserve requirement that may be expected.
Changes to make DPD sound:
In the light of this, whilst we welcome the fact that the Plan does not seek to rigidly restrict its scope to the figure of 500 new homes at Stamford as described at paragraph 3.1.9, nevertheless we consider that the Council has fettered itself by not properly considering the actual housing need of the town and allocating sites accordingly.

Participate at Examination: Yes
See Above
### Consultee Comments: Site Allocation DPD: Submission October 2011

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<tr>
<td>26231 Mr D Bainbridge</td>
<td>Bidwells</td>
<td>Paragraph (3.1.9)</td>
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**Comment ID:** SASub115  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective

This paragraph states the remaining requirement for Stamford to be 760 houses.

Clarification is requested on the remaining requirement because 1,120 dwellings (Policy H1) minus 400 built dwellings leaves a balance of 740 dwellings and not 760.

The knock-on effect of this is that the 'shortfall' following deduction of 260 dwellings with planning permission, would be about 480 dwellings and not 500 as stated in paragraph 3.1.9.

It is requested that the position is clarified prior to submission of the SAP DPD as this might prevent this being an issue at the examination hearings. Without clarification the concern is that it will not be possible to readily manage and monitor delivery and supply at Stamford.

**Changes to make DPD sound:**

Clarification is requested regarding the remaining requirement for Stamford following deduction of built dwellings and the shortfall following deductions of built dwellings.

**Participate at Examination:** Yes

To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified

The following statement is made in para 3.1.12:
“To assess the potential capacity of the existing and future road network to accommodate future traffic and land-use changes, Lincolnshire County Council commissioned the development of a traffic model for Stamford. This model has been used to forecast the likely impact of a number of different scenarios for accommodating the town’s housing and employment needs. The recommendations of that report have been used to assess the best sites for allocation from a highway perspective.”

This is not justified at present as the text does not show how the conclusions of the report have been used to inform the selection of allocated sites.

The “Stamford Transport Forecasting Results Report” draws the following key conclusions that should inform the selection of allocated sites:
• The urban redevelopment and the urban expansions considered in the town of Stamford will result in significant expansion in housing and employment related development and general background traffic growth
• Several scenarios testing different alternatives for the location of the urban extension and the inclusion of urban redevelopment have been assessed
• The assessment of the scenarios indicates that Scenario 4b – which represents an urban extension (with no urban redevelopment) on the western side of Stamford, south of Empingham Road, shows the best results in terms of overall journey times and average travel speed in the Stamford network. This is likely due to its proximity to the A1 which means that traffic to/from Peterborough does not need to pass through the busier town centre network
• The assessment also indicates that for other potential sites a greater proportion of trips will use the more congested town centre network

These conclusions should be summarised within the text of the DPD to justify the selection of the sites listed in Policy STM 1

Changes to make DPD sound:
Change to paragraph 3.1.12 (penultimate sub para):
At the end of the last sentence after the word “perspective” add an additional sentence as follows: “and show that of the three major sites considered for allocation at Stamford, the development of the Empingham Road site would have the least impact”.

Participate at Examination: Yes

We consider it necessary that we participate in the oral part of the examination to demonstrate that:
• Changes are necessary to the wording of the DPD to ensure the evidence base is reported in a way that more clearly identifies the reasons for site selection
and;

- Show why the recommended wording would achieve that purpose (and therefore ensure the soundness of the DPD on this point).
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>605036  Mrs Lisa Staunton</td>
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<td>Paragraph (3.1.13)</td>
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**Comment ID:** SASub47  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** No  
**Legal Compliance Reasons:**  
A visibility splay of 120m in either direction, 4.5m back from the junc of the access road and Tinwell Road will be required.

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Consistent with National Policy

To achieve the required splay it will be necessary to remove hedgerows and established trees, which in turn will have a detrimental affect on the visual aspect of the town from the A1 and A43 and other local routes. The proposed additional junction will create a hazard for churchgoers at the Church of the Latter Day Saints, situated at the topmost of Tinwell Road, where access is directly from Tinwell Road.

**Changes to make DPD sound:**  
**Participate at Examination:** No
Consultee Comments

Consultee: Mr M Newton
Agent: Boyer Planning

Comment ID: SASub196
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Justified; Effective

Reasons why not Justified:
The following statement is made in paragraph 3.1.14 “Modelling of wastewater transition in the town reveals that there are constraints within the existing sewer network. Improvements will be required to the network to accommodate additional flows. This work will impact upon the phasing and delivery of large allocations.”

This statement is not justified because the nature of the constraints is not adequately identified, and the improvements required to accommodate additional flows are not specified (largely due to the Council’s Water Cycle Study being incomplete when the Submission DPD was prepared). The methodologies used in the Water Cycle Study to appraise the likely impacts cannot be relied upon to inform or justify delivery constraints and phasing requirements.

It is therefore not possible to conclude, at this time, that these issues will impact upon the phasing and delivery of large allocations.

Reasons why not effective
We consider that the statement in paragraph 3.1.14 about the modelling of wastewater transition (as quoted above) indicates that the infrastructure implications of the strategy have not been clearly identified at this time.

While the Water Cycle Study suggests that various infrastructure improvements will be necessary to deliver the growth areas both individually and collectively, this information does not appear to be consistent with appraisals completed by Anglian Water specifically for the major land allocation between Empingham Road and Tinwell Road (allocated under Policy STM1e)

Importantly, our evidence suggests that:
• Capacity exists within the sewerage infrastructure to accommodate the STM1e allocation with a choice of three potential points of foul water connection to adequately convey flows from the development to the treatment works. The site specific advice from Anglian Water does not appear to suggest any “significant infrastructure improvements” being required as suggested by the Water Cycle Study.
• Adequate headroom is available at Stamford Sewage Treatment works for the planned development

The infrastructure works necessary to deliver the allocation of land between Empingham and Tinwell Roads can be provided as part of the development proposals. There appears to be no evidence that specific requirements for phasing are necessary against the provision for housing and employment under Policies STM1e, STM2c and STM 3. As such, site specific advice from Anglian Water shows the land at this location may proceed without phasing constraint.
Changes to make DPD sound:
Delete the sentence “Modelling of wastewater transition in the town reveals that there are constraints within the existing sewer network. Improvements will be required to the network to accommodate additional flows. This work will impact upon the phasing and delivery of large allocations.”
This change will remove the reference to the impact of wastewater transition on phasing and delivery that we consider to be not justified.

Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to demonstrate that changes are necessary to the wording of the DPD on this issue, why the recommended wording is appropriate and to set out the evidence that supports the change.
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<tr>
<td>488174 Mr Paul Huyton</td>
<td></td>
<td>Paragraph (3.1.18)</td>
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**Comment ID:** SASub33  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

I endorse the development plan and particularly the preservation of rural areas on the fringe of the town. This is essential to maintain the unique character of the town. The current application to build a football stadium on land west of Ryhall road contravenes this policy and is detrimental to the environment of Stamford and the town’s archaeological and historical context.

**Participate at Examination:** No
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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26277</td>
<td>Jenny Young</td>
<td>Paragraph (3.1.18)</td>
</tr>
<tr>
<td>Heritage Trust for Lincolnshire</td>
<td></td>
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</tbody>
</table>

Comment ID: SASub77  
Type: Web  
Attached Files:

**IS DPD Legally Compliant:**

Legal Compliance Reasons:

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified  
An Historic Landscape Character Assessment has recently been completed for the county. Reference could be made throughout the document on this.

**Changes to make DPD sound:**

**Participate at Examination:** No
IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Justified

The following statement is made in para 3.1.19:
“To assess the landscape impact of large urban extension sites, a Landscape Sensitivity and Capacity Study (2011) has been prepared which considers the potential impact of development on the landscape around the town. The report looks at the sensitivity of the landscape to change and the capacity of it to accommodate development. The conclusions of this study have been used to inform the selection of allocated sites.”

This is not justified at present as the text does not show how the conclusions of the study have been used to inform the selection of allocated sites.
The Council’s Landscape Sensitivity and Capacity Study (January 2011), draws the following key conclusions that inform the selection of allocated sites:
The Study ranks the land between Empingham and Tinwell Roads (draft allocation STM1e) as second in the list of priority sites for development against landscape considerations (second only to a site of 4.37 hectares that is of insufficient size to meet housing or employment requirements and judged not suitable for housing development).
The STM1e site is judged to have “moderate” landscape sensitivity and “medium / high” landscape capacity (i.e. capacity for development). Against both measures, the STM1e site ranks higher as a priority for development than the two other large sites that were considered for allocation to meet the major part of the Stamford housing requirement.
The report concludes that the site is surrounded by urban influences including the A1, other principal routes into and out of the town, and residential development with indistinct urban character. It comprises of commonplace elements and combinations of features which creates generally unremarkable character and states that it is not significantly prominent either topographically or visually.
We have commissioned an independent “Stamford Urban Fringe Landscape Capacity Assessment” to ensure the Council’s policies are properly addressed. This assessment concludes that the land between Empingham and Tinwell Roads has “low to moderate” sensitivity and the lowest sensitivity score of all land on the town’s urban fringe.

Changes to make DPD sound:
At the end of the final sentence, insert: “
“These conclusions demonstrate that the site now proposed for allocation under Policy STM1e has “moderate” landscape sensitivity and “medium / high” landscape capacity (i.e. capacity for development). Against both measures, the STM1e site ranks higher as a priority for development than the two other large
sites that were considered for allocation to meet the major part of the Stamford housing requirement.
This change will better demonstrate the justification for the choice of the Empingham Road site against the alternatives.

**Participate at Examination:** Yes

We consider it necessary that we participate in the oral part of the examination to demonstrate that:

- Changes are necessary to the wording of the DPD to ensure the evidence base is reported in a way that more clearly identifies the reasons for site selection and;
- Show why the recommended wording would achieve that purpose (and therefore ensure the soundness of the DPD on this point).
## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
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<tr>
<td>605036  Mrs Lisa Staunton</td>
<td></td>
<td>Paragraph (3.1.20)</td>
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**Comment ID:** SASub50  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** No  
**Legal Compliance Reasons:**
- Proposed development of properties similar to those on Tinwell Road is the description by CEG.

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified  
- CEG have stated that properties will be in line with those on Tinwell Road, not affordable housing by any standard.

**Changes to make DPD sound:**

**Participate at Examination:**
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<th>Consultation Point</th>
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<tr>
<td>372928 Mr Tom Gilbert-Wooldridge</td>
<td>English Heritage</td>
<td>Allocations (3.1.1)</td>
</tr>
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</table>

**Comment ID:** SASub57  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We welcome the Council’s decision not to allocate Site ADD41 (Land off Priory Road, Stamford), which forms part of the scheduled monument of St Leonard’s Priory. The development of this site would harm the significance of the scheduled monument, both in terms of the scheduled area within the allocation but also in terms of the significance and setting of the remaining scheduled monument, which includes the Grade I listed upstanding remains of the Priory. A housing development on this site would result in the loss of the open space between the upstanding remains of the Priory and diminish the significance and appreciation of the overall scheduled monument. There are more suitable sites in Stamford to deliver the numbers of houses suggested (up to 40), and the public benefits of developing this site would not be outweighed by the harm caused to designated heritage assets. We are happy to provide further advice on this site at the Examination if necessary.

We also welcome the Council’s decision not to allocate Sites STAM14, 15, 16 and 17, which would form an urban extension to the east of Stamford. As stated in our response to the Site Allocations consultation in 2009, we have significant concerns regarding impacts on the setting of key historic assets, including the Grade I listed Burghley House, the Grade II* registered Burghley Park and Stamford Town Centre Conservation Area as well as the impact on the wider surrounding landscape. We note the Council’s Landscape Sensitivity and Capacity Study (2011) identifies most of this area as being of high landscape sensitivity and low landscape capacity. We are also concerned regarding the cumulative impact of this development, which could lead onto further development (particularly in the form of a south-eastern bypass of Stamford) that causes further damage to the historic environment.

**Participate at Examination:** Yes

If Site ADD41 is to be discussed at the examination, we would welcome the opportunity to participate in discussions given the scheduled monument issues.
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<th>Consultation Point</th>
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<tr>
<td>603952 Mr Colin Wigginton</td>
<td></td>
<td>Paragraph (3.1.1.1)</td>
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**Comment ID:** SASub74  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

The development of one of the other sites that are available, rather than the Empingham Road/Tinwell Road proposal, would result in less cross town traffic and pollution, and the possibility of the start of a much needed and delayed East/West bypass.

**Changes to make DPD sound:**

**Participate at Examination:**
Consultee | Agent | Consultation Point
---|---|---
26231 Mr D Bainbridge | Bidwells | Paragraph (3.1.2.1)

**Comment ID:** SASub116  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective

This paragraph states that at least 750 new homes will be provided at Stamford. Clarification is requested on the remaining requirement at Stamford because following deductions of 400 built dwellings (paragraph 3.1.9) the remaining balance is 740 dwellings.

It is requested that the position is clarified prior to submission of the SAP DPD as this might prevent this being an issue at the examination hearings. Without clarification the concern is that it will not be possible to readily manage and monitor delivery and supply at Stamford.

**Changes to make DPD sound:**

Clarification is requested regarding the remaining requirement for Stamford following deduction of built dwellings and the shortfall following deductions of built dwellings.

**Participate at Examination:** Yes  
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
26245   Mr Jeremy Dawson
Strutt and Parker

Consultation Point
Policy STM1: Housing Allocations in Stamford

Comment ID: SASub157
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons: 

Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective

We consider DPD to be unsound because it is not "justified" or "effective" in it's current form.

Within paragraph 3.1.2.1 "Development in Stamford" confirmation is given that provision is made in the plan for the development of at least 750 new homes in Stamford. Policy STM1 identifies 5 sites to accommodate this growth, the large proportion of which will be accommodated by a single urban extension STM1e.

Whilst we support these allocations, we do not support the deletion of ADD41 (land off Priory Road) as identified in paragraph 6.12 of the Development Portfolio Holder's report no.PLA899 dated 1st August 2011. We suggest the decision to delete this proposed allocation within the list of suitable sites allocated for housing development in Stamford on the basis of informal verbal comments from English Heritage is not justified.

Feasibility of development of this site has been considered in close consultation with English Heritage formerly under the guidance of Dr Glynn Coppack in his former role as head of Monastic Architecture at English Heritage until March 2010.

Geophysical surveys and trial trenching of ADD41 have revealed no significant buried archeology, as referred to in Dr Glynn Coppack's Request for Revision of the Designated Area dated October 2011. On this basis, in October 2011 an application was made to English Heritage to deschedule this area as an ancient monument in consultation with South Kesteven District Council and Heritage Lincolnshire.

The central tenent of Dr Coppack's support for the principle of development is to facilitate and enhance the under utilised historic and cultural asset of St Leonard's Priory, by improving its setting and public access to it through the delivery of sensitive and high quality development of site ADD41, a position aligned to objectives 11 and 12 of the core strategy.

Deletion of this proposed allocation jeopardizes the delivery of circa 40 houses (including affordable housing provision) which were provisionally identified as being deliverable in this allocation and furthermore the opportunity to improve the public access and setting to St Leonard's Priory, and the effective delivery of objectives 11 and 12 of the core strategy.

Changes to make DPD sound:
The inclusion within the Site Allocation and Policies DPD of site ADD41 within STM1: Housing Allocations in Stamford.

Participate at Examination: Yes

We consider it necessary to participate in the oral examination to demonstrate deletion of this proposed allocation is not sound.
# Site Allocation DPD: Submission October 2011 - Consultee Comments

**Consultee**  
597902 Mr Harjinder Kumar  
Peterborough City Council

**Agent**  
597895 Mr Harjinder Kumar  
Peterborough City Council

**Consultation Point**  
Policy STM1: Housing Allocations in Stamford

<table>
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<th><strong>Comment ID:</strong> SASub19</th>
<th><strong>Type:</strong> Web</th>
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**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We find the policy to phase the housing allocations in Stamford (in accordance with paragraphs 3.5.1 to 3.5.5) is a sound approach. In the past, we had expressed concerns about the level of housing development in market towns around Peterborough and on the A15 corridor. Our view was that this resulted in increased commuting to Peterborough for jobs and services. Phasing of development will ensure that investment in infrastructure will be in place to accommodate development and may prevent developers from ‘cherry picking’ sites in Stamford at the expense of those in Peterborough, within the same housing market area. We support this phasing approach.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee 487941 Mr M Newton
Boyer Planning

Consultation Point Policy STM1: Housing Allocations in Stamford

Comment ID: SASub227
Type: E-Mail  Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT: Justified

We are concerned that there is no clear justification for the allocation of specific sites to particular five-year phases in this policy, based on site characteristics or timescales for delivery.
The provision for phasing within this section is not informed by a robust and credible evidence base. This is contrary to a key question raised in the Inspectorate’s soundness guidance in relation to the test of justification: i.e. “Is the content of the DPD justified by the evidence? What is the source of the evidence? How up to date is it and how convincing is it?”
The supporting text for Policy STM1, at paragraph 3.1.2.2 states that “the phasing of sites has been influenced by evidence relating to infrastructure constraints, particularly wastewater infrastructure, which will require improvement to accommodate new housing”.
Whilst the Water Cycle Study suggests that various infrastructure improvements will be necessary to deliver the growth areas both individually and collectively, this information does not appear to be consistent with appraisals completed by Anglian Water specifically for the major land allocation between Empingham Road and Tinwell Road (allocated under Policy STM1e).
Importantly, our evidence suggests that:
• Capacity exists within the sewerage infrastructure to accommodate the STM1e allocation with a choice of three potential points of foul water connection to adequately convey flows from the development to the treatment works. The site specific advice from Anglian Water does not appear to suggest any “significant infrastructure improvements” being required as suggested by the Water Cycle Study.
• Adequate headroom is available at Stamford Sewage Treatment works for the planned development.
The infrastructure works necessary to deliver the allocation of land between Empingham and Tinwell Roads can be provided as part of the development proposals. There appears to be no evidence that specific requirements for phasing are necessary against the provision for housing and employment under Policies STM1e, STM2c and STM 3. As such, site specific advice from Anglian Water shows the land at this location may proceed without phasing constraint.
Other than waste water transmission issues, the policy and its supporting text do not provide any clear rationale, in terms of site characteristics, to allocate specific sites to different phases.

Changes to make DPD sound:
We consider that the phasing provisions within the final column of the table in Policy STM1 should be deleted. This change will remove wording in the policy that
we consider is not justified.

**Participate at Examination:** Yes

We consider it necessary that we participate in the oral part of the examination to demonstrate that the phasing set out in the policy is not justified or effective, which impacts upon the soundness of the DPD.
IS DPD Legally Compliant:  No
Legal Compliance Reasons:
We consider that the Site Allocations and Policies DPD is not legally compliant because South Kesteven District Council has failed to fulfill its duty to properly demonstrate that it has worked jointly with Rutland County Council as required by PPS12. We also consider that significant weight should be afforded to new legislation contained in the Localism Act. Please refer to attached.

Is DPD Sound:  No
Unsound because DPD NOT:  Justified; Consistent with National Policy
It is considered that the DPD is unsound because South Kesteven District Council's approach to site allocations is unjustified and is not the most appropriate because it is not consistent with the evidence. Paragraph 3.1.2.1 and Policies STM1 and STM2 should acknowledge site RUT01 as a suitable site for a mixed use extension to Stamford. Paragraph 3.1.2.1 should refer to the ability of the site to assist South Kesteven District Council in achieving its development requirements because site RUT01 performs at least as well as the sites selected for inclusion in the DPD at Policy STM1 and STM2 on the basis of the evidence provided with this representation. Please refer to attached.

Changes to make DPD sound:
The site provides an opportunity to meet housing and employment needs for Stamford and Rutland County Council. The Site Allocations and Policies DPD should be amended to reflect the ability of site RUT01 to meet those requirements. As site RUT01 is immediately deliverable, recognition should be given to its ability to provide housing and employment development within the LDF timescale. The Site Allocations and Policies DPD, in recognition of these objectives, should provide for a policy or recognition within paragraph 3.1.2.1 that provides for a Joint Area Action Plan to be prepared between the two councils in order to meet these objectives. The policy or amended wording to paragraph 3.1.2.1 should read:

Land at Quarry Farm, Stamford is considered as a sustainable location for mixed use development. It will be subject to a Joint Area Action Plan developed jointly with Rutland County Council. The development of this site should provide approximately 400 new homes, up to 7.5 hectares of employment land, and associated open space.

Participate at Examination:  Yes
It is considered that our representations raise important procedural and soundness issues particularly in reference to the "duty to cooperate" which would benefit from further debate and submissions orally, particularly in light of the Localism Act and emerging National Planning Policy Framework.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 372928 Mr Tom Gilbert-Wooldridge  
Agent: English Heritage  
Consultation Point: Policy STM1: Housing Allocations in Stamford

Comment ID: SASub58  
Type: Web  
Attached Files:

IS DPD Legally Compliant: Yes  
Legal Compliance Reasons:

Is DPD Sound: No  
Unsound because DPD NOT: Effective

We have no objection to the principle of allocating any of the sites referred to in Policy STM1, but there are historic environment issues with a number of them. Sites STM1a (Land adjacent to Kettering Road) and STM1d (Stamford AFC, Kettering Road) form part of the approach to the historic core of Stamford and its conservation area along the A43 and will need to be carefully designed to avoid negative impacts. Site STM1e (Land between Empingham Road and Tinwell Road) also has the potential to impact on the setting of Tinwell Conservation Area to the south-west across the A1 and the overall landscape setting of Stamford (depending on the topography, intervisibility and the design of any development). However, while there is recognition of the landscape issues relating to Site STM1e in Policy STM3, there are no development criteria for the other housing sites in Stamford. The absence of such criteria renders the DPD unsound in terms of being effective and deliverable against historic environment and other issues.

Changes to make DPD sound:
We therefore recommend that other housing site allocations for Stamford have development criteria in Policy STM1, with Sites STM1a and STM1d referring to the need to preserve and enhance the setting of Stamford and its conservation area.

Participate at Examination: No
IS DPD Legally Compliant: No
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT:

Our concern with the above proposal for the land adjacent to Kettering Road centres on 2 aspects:
Firstly, the effect on traffic. With the current proposal to redevelop the Football stadium and build dwellings the combined effect on traffic will be to increase congestion especially during periods of going to and from work. Traffic already backs up for periods during the day and with no sight of a bypass being built this will only add to the problems. Perhaps the redevelopment of the football could go ahead to see the effect this has before considering the opposite fields.
Secondly, loss of green space and footpaths. The fields provide a welcome break between Stamford, Wothorpe and the A1. The loss of this together with the footpaths through these fields will be just another encroachment on our green areas.

Changes to make DPD sound:

Participate at Examination:
IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: Yes

Unsound because DPD NOT:

Changes to make DPD sound:

Participate at Examination: Yes

We act on behalf of the owners of the site and strongly support the allocation of this site for residential development in the Site Allocations and Policies DPD Submission October 2011. The site is located in a sustainable location, adjoining the existing built up area of Stamford and is extremely suitable for development with regards to sustainable development objectives.

Its location adjoining Stamford denotes that accessibility to existing services and facilities is very good. Stamford Junior School is located a short distance west from the site along Kettering Road and Kettering Road runs eastwards to join High Street St Martin’s which then links northwards into the heart of the town, approximately 750m from the site where a number of services and facilities are readily available. The site is well connected via public transport with Stamford railway station approximately 250m north-west of the site which is accessed via Wothorpe Road, and Stamford bus station approximately 650m north-west. A number of bus services are also readily available on Kettering Road.

Two footpaths (public rights of way) cross the site, one from the north corner to the south corner, and one from the same starting point but in more south-westerly direction across the site. Suitable provision could be made for these when considering the development of the site in more detail.

In physical terms the site is well contained by topography, existing landscaping and built development to the east. Stamford Football Club lies directly north and is at present subject to a pending planning application proposing the “Demolition of existing club buildings and structures, residential development with associated infrastructure, including new means of access with Kettering Road”. This signifies that Stamford is directing future growth towards the west of the town, and therefore if the site was developed it would not encroach into open countryside. In addition, the development of the Stamford Football Club proposes new means of access onto Kettering Road, indicating the possibility of comprehensive access proposals.

We are in agreement with the figure of 30 dwellings that has been put forward in the Site Allocations Submission DPD subject to detailed masterplanning. The development would be designed so as to incorporate open space and green infrastructure and deliver a mix of housing providing 35% affordable. The land is considered to deliverable in accordance with PPS3 as it is available, suitable, and achievable. Furthermore, we strongly support the allocation of this site and believe it would be extremely suitable for development in the short term within the next few years.
**Consultee**
549250  Mr John Burton

**Consultation Point**
STM1a

**Comment ID:** SASub21  **Type:** Letter  **Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

A. Overlooking/loss of privacy.
B. Traffic impact.
C. Loss of open countryside, including mature trees, and footpaths through the open countryside.

A. Our house, Mayfield, is built on the south west side of Pinfold Lane with the rear garden backing onto the field in question. We have open views from the property over the fields to Wothorpe which obviously will be lost if this development takes place. At the moment we are not aware of the type of development that will appear if the planning goes ahead. But anything other than bungalows will have a major effect on the outlook and thus the value of our property.

B. In addition to this site, the action plan asks to consider the site of the current football ground. Here there is the possibility of a major development of up to 100 new dwellings. Coupled with this, the land adjunct to Kettering Road could add a further 30 dwellings. The present usage of the Kettering Road is heavy, with long queues trailing back to the boundary of Stamford, whilst trying to turn into St Martins High Street. This traffic includes tractor/trailer commercial vehicles travelling either into Barnack Road or Wharf Road and onwards east. Local traffic often tries to beat the queue by cutting through Wothorpe Road and Station Road to enter the road again at the traffic lights at the George Hotel. The above planned increases in traffic, with no sign of an east/west bypass, could well bring everything to a standstill. Surely with the football ground currently being subject to a planning application, it would be sensible to delay a decision on the land opposite until one can study the effect of a major residential development in this area.

C. Thirdly, but just as importantly, there is to consider the loss of an area which is the closest to Stamford, where residents can walk through open countryside up and around Wothorpe and Wothorpe Castle. We assume that the two public footpaths would still exist but then be set through the developed area. This is an area where there is plenty of evidence of wild life and at least three very mature and old variety apple trees as well as many other mature trees.

Finally, acceptance of this proposal would doubtless give rise to further plans submitted from the owners of adjoining fields which would be difficult to refuse with a precedent set. This would destroy an important facility for the many who enjoy walking on the footpaths through these fields and eradicate a pleasant green margin to the attractive town.

We also consider the erection of high density modern housing on a green field site within metres of the historic houses on the High Street of St Martins to be completely out of character.

At the very least, we would respectively suggest that, if approved, the football ground site is redeveloped first to judge the effect of large developments on the Kettering Road.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Changes to make DPD sound:
Participate at Examination: No
Consultee | Agent | Consultation Point
---|---|---
Mr William Strain | Mr Raymond F Kilsby | STM1a

Comment ID: SASub176
Type: Letter

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Justified; Effective

The settlement pattern in this locality proposed by the Plan is unsound, because it neither follows nor proposes boundaries which are of a long term nature, robust, credible and defensible.

Extending the adjacent residential allocation to the west, as sought by these representations, will both establish coherent and logical boundaries to the residential development hereabouts, as well as doing so in a manner which will not cause prejudice or compromise to any other land in this vicinity.

There is no planning consideration identified in the District Council's evaluation and assessment of that adjacent residential allocation which comprises any form of material objection to the western extension of that allocation as proposed by these representations.

The "tightness" of the residential land supply is such - particularly in the short term - that the additional housing provision which would result if our Clients' case succeeds (some 25 dwellings) is, we contend, not only both required and fully justified, but should also be welcomed.

This addition to the residential land supply is capable of being achieved without detriment to any other relevant planning objective.

In all the circumstances we believe and contend that in the interests of rendering this Deposit Plan both sound and effective, there are cogent reasons, and every justification for amendments of the Plan as our Clients seek.

[see attachment for full statement]

Changes to make DPD sound:

Our Client's case is that

1 Residential allocation STM1a should be enlarged by its extension to the west to include the land edged rd on the OS extract comprising Appendix A forming part of the accompanying planning statement.

2 Within Plan Policy STM1a the "indicative number of houses" and "affordable housing target" figures should be adjusted to become 55 and 18 respectively.

Participate at Examination: Yes

1 To substantiate our Client's case
2 To up-date the housing supply figures should this be necessary
3 To complete and up-date the findings of the archaeological investigations and evaluation
# Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>605511  Mrs Linda Cross</td>
<td>396969 Mr Matthew Bagnall</td>
<td>STM1b</td>
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**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**  
N/A  
**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>294235 Mr Mark Mann</td>
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Consultation Point: STM1c

Comment ID: SASub220
Type: Letter
Attached Files: SASub220-224.pdf

IS DPD Legally Compliant:
Legal Compliance Reasons:
Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
We support the proposed allocations of site STAM09, which is allocated with the adjacent site STAM10 for a mixed use development comprising 50 dwellings and 2ha of employment land. [see attached letter for full details of representation]
We suggest that the figure 50 homes should be for guidance only and that a design led approach should determine the actual number of homes that can be accommodated on this site.

Participate at Examination:

---

We support the proposed allocations of site STAM09, which is allocated with the adjacent site STAM10 for a mixed use development comprising 50 dwellings and 2ha of employment land. [see attached letter for full details of representation]
We suggest that the figure 50 homes should be for guidance only and that a design led approach should determine the actual number of homes that can be accommodated on this site.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>407064  Mr Philip Williams</td>
<td>Ryhall Road Residents Association</td>
<td>STM1d</td>
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**Comment ID:** SASub32  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:**  
Legal Compliance Reasons:

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Consistent with National Policy

Ryhall Road Residents Association wish to formally object to the development of ADD42 1a and STAM05 1d (Kettering Road Sites) also site S11/2283 (Barnack Road). We agree with the comments made regarding traffic congestion in relation to Kettering road sites, as stated in your ‘Summary of Assessments’ ‘poor access into High Street and to Stamford town centre’. Development of these sites would not lessen car journeys as Burghley Estates have stated it would increase car journeys and increase cross town traffic. The town bridge is already gridlocked from time to time, traffic from these sites would I believe use the A43/A1/B1081 to access the town. We feel these developments should be ruled out because of traffic access concerns that no amount of road layout changes would alleviate. We also oppose development of these sites in regard of PPS7 as if development of these sites is allowed it would put pressure on councillors/planners to allow development of site ADD43 (Ryhall Road). In short we feel applications STAM05 1a and S11/2283 Barnack Rd are predatory planning applications because of the linkage with Site ADD43 Ryhall Rd.

**Changes to make DPD sound:**

**Participate at Examination:** Yes  
if the inspector wishes i'm quite happy to come along
IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Unsound because DPD NOT: Justified; Effective
We object to Policies STM1e, STM2c and STM3 on the grounds that the allocation of land in the area between Tinwell Road and Empingham Road does not represent the optimum opportunity to secure the Vision and Objectives that are stated to underpin the Plan.
We have considered a comparison between Site STM1e and land at Newstead as previously considered by SKDC and draw out the following points which clearly demonstrate that Newstead is sequentially preferable to site STM1e (and consequently to allocations STM2c and STM3).
- In the SHLAA, STM1e is said to have the capacity to deliver 861 dwellings, with Newstead currently being promoted for the delivery of 1002 dwellings. Site STM1e is therefore not a significantly better ‘fit’ with the intended scale of allocation. A ‘fit’ has been achieved for site STM1e by partly allocating the overall site for employment, with consequent, visual, amenity and traffic impacts on the wider urban form as well as on the proposed residential allocation.
- Newstead is better located in relation to realistic employment opportunities as it adjoins existing employment land allocations and the existing employment and retail area off Ryhall Road.
- The proposed allocation of employment land (policy STM2c) does not assure that employment will be created or available in this location and will give rise to acknowledged highway issues in relation to A1 junctions and to possible visual and landscape issues affecting the overall setting of the important historic town.
- The allocation of a significant part of the overall area for employment uses in Policy STM2c compromises the ability of site STM1e to deliver the social and community infrastructure in the longer term, in the absence of any expectation of potential to increase the size of the allocation – a development of 400 dwellings is unlikely to support the commercial viability of any ‘local centre’ where there is no overall potential for growth beyond the quantum of development allocated in this Plan.
- The scope for development at Newstead within the plan period and enabling continued growth to meet post plan needs will support the viability of the social and community developments needed to support a growing population.
- Site STM1e is comparatively less well located in relation to established town centre provisions as summarised in the table below:
(Table emailed to SKDC separately)
- A Landscape Assessment (previously submitted to SKDC) concluded that the provision of a robust landscape scheme for Newstead would result in an attractive setting to the development and the eastern approaches of Stamford with scope to provide panoramic views from the site towards the town centre and church spires and provide for a viewing corridor from the site towards Burghley House and Park.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Due to the topography and enclosed nature of site STM1e, there is little opportunity for any development to provide panoramic views and view corridors towards the local historic landscape. The neighbouring uses of the site means there is much less opportunity to deliver a scheme which would present a varied settlement edge without significantly reducing the area available for development. The size of the site also restricts the amount of woodland belt and hedgerow planting, meaning little or no scope to integrate development into the wider landscape. We also note that within the Council’s SHLAA, site STM1e was judged to have a potential negative impact on the character of the area – and should therefore be considered not to meet the stated Vision and Objectives of the Plan in this respect.

Newstead offers scope for integration of development into the character of the Kesteven Uplands by retaining existing woodland belts and hedgerow planting and establishing a varied settlement edge.

Site STM1e has limited scope to appear as anything other than an extension of the built form along the valley side towards and up to the A1 with limited scope for landscaping or the creation of a long term attractive edge to an important historic town.

The proposed development of Newstead would be reliant in significant new highway infrastructure comprising a new A16/A6121 Link Road with scope to provide future connections to a relief road network but enabling the creation of a clear hierarchy of street types and public spaces and promoting accessibility for the whole community in accord with the principles of good placemaking.

In contrast, site STM1e offers limited options in terms of access locations due to the nature of neighbouring uses. Access to the site is currently gained from Empingham Road and Tinwell Road, these being the only viable locations for access in any new development and the Plan provides no indication of how any potential conflict between employment and residential traffic would be managed. Access could be gained through Launde Gardens, though it is likely this would see roads in the neighbouring residential area becoming congested and used as ‘rat-runs’, making them less safe and the area generally less amenable.

Both Tinwell Road and Empingham Road provide access to the A1, which runs along the western boundary of the site. Although convenient for access to the national road network, a large development on this site with two access roads in close proximity to junctions with the A1 is likely to lead an increase in congestion, particularly having regard to the significantly sub standard sliproads.

Overall, Newstead scores highly on accessibility when compared to site STM1e and it should be clear that there are a number of key destinations within 2km of the site, meaning most amenities are within walking distance. Add to the fact that Newstead is of a scale that could deliver a Neighbourhood Centre, primary schooling and other local facilities, whereas in contrast Site STM1e is of limited capacity with no overall scope for further longer term expansion, and is therefore likely to be a burden on existing services and facilities. Given that site STM1e is unlikely realistically to offer scope to supplement provision and to meet the needs which it generates for itself, it is clear that Newstead demonstrates convincing sequential advantages over the proposed allocated site and thereby would better achieve the Vision and Objectives that properly underpin the Plan.

Changes to make DPD sound:

Accordingly we suggest that Policies STM1e, STM2c and STM3 be deleted and an appropriate alternative allocation of land at Newstead be made, of sufficient scale to accommodate the assessed needs of the town with scope for further and continued growth in the longer term to ensure the delivery of appropriate social and community objectives.

Participate at Examination: Yes

See Above
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee  487941  Mr M Newton
Boyer Planning

Agent

Consultation Point  STM1e (and STM3)

Comment ID: SASub228
Type: E-Mail  Attached Files: SASub228.pdf

IS DPD Legally Compliant:  Yes
Legal Compliance Reasons:

Is DPD Sound:  No

Unsound because DPD NOT:  Justified
We consider that the choice of land between Empingham Road and Tinwell Road as the major allocation to meet Stamford’s housing needs (Policy STM1e), is fundamentally sound and justified by the Council’s evidence base. However, the reasons for the selection of this site are not yet adequately demonstrated within the supporting text. There is at present only a partial explanation and justification for the choice of housing allocations in Policy STM1 within the submission document.

The text under section 3.1.1 “Allocations” – “Site Selection” is not sufficient for this purpose. We suggest that a succinct statement of the principal points of justification be included against the site selection criteria set out in para 5.1.5 of the Core Strategy under a new heading “Major Site Allocation”, as set out below.

Changes to make DPD sound:
We consider that additional supporting text is necessary to demonstrate that the allocation of site STM1e is justified and therefore “sound”. We propose the following text under a new heading “Major Site Allocation” drawn from the Council’s evidence base and information provided by the developer. This could, if necessary, form an appendix to the DPD. [see attachment]

These changes will better demonstrate the justification for the allocation of the site in relation to Core Strategy site selection criteria and in relation to possible alternatives.

Participate at Examination:  Yes
We consider it necessary that we participate in the oral part of the examination to demonstrate that additions are necessary to the wording of the DPD to draw upon and summarise the evidence base that led to the choice of site allocations in Policy STM1 (and therefore render the policy sound against the test of “justification”).

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### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tr>
<td>605036 Mrs Lisa Staunton</td>
<td></td>
<td>STM1e (and STM3)</td>
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</tbody>
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**Comment ID:** SASub51  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** No  
**Legal Compliance Reasons:** not in line with government policy  

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Consistent with National Policy  
Green field site when there are a number of brown field sites available, CEG are ignoring the recommendation for a landscaped corridor separating the new development from existing properties, when asked at the consultation they stated that the rear gardens of the new properties would butt up against existing properties, not a landscaped corridor by anyone's standards.  

**Changes to make DPD sound:**

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 26208 Mr Bruce Thompson
Diploma PLC

Agent: 262283 Mr Andy Butcher
Bidwells

Consultation Point: Policy STM2: Employment Allocations in Stamford

Comment ID: SASub200
Type: E-Mail
Attached Files: SASub199 and 200.pdf; Appendix 1.pdf; Appendix 2.pdf; Appendix 3.pdf; Appendix 5.pdf; Appendix 6.pdf; Appendix 7.1.pdf; Appendix 7.2.pdf; Appendix 4.pdf

IS DPD Legally Compliant: No

Legal Compliance Reasons:
We consider that the Site Allocations and Policies DPD is not legally compliant because South Kesteven District Council has failed to fulfill its duty to properly demonstrate that it has worked jointly with Rutland County Council as required by PPS12. We also consider that significant weight should be afforded to new legislation contained in the Localism Act. Please refer to attached.

Is DPD Sound: No

Unsound because DPD NOT: Justified; Consistent with National Policy

It is considered that the DPD is unsound because South Kesteven District Council's approach to site allocations is unjustified and is not the most appropriate because it is not consistent with the evidence. Paragraph 3.1.2.1 and Policies STM1 and STM2 should acknowledge site RUT01 as a suitable site for a mixed use extension to Stamford. Paragraph 3.1.2.1 should refer to the ability of the site to assist South Kesteven District Council in achieving its development requirements because site RUT01 performs at least as well as the sites selected for inclusion in the DPD at Policy STM1 and STM2 on the basis of the evidence provided with this representation. Please refer to attached.

Changes to make DPD sound:
The site provides an opportunity to meet housing and employment needs for Stamford and Rutland County Council. The Site Allocations and Policies DPD should be amended to reflect the ability of site RUT01 to meet those requirements. As site RUT01 is immediately deliverable, recognition should be given to its ability to provide housing and employment development within the LDF timescale. The Site Allocations and Policies DPD, in recognition of these objectives, should provide for a policy or recognition within paragraph 3.1.2.1 that provides for a Joint Area Action Plan to be prepared between the two councils in order to meet these objectives. The policy or amended wording to paragraph 3.1.2.1 should read:

Land at Quarry Farm, Stamford is considered as a sustainable location for mixed use development. It will be subject to a Joint Area Action Plan developed jointly with Rutland County Council. The development of this site should provide approximately 400 new homes, up to 7.5 hectares of employment land, and associated open space.

Participate at Examination: Yes

It is considered that our representations raise important procedural and soundness issues particularly in reference to the "duty to cooperate" which would benefit from further debate and submissions orally, particularly in light of the Localism Act and emerging National Planning Policy Framework.
### Consultee Comments

**Consultee**
372928  Mr Tom Gilbert-Wooldridge

**Agent**
English Heritage

**Consultation Point**
Policy STM2: Employment Allocations in Stamford

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**Comment ID:** SASub59  
**Type:** Web  
**Attached Files:**

**Is DPD Legally Compliant:** Yes

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Effective

We have no objection to the principle of allocating any of the sites referred to in Policy STM2, but there are historic environment issues with STM2a (Land north of Barnack Road) and STM2c (Land adjacent to the A1 off Empingham Road). The former adjoins the Grade II* registered park and garden of Burghley House to the south and has the scheduled area of St Leonard’s Priory to the north, while the latter has the potential to impact on the setting of Tinwell Conservation Area to the south-west across the A1 and the overall landscape setting of Stamford (depending on the topography, intervisibility and the design of any development). While there is recognition of the landscape issues relating to Site STM2c in Policy STM3, there are no development criteria for the other employment sites in Stamford. The absence of such criteria renders the DPD unsound in terms of being effective and deliverable against historic environment and other issues.

**Changes to make DPD sound:**

We therefore recommend that other employment site allocations for Stamford have development criteria in Policy STM2, with Site STM2a referring to the need to preserve and enhance the significance and setting of nearby designated heritage assets.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 294235  Mr Mark Mann
Agent: Savills
Consultation Point: STM2b

Comment ID: SASub221
Type: Letter
Attached Files: SASub220-224.pdf

Is DPD Legally Compliant:
Legal Compliance Reasons:
Is DPD Sound: Yes
Unsound because DPD NOT:
Changes to make DPD sound:
We support the proposed allocations of site STAM09, which is allocated with the adjacent site STAM10 for a mixed use development comprising 50 dwellings and 2ha of employment land.
[see attached letter for full details of representation]We suggest that the figure 50 homes should be for guidance only and that a design led approach should determine the actual number of homes that can be accommodated on this site.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
487941  Mr M Newton
Boyer Planning

Consultation Point
STM2c (and STM3)

Comment ID: SASub229
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Effective

We consider that Policy STM2 is not effective at present because:
• it is not consistent with Policy STM3
• it does not define employment uses sufficiently broadly to meet Objective 3 of the SAP DPD and Policy E1 of the Core Strategy.
Policy STM2c allocates a precise area of 14 ha and defines that allocation as “High Quality Business Park incorporating B1 and B2 uses”. Policy STM3 (second paragraph) states “The development of this site should provide ...........up to 14 ha of land for a range of different employment uses including a 10 ha high quality and designed business park”
We consider that Policy STM2 should refer to “up to 14 ha” in column 3 of the table to bring it into line with STM3 and that column 4 should then refer to “A range of different employment uses including a high quality and well-designed business park of up to 10ha”. This is more compatible with the wording in Policy STM3 and, by the use of the words “up to”, applies the same principle of flexibility to the business park proposal as to the overall quantum of up to 14 ha. The use of wording in Policy STM2 that is more in accordance with that in Policy STM3 will ensure the DPD is internally consistent.
The above change in wording will also ensure the policy is sufficiently flexible to meet Objective 3 which is to “Identify a range of suitable and available sites to support a diversity of new and existing employers (including commercial, retail, leisure and other business sectors) to promote a thriving local economy.” We consider Policy STM2 should be consistent with the requirement of Objective 3 to provide a range and diversity of employment generating activity and not confined to B1 and B2 uses.
The above change will also ensure consistency with Core Strategy para 6.1.6 which states:
“The allocation of employment land in Policy E1 encompasses all types of employment generating development, other than retail which is the focus of Policy E2. The policy, therefore, covers development within the B Use Classes as well as public and community uses and other town centre uses including: leisure, entertainment and intensive sport and recreation facilities, arts, cultural and tourism development which provide employment opportunities.”

Changes to make DPD sound:
In the third column of the table in Policy STM2 replace "14ha" with "up to 14ha".
In the fourth column of the table in Policy STM2 replace "High Quality Business Park incorporating B1 and B2 uses" with "A range of different employment uses including a high quality and well-designed business park of up to 10ha".

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These changes will introduce greater flexibility into the DPD on this issue and ensure it is sound against the "effective" test.

**Participate at Examination:** Yes

We consider it necessary that we participate in the oral part of the examination to demonstrate that changes are necessary to the wording of the DPD to ensure the Policy is internally consistent with Policy STM3 and defines employment uses in way that is effective in the sense of consistent with Objective 3 of the DPD and Policy E1 of the Core Strategy.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 605795 Stamford Property Company Ltd
Agent: 396969 Mr Matthew Bagnall
D L P Planning Ltd
Consultation Point: STM2c (and STM3)

Comment ID: SASub98
Type: Web
Attached Files: SASub97 and 98.pdf

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective

We object to Policies STM1e, STM2c and STM3 on the grounds that the allocation of land in the area between Tinwell Road and Empingham Road does not represent the optimum opportunity to secure the Vision and Objectives that are stated to underpin the Plan.

We have considered a comparison between Site STM1e and land at Newstead as previously considered by SKDC and draw out the following points which clearly demonstrate that Newstead is sequentially preferable to site STM1e (and consequently to allocations STM2c and STM3).

o In the SHLAA, STM1e is said to have the capacity to deliver 861 dwellings, with Newstead currently being promoted for the delivery of 1002 dwellings. Site STM1e is therefore not a significantly better ‘fit’ with the intended scale of allocation. A ‘fit’ has been achieved for site STM1e by partly allocating the overall site for employment, with consequent, visual, amenity and traffic impacts on the wider urban form as well as on the proposed residential allocation.

o Newstead is better located in relation to realistic employment opportunities as it adjoins existing employment land allocations and the existing employment and retail area off Ryhall Road.

o The proposed allocation of employment land (policy STM2c) does not assure that employment will be created or available in this location and will give rise to acknowledged highway issues in relation to A1 junctions and to possible visual and landscape issues affecting the overall setting of the important historic town.

o The allocation of a significant part of the overall area for employment uses in Policy STM2c compromises the ability of site STM1e to deliver the social and community infrastructure in the longer term, in the absence of any expectation of potential to increase the size of the allocation – a development of 400 dwellings is unlikely to support the commercial viability of any ‘local centre’ where there is no overall potential for growth beyond the quantum of development allocated in this Plan.

o The scope for development at Newstead within the plan period and enabling continued growth to meet post plan needs will support the viability of the social and community developments needed to support a growing population.

o Site STM1e is comparatively less well located in relation to established town centre provisions as summarised in the table below:
(Email sent to SKDC separately)

o A Landscape Assessment (previously submitted to SKDC) concluded that the provision of a robust landscape scheme for Newstead would result in an attractive setting to the development and the eastern approaches of Stamford with scope to provide panoramic views from the site towards the town centre and church spires and provide for a viewing corridor from the site towards Burghley House and Park.
Due to the topography and enclosed nature of site STM1e, there is little opportunity for any development to provide panoramic views and view corridors towards the local historic landscape. The neighbouring uses of the site means there is much less opportunity to deliver a scheme which would present a varied settlement edge without significantly reducing the area available for development. The size of the site also restricts the amount of woodland belt and hedgerow planting, meaning little or no scope to integrate development into the wider landscape. We also note that within the Council’s SHLAA, site STM1e was judged to have a potential negative impact on the character of the area – and should therefore be considered not to meet the stated Vision and Objectives of the Plan in this respect.

Newstead offers scope for integration of development into the character of the Kesteven Uplands by retaining existing woodland belts and hedgerow planting and establishing a varied settlement edge.

Site STM1e has limited scope to appear as anything other than an extension of the built form along the valley side towards and up to the A1 with limited scope for landscaping or the creation of a long term attractive edge to an important historic town.

The proposed development of Newstead would be reliant in significant new highway infrastructure comprising a new A16/A6121 Link Road with scope to provide future connections to a relief road network but enabling the creation of a clear hierarchy of street types and public spaces and promoting accessibility for the whole community in accord with the principles of good placemaking.

In contrast, site STM1e offers limited options in terms of access locations due to the nature of neighbouring uses. Access to the site is currently gained from Empingham Road and Tinwell Road, these being the only viable locations for access in any new development and the Plan provides no indication of how any potential conflict between employment and residential traffic would be managed. Access could be gained through Launde Gardens, though it is likely this would see roads in the neighbouring residential area becoming congested and used as ‘rat-runs’, making them less safe and the area generally less amenable.

Both Tinwell Road and Empingham Road provide access to the A1, which runs along the western boundary of the site. Although convenient for access to the national road network, a large development on this site with two access roads in close proximity to junctions with the A1 is likely to lead an increase in congestion, particularly having regard to the significantly sub standard sliproads.

Overall, Newstead scores highly on accessibility when compared to site STM1e and it should be clear that there are a number of key destinations within 2km of the site, meaning most amenities are within walking distance. Add to the fact that Newstead is of a scale that could deliver a Neighbourhood Centre, primary schooling and other local facilities, whereas in contrast Site STM1e is of limited capacity with no overall scope for further longer term expansion, and is therefore likely to be a burden on existing services and facilities. Given that site STM1e is unlikely realistically to offer scope to supplement provision and to meet the needs which it generates for itself, it is clear that Newstead demonstrates convincing sequential advantages over the proposed allocated site and thereby would better achieve the Vision and Objectives that properly underpin the Plan.

Changes to make DPD sound:
Accordingly we suggest that Policies STM1e, STM2c and STM3 be deleted and an appropriate alternative allocation of land at Newstead be made, of sufficient scale to accommodate the assessed needs of the town with scope for further and continued growth in the longer term to ensure the deliver of appropriate social and community objectives.

Participate at Examination: Yes
See Above
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
<th>Agent</th>
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<tr>
<td>417569</td>
<td>Mr Malcolm Brandwood</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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<tr>
<th>Comment ID: SASub164</th>
<th>Attached Files: SASub164.pdf</th>
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**Type:** Letter

**IS DPD Legally Compliant:** No

**Legal Compliance Reasons:**
I feel the granting of outline planning is unsound as it is not based on sound town planning ie road system amenities, schools, industry at wrong end of town.

**Is DPD Sound:** No

**Unsound because DPD NOT:** Effective

I believe that this proposed development is based on financial gain by the developers, Cecil Trust, Burghley, this council, land agents, all of these come before the needs of Stamford. Putting 400 dwellings at the wrong end of town is wrong and will aggravate the already overloaded town traffic system.

**Changes to make DPD sound:**
The ring road proposed in my other letter and development each side of the road.

**Participate at Examination:** Yes

Only to express a view on the way this unsound development and the corrupt way it has been thrust on the town.
Consultee: Mr M Newton
Agent: Boyer Planning

**Consultation Point:** Policy STM 3: Mixed Use Urban Extension site in Stamford

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**Comment ID:** SASub241
**Type:** E-Mail

**IS DPD Legally Compliant:** Yes

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Justified

The wording requires that the proposed development, “Ensures that the highest standards of sustainable design and construction are provided in all buildings”. The wording of this policy could suggest that all new buildings on the site should be constructed to the highest possible standard i.e. Code for Sustainable Homes Level 6 for all residential properties and BREEAM ‘outstanding’ level for commercial premises. If that were the intention, we consider that it would not be realistic or viable in the context of the overall infrastructure requirements of the development. If that is not the intention, the reference to the “highest standards” will require a subjective interpretation which indicates the policy principle is not sufficiently precise, justified or capable of implementation.

**Changes to make DPD sound:**

Replacement of bullet point 10 with the following is suggested:-
“Ensures that the development incorporates sustainable design and construction principles within the proposed buildings on the site to reduce the energy demand of the development”.

An expansion of the wording of the text in the policy in the form of supporting text would enable a clearer and more precise planning requirement. It is suggested that an additional paragraph is included within the supporting text to reinforce and clarify the key principles set out within the policy. Our suggested wording for this paragraph is:-
“The development should seek to maximise energy efficiency within its layout and design to achieve Code for Sustainable Homes level 3 for residential properties and a BREEAM rating ‘Very good’ for commercial buildings, unless it can be demonstrated that this is not financially viable”.

This change would result in a policy requirement that is clearer, less subject to different interpretations and more justifiable.

**Participate at Examination:** Yes

We consider it necessary that we participate in the oral part of the examination to demonstrate that the proposed policy as submitted is not sound as the requirement for sustainability measure is imprecise and potentially unviable and as such, cannot be justified.
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>497285 Mr Owen Walters</td>
<td>Highways Agency</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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**IS DPD Legally Compliant:**
**Legal Compliance Reasons:**

**Is DPD Sound:** No
**Unsound because DPD NOT:**

The Agency considers that development on the west side of Stamford has the greatest potential to impact on the A1, for example through commuting trips to the Peterborough area. The Agency considers that it would have been beneficial if the transport evidence base included an assessment of potential highway impacts, including on the A1 junctions.

**Changes to make DPD sound:**

The Agency welcomes the reference to the need for detailed Transport assessments (TA’s) to support development. This section could be further strengthened by referring to the need for a comprehensive range of sustainable travel measures, including Travel Plans, to encourage non-car based modes. This would then be in accordance with Spatial Policy 3 of the adopted Core Strategy which states that travel plans, transport statements and transport assessments will be required for development proposals.

**Participate at Examination:**
Consultee: Mr C Kilner

Is DPD Legally Compliant: Yes
Legal Compliance Reasons: 

Is DPD Sound: No

Unsound because DPD NOT:
I consider the site between Tinwell Road and Empingham Road to be unsuitable and I believe it should not be preferred over the other two locations for the following reasons:

1. The 1995 Local Plan identifies the land between Tinwell Road and Empingham Road as a "prominent area for Special Protection". This reflects the high environmental quality of the land. The Casterton Road land and the land between Ryhall Road and Uffington Road is not covered by these designations. If the land was considered in 1995 to be worthy of protection because of its environmental quality then that assessment must still hold true today.

2. The site plays an important role in defining the setting of the town. The setting of the town when viewed from the south-east at Easton on the Hill is a view of exceptional quality and one which should be protected from harmful development. The proposed allocation would irreparably damage these views and the setting of the town.

3. The majority of major retail outlets in Stamford, e.g. Sainsbury's and Morrisons, are located on the eastern side of the town and so a major development of 400 dwellings to the west, on the land between Tinwell Road and Empingham Road, will cause traffic chaos through the centre of Stamford as this is the only major route from one side to the other.

Stamford is neglected with respect to traffic control, and parking within the town is a free-for-all. It would not be unreasonable to estimate that 400 homes would bring another 1000 vehicles and this additional volume through Stamford town centre does not bear consideration.

The historic town of Stamford is under threat of permanent damage and I hope that the comments and objections from Stamford people are taken very seriously. This is a turning point in Stamford's history and the person making the wrong decision will become infamous for its irreparable damage.

Changes to make DPD sound:

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: Natural England

Agent: Natural England

Consultation Point: Policy STM 3: Mixed Use Urban Extension site in Stamford

Comment ID: SASub206
Type: E-Mail
Attached Files:

IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT:
It is NE’s opinion that the urban extensions need to demonstrate exemplary standards of design and development. These developments will shape the future of South Kesteven. This recommendation applies to the urban extensions in particular, as economies of scale mean they should be able to deliver higher standards of sustainability.

Exemplary development could include:
• GI – High quality local networks connected into the wider networks, plus a financial contribution to the strategic GI required to maintain/enhance overall sustainability;
• Energy efficiency – achievement of zero carbon in advance of the nationally set timetable;
• Renewable energy – Higher levels of renewable energy generated on-site, potentially through community-scale generation;
• Design – Where surrounding development standards are low, the design of new developments should set a new standard.

There may be the potential to ‘wrap up’ this recommendation through an overarching sustainable development policy. We would support this approach if it is deemed appropriate.

Changes to make DPD sound:
There may be the potential to ‘wrap up’ this recommendation through an overarching sustainable development policy. We would support this approach if it is deemed appropriate.

Participate at Examination:
Comment ID: SASub240
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified
This policy principle refers to “Provision of necessary infrastructure improvements required to support the development, including improvements to the wastewater transmission network”. In order to be considered sound, the DPD must be founded upon a robust and credible evidence base which includes the requirement that the choices made in the plan are backed up by facts. In this case, the requirement to make improvements to the wastewater network does not fulfil this requirement and is not considered justified. At the current time, the capacity and requirements of the water cycle have not been identified. Furthermore, evidence collected on behalf of the site promoters suggests that capacity exists within the sewerage infrastructure to accommodate the STM3 allocation with a choice of three potential points of foul water connection to adequately convey flows from the development to the treatment works. Indeed, the site specific advice from Anglian Water provides no suggestion of any “significant infrastructure improvements” being required as suggested by the Water Cycle Study. Furthermore, adequate headroom is available at Stamford Sewage Treatment works for the planned development.

Changes to make DPD sound:
Deletion of bullet point 9.
This would remove a provision within the policy that we consider is not justified

Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to present evidence relating to the infrastructure capacity and to demonstrate that the development can be accommodated within the existing network, which impacts upon the justification and soundness of this part of the DPD.
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<td>487941 Mr M Newton Boyer Planning</td>
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**Comment ID:** SASub233  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective

We consider that the allocation of the site between Empingham Road and Tinwell Road for a mixed use urban extension in Policy STM3 is fundamentally sound and justified by the Council’s evidence base. However, this is not adequately demonstrated as there is no supporting text to provide a statement of justification for the mixed-use approach at Stamford or the suitability of this particular site for mixed use development.

We consider that the explanatory text should explain, justify and support Policy STM 3 by setting out:

- why a mixed use development is the best approach to meeting the town’s housing and employment needs
- why the site allocated under Policy STM3 is the most suitable and appropriate choice for mixed use development

We have suggested some additional explanatory text to fulfil this purpose and to better demonstrate the justification for the allocation that stems from the Council’s evidence base.

**Reasons Why Not Effective**

The Inspectorate’s soundness guidance raises key questions in relation to the requirement that DPDs are effective in terms of flexibility. Two of these questions are:

- **“Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?”**
- **“Is the DPD sufficiently flexible to deal with any changes to, for example, housing figures from an emerging RSS?”**

We consider that the employment land requirement for the site should include an element of flexibility to ensure first, that a range of employment generating uses can be considered (in line with Policy E1 of the Core Strategy) and second; that the quantum required is sufficiently flexible to respond to the requirements of the site masterplan (in terms of good design) and the requirements of the market.

Policy STM3 achieves this by referring to a requirement of “up to” 14 ha and we consider that the same principle of flexibility should apply to the specific provision for a business park (i.e. the provision should be for a business park of “up to” 10 ha).

**Changes to make DPD sound:**

We consider that additional supporting text is necessary to demonstrate that the policy is justified and effective (and therefore sound in these terms). We would suggest the following text to achieve this purpose:

- Additional text in new section entitled “Major Mixed-use Allocation”
“The Core Strategy makes clear that Stamford’s employment land requirement encompasses all types of employment generating development, other than retail, including public and community uses, leisure, entertainment, and recreation facilities, as well as office and industrial premises. A mixed-use development that combines these various uses with housing is considered to be an effective response to the housing and employment requirements for Stamford set out in Policies H1 and E1 of the Core Strategy. It is considered that, in the context of Stamford, Core Strategy Objectives 1, 2 and 5 are best achieved by developments that mix housing and employment on the same site. These objectives include the principles of

- facilitating a pattern of development that meets the diverse economic, social and cultural needs of the whole community (Objective 1)
- promoting a more sustainable pattern of development (Objective 2)
- achieving a better balance of development in the southern part of the District in part by expanding the economic base of Stamford, Bourne and the Deepings to provide the opportunity for people to live and work within a thriving, locally significant employment and service centre (Objective 5).

The site between Empingham and Tinwell Roads is well suited to the requirements for housing and employment land and meets the selection criteria for these land uses as set out in paragraphs 5.1.5 and 6.1.8 of the Core Strategy.

The Core Strategy criteria for selection of employment and housing land include six criteria common to both land uses. There are three criteria that relate more specifically to requirements for employment uses. These are:

- Suitability of the site to meet the needs of different employment uses
- Attractiveness of the site to the market
- Location of site in relation to the strategic road network and the ability to maximise the use of public transport, cycling and pedestrian links to access it.

The South Kesteven Employment Land Capacity Study (Final report March 2010) demonstrates that the site performs best of all the available options in relation to these criteria primarily by virtue of its immediate access to the strategic road network and the fact that it does not require commercial traffic to gain access via Stamford’s historic town centre (therefore avoiding adverse impacts on the environment and the impact of congestion on business efficiency).

It has already been demonstrated that the site meets the site selection criteria for housing [as set out in our recommended additional supporting text for Policy STM1e]. It is therefore considered that the land between Empingham Road and Tinwell Road provides the best match to the combined housing and employment criteria set out in the Core Strategy. The site offers the most suitable and appropriate location for a development that combines these uses, together with the community facilities and employment opportunities provided by a small local centre.”

Change to wording of Policy STM3:

We propose that the second paragraph of the policy be revised as set out below:

“The development of this site should provide approximately 400 new homes and up to 14 ha of land for a range of different employment uses including a high quality and well-designed business park of up to 10 ha (as allocated in STM2 above).”

**Participate at Examination:** Yes

We consider it necessary that we participate in the oral part of the examination to demonstrate that additions are necessary to the wording of the DPD to draw upon and summarise the evidence base that explains and justifies the mixed use allocation in Policy STM3 (and therefore render the policy sound against the test of “justification”).
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<td>487941</td>
<td>Boyer Planning</td>
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**Comment ID:** SASub238  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective

The policy requires that the proposed development, “Secures the provision of good pedestrian and cycle access from and within the site to the local centre, primary and secondary schools, new employment opportunities and the town centre”.

Whilst the general principle relating to the provision of good links for pedestrians and cyclists is considered to be sound, there is a lack of clarity, and consequently effectiveness, of the wording within the policy which undermines the soundness of the principle. The issue relates to the extent of the works required to be undertaken by the developer to achieve the Council’s objectives. An amended form of wording is suggested below to ensure that the works required are limited to on-site and adjoining the site as opposed to the provision or funding of projects not directly related to the proposed development.

**Changes to make DPD sound:**

Replacement of bullet point 7 with the following is suggested:-

“Secures the provision of good pedestrian and cycle access from and within the site to the local centre, and facilitates links with primary and secondary schools, new employment opportunities and the town centre”.

This change would render the policy more effective and justified in relation to the needs and requirements that are likely to arise from the development.

**Participate at Examination:** Yes  
We consider it necessary that we participate in the oral part of the examination to ensure that the wording of the policy is concise and ensures that it is effective.
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<td>407029 Mr Robert Conboy</td>
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**Comment ID:** SASub44  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

I am instructed by the members of our Group to register strong objections on planning grounds against the allocation of development noted above. If this development is allowed to go forward it offends and conflicts with several core objectives and strategies, including protection and the character of the district and the setting of Stamford, protection of the green belt sites as accepted by Stamford Town Council, particularly when brown field sites are available to the east of Stamford.

**Changes to make DPD sound:**

**Participate at Examination:** Yes

We have over 200 members in the Protection Group from throughout Stamford and we intend to continue our objections through to a Public Enquiry.
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**Consultation ID:** SASub237  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We support key principle 6 as being legally compliant and sound. The principle seeks to ensure that appropriate education and health facilities are available and, if not, addresses any deficiencies through the provision of an appropriate financial contribution.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

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**Comment ID:** SASub234  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective

This policy principle requires that the proposed development “Incorporates appropriately planned green infrastructure and landscaping within the design and layout of development to both reduce the impact of development on the landscape and to provide a landscaped corridor between the new development and the existing residential area on Lonsdale Road. Green infrastructure should incorporate public open space, play and recreation facilities and other community open space as considered appropriate”.

Whilst the general principle relating to provision of green infrastructure and landscaping within the layout of the development is sound, the policy is overly prescriptive in terms of the layout and does not allow adequate flexibility. Reference to the provision of a landscaped corridor between the new development and the existing properties on Lonsdale Gardens is restrictive in terms of the design and does not allow sufficient flexibility to consider alternative means to achieve the purpose of protecting the amenity of adjoining properties. The requirement of the development to provide open space and green infrastructure is covered by Policy SAP10 and the protection of the amenities of existing residents could be ensured through development management policies. The policy should provide a focus on the purpose as opposed to prescribing how it is achieved.

**Changes to make DPD sound:**

It is suggested the reference to a ‘landscaped corridor’ is deleted from the policy. Replacement of bullet point 3 with the following is suggested:- “Incorporates appropriately planned green infrastructure and landscaping within the design and layout of development to both reduce the impact of development on the landscape and protect the amenity of properties in the adjoining existing residential area on Lonsdale Road. Green infrastructure should incorporate public open space, play and recreation facilities and other community open space as considered appropriate”.

This change will remove a requirement of the policy that is unduly prescriptive and which is not sufficiently flexible (and therefore effective) and which would render the DPD unsound if retained.

**Participate at Examination:** Yes

We consider it necessary that we participate in the oral part of the examination to discuss how the prescriptive nature of the policy does not allow sufficient flexibility within the development of the site. The provision of green infrastructure within the development is a justifiable policy requirement although further discussion is required to ensure that it is delivered in the most effective and environmentally beneficial way in order to fully meet with Objective 11 of the SAP DPD.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 294235  Mr Mark Mann
Agent: Savills

Consultation Point: Policy STM 3: Mixed Use Urban Extension site in Stamford

Comment ID: SASub222
Type: Letter
Attached Files: SASub220-224.pdf

IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified; Consistent with National Policy

The Council would appear to base their proposed site allocations primarily on the need to not exacerbate the existing highway problems and have used the report by Jacobs to identify the most appropriate location for the proposed urban extensions where most of the proposed development would go.

The conclusion of the report suggests, quite emphatically, that the assessment of the various scenarios for growth indicated that the sites STAM01 and 02 showed the best results in terms of overall journey times and average travel speed in the Stamford network. This was for scenario 4b, which did not include the urban redevelopment sites.

[see attached letter for full representation]

Changes to make DPD sound:
The impact on landscape and the impact on the highway network were significant factors in the Council's approach to identifying an appropriate site for development in Stamford. However, it would appear the Council's own evidence base indicates that the difference between the sites is marginal. Therefore other factors should be taken into account when identifying the appropriateness of development sites.

Participate at Examination: Yes
### IS DPD Legally Compliant:
No

**Legal Compliance Reasons:**
The policy requires that the proposed development “Incorporates an appropriate mix of residential tenure and type that respects the surrounding context, including at least 140 affordable homes”.

Section 19(2) of the Planning & Compulsory Purchase Act 2004 sets out the criteria against which the legal compliance of DPDs will be assessed. This includes national policies and guidance set out by the Secretary of State, Regional Spatial Strategies and other documents adopted by the local planning authority. A key question set by the Planning Inspectorate’s soundness guidance is “If the DPD is not a Core Strategy, is it in conformity with the Core Strategy?”

Policy H3 of the South Kesteven Core Strategy, adopted in July 2010, relates to the provision of affordable housing and states, “Where affordable housing is to be provided on site, a target of up to 35% of the total capacity of a scheme should be affordable” (our emphasis).

Given that the policy is worded such that it requires “at least” 140 affordable homes on the site, it is not consistent with Core Strategy policy for a target of “up to” 35%. As such, it is not considered that the DPD in its current form is legally compliant as required by the 2004 Act.

### Is DPD Sound:
No

**Unsound because DPD NOT: Effective; Consistent with National Policy**

Reasons why not effective:
The requirement for “at least” 140 affordable homes is not consistent with paragraph 3.1.20 of the DPD. This considers issues of viability and deliverability, as well as the level of need, and requires “up to” 35% of new housing to be affordable on sites of five or more units to be affordable.

This inconsistency with paragraph 3.1.20 fails the key test raised by the Planning Inspectorate Soundness Guidance: “Are the policies internally consistent?”

Reasons why not consistent with National Policy

Paragraph 39 of the draft National Planning Policy Framework (NPPF) published by the Secretary of State in July 2011 sets out, “To enable a plan to be deliverable, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”.

The policy in its current form is not consistent with this policy because the requirement for “at least” 140 affordable homes does not allow viability considerations to be taken into account.

**Changes to make DPD sound:**
It is suggested that bullet point 5 is replaced with the following:
“Incorporates an appropriate provision of affordable housing in line with adopted policy, with a target of up to 35% of new homes to be affordable”, subject to
viability considerations. This change would introduce greater flexibility according to viability considerations and ensure compliance with Core Strategy policy.

**Participate at Examination:** Yes
We consider it necessary that we participate in the oral part of the examination to provide evidence on the quantum and type of affordable housing to be provided.
### Consultee Comments

**Consultee**
487941  Mr M Newton
Boyer Planning

**Consultation Point**
Policy STM 3: Mixed Use Urban Extension site in Stamford

**Comment ID:** SASub230  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified

No justification is provided for the requirement to provide a new access road from Empingham Road through the site to Tinwell Road. The purpose of the link road has not been identified and its design is not appropriately controlled by policy. The policy does not take into consideration possible negative impacts that would result from a direct access between the two roads.

The provision of an access through the site, as set out in the policy, can be broken down into particular categories:

- Private vehicular access
- Public transport access
- Pedestrian access
- Cycle access

The proposed policy does not adequately distinguish between the above types of access which in turn impacts upon the precision of the policy. A policy requirement for an access through the site for public transport, pedestrians and cyclists is considered to be appropriate and in conformity with Policy SP3 of the adopted Core Strategy on ‘Sustainable Integrated Transport’. However it is not clear why a through route for all vehicles is necessary and how it would assist in the achievement of DPD objectives.

The Stamford Traffic Model “Evaluation of Urban Extensions Sites” report did not model or identify the need for a continuous North-South link through the site. Indeed the report concluded that the STM3 site performed the best without a north-south link. Given that there are existing “all movement” junctions on the A1 with both Empingham Road and Tinwell Road, there is no existing local demand for a local north south link in this area of Stamford as the A1 effectively provides this function and operates well within its operational capacity.

Furthermore, it would not be good practice to encourage through traffic through a residential area when there is already adequate infrastructure performing this role.

The Planning Inspectorate published its Soundness Guidance: Examining Development Plan Documents in August 2009. In response to its question, “Is the content of the DPD justified by the evidence? What is the source of the evidence?” the initial question cannot be answered favourably given the lack of justification contained within the policy or supporting text.
Changes to make DPD sound:
The inclusion of supporting text would enable a clearer and more precise planning requirement. Planning policies specific to Stamford (STM1, 2 and 3) are supported by very little in terms of accompanying text and it is suggested that wording be included to reinforce and clarify the key principles set out within the policy.

Our suggested wording for this paragraph is:-
“The provision of a vehicular access through the site linking Empingham Road and Tinwell Road for buses, pedestrians, cyclists and emergency services vehicles will ensure that the development contributes towards the Council’s objectives in terms of sustainable transport. Any through route access for private vehicles will be designed such that it discourages “rat-running” through the development”.

This change will remove a requirement that we consider not justified and express the issue in a way that the evidence base could support.

Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to illustrate how the wording of this key principle within the policy is not justified by the evidence base and to explain alterations necessary to result in a sound DPD.
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<td>482965 Mr Chris Briance</td>
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Comment ID: SASub165  
Type: E-Mail  
Attached Files:

IS DPD Legally Compliant:  
Legal Compliance Reasons:   
Is DPD Sound: No  
Unsound because DPD NOT:   

It is a development in the wrong place.
a. 400 houses will generate about 600 cars. 300 of these will need to get to the other side of Stamford daily. All the dentists, secondary schools, doctors, the hospital and the major supermarkets and out of town retail park require passing through Scotgate junction. It is difficult enough to cross now. There will be total gridlock daily if this many cars attempt to use the junction. You only have to see the mayhem when there are any roadworks in Stamford. There will also be problems with the A1 with so many extra cars at rush hours.
b. Since 1970 an enormous amount of development has taken place on this side of town. The extension of Lonsdale Road, the building of Arran Road and all the roads from it, the large development with all the names of flowers and trees as road names are some of them.
2. Stamford needs a ring road/relief road round it before any more development takes place anywhere and at least doubling the amount of parking spaces in Stamford.
a. Luckily Stamford's Chamber of Trade and Commerce has a solution. If the Chamber's plans are read by the Policy Committee then you will see how this can be of enormous benefit to the town.
3. I am told that the population is increasing and that it needs feeding. If this is true, can anyone justify building on a field that is extremely fertile, has been well managed for many years and every year produces a successful harvest. This year there were two - cereal and potatoes. In between crops it has also been used for country events like ploughing competitions, horse based events and other agricultural pursuits.
4. Finally I challenge the need for any new houses at all. There are few major employers left in Stamford so apart from those who will commute to other towns to work there will be little custom for them. A look in the local paper each week shows more than 400 properties of all prices for sale, more than enough to satisfy anyone who wants to buy here.

After saying all this I have the feeling that the council is just paying lip service to the legal requirements for consultation and the fate of the field in question has already been decided. If this is not so, why are there daily digging of sample holes, surveying and little white marker poles sticking up all over the place?

Changes to make DPD sound:
Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 487941  Mr M Newton
Boyer Planning

Consultation Point: Policy STM 3: Mixed Use Urban Extension site in Stamford

Comment ID: SASub231
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective; Consistent with National Policy

The 2nd paragraph of the policy states “The development of this site should provide approximately 400 new homes completed in phases across the 10 year period 2016 to 2026 and up to 14 ha of land for a range of different employment uses including a 10 ha high quality and designed business park (as allocated in STM2 above).”

Reasons why it is not justified:
It is not considered that the phasing of the development within the policy is justified as it is unnecessarily restrictive in terms of the delivery of the development and not informed by a robust and credible evidence base.

The Planning Inspectorate’s Soundness Guidance (August 2009) requires consideration of the following:-
“Is the content of the DPD justified by the evidence? What is the source of the evidence? How up to date is it and how convincing is it?”

Paragraph 3.1.2.2 states that the phasing of sites has been influenced by evidence relating to infrastructure constraints, particularly wastewater infrastructure. However, the findings of the Water Cycle Study that forms part of the evidence base do not appear to be consistent with a pre-development report prepared by Anglian Water on behalf of the promoters of the site. This report demonstrates that capacity exists within the sewerage infrastructure to accommodate the STM3 development, with a choice of three potential points of foul water connection to adequately convey flows from the development to the treatment works. Indeed, the site specific advice from Anglian Water does not suggest “significant infrastructure improvements” being required as suggested by the Water Cycle Study. Adequate headroom is available at Stamford Sewage Treatment works for the development.

Further, no justification for the 2016-2026 timeframe has been provided within Policy STM3 or its supporting text, and it has not been demonstrated that the definition of this phase (or the allocation of the site within it) is founded upon a robust and credible evidence base.

Reasons why it is not effective
The policy is not “effective” as it does not allow a sufficient degree of flexibility. The lack of flexibility within the proposed phasing undermines the soundness of the DPD. The Planning Inspectorate’s Soundness Guidance (August 2009) sets a key question in relation to flexibility: “Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?” The answer to this is ‘no’ as there is no mechanism within the policy to bring forward the development of the site in the event that circumstances, such as housing land supply, require it.

Reasons why it is not consistent with National Policy
Site Allocation DPD: Submission October 2011 - Consultee Comments

Paragraph 10 of PPS3 sets out a number of outcomes the planning system should seek to deliver. One of these is: “A flexible, responsive supply of land — managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate”.
Furthermore, paragraph 52 goes on to say: “The Government’s objective is to ensure that the planning system delivers a flexible, responsive supply of land. Reflecting the principles of ‘Plan, Monitor, Manage’, Local Planning Authorities and Regional Planning Bodies should develop policies and implementation strategies to ensure that sufficient, suitable land is available to achieve their housing and previously-developed land delivery objectives”.
This is further reinforced by paragraph 14 of the draft National Planning Policy Framework (NPPF) which requires local authorities: “to prepare Local Plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes”.
The phasing provisions of the policy could work against these principles, particularly as there is no mechanism within the policy to bring forward development where a shortfall in land supply requires this.

Changes to make DPD sound:
We consider the following changes are necessary to make the DPD sound:
Given the site is available, deliverable and free of any significant constraints, it is considered that the reference to the phasing should be omitted from the policy. The following paragraph is suggested as a replacement to the 2nd paragraph of the policy:-
“The development of this site should provide approximately 400 new homes and up to 14 ha of land for a range of different employment uses including a 10 ha high quality and designed business park (as allocated in STM2 above)”. This change will remove the wording in the policy that we consider to be not justified, not effective and not consistent with national policy.

Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to present evidence relating to the infrastructure capacity and to demonstrate that the phasing set out in the policy is not justified or effective, which impacts upon the soundness of the DPD.
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**Comment ID:** SASub235  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We support key principle 4 of Policy STM3 which requires the design and layout of the development to be of a high quality and standard which recognises the importance of this location at the entrance to Stamford.

**Participate at Examination:**
### Consultee
487941 Mr M Newton  
Boyer Planning

### Agent

### Consultation Point
Policy STM 3: Mixed Use Urban Extension site in Stamford

### Comment ID: SASub239  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

The key principle 8 requires that the development "Incorporates within the development layout appropriate surface water management systems which will ensure that greenfield run-off rates are maintained once the site is developed".  
Works have been carried out to confirm and demonstrate how that can be achieved.

**Participate at Examination:**
Consultee: 559398  Louise Gill

Consultation Point: Policy STM 3: Mixed Use Urban Extension site in Stamford

Comment ID: SASub212

Type: E-Mail

Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective; Consistent with National Policy

The 1995 Local Plan identifies the land between Tinwell Road and Empingham Road as a prominent area for Special Protection’. This reflects the high environmental quality of the land. The Casterton Road land and the land between Ryhall road and Uffington Road is not covered by these designations. If the land was considered in 1995 to be worthy of protection because of its environmental quality that assessment must still hold true today. The site plays an important role in defining the setting of the town. The setting of the town when viewed from the southeast at Easton on the Hill is a view of exceptional quality and one that should be protected from harmful development. The proposed allocation would irreparably damage these views and the setting of the town.

We believe that the generation of traffic from such a significant development, coupled with standard traffic growth will have a very high impact on traffic on the existing streets and car parking within the already demanding conditions in Stamford (England’s first Conservation Town let it be remembered)

The majority of Stamford’s Schools, the Hospital and, in particular, the retail outlets which have been established on Ryhall Road (Sainsburys will be added shortly) all of which are located on the opposite side of Town to the proposed Tinwell Road / Empingham Road development, thus potentially increasing cross town traffic which has no option but to use an already inadequate street network.

Regarding the significant increase in traffic generation across Stamford it should be borne in mind that virtually all the roads in the town centre are restricted in width, and consequently capacity, due to the prevalence of extensive on-street parking. If this development proceeds do SKDC have plans to impose future restrictions to this on street parking and, if so where are the vehicles to be relocated? In addition do SKDC have plans for increasing the provision of official off-street car parks to reflect and accommodate the increased traffic generation so the increase in population will have a benefit to the ‘High Street Shops’

Councillors and Planning Officers should be aware that they have a great responsibility to allow Stamford to develop in a manner appropriate for the first conservation town in England. This proposed development is totally inappropriate for Stamford and a solution is required which meets the long-term needs of future generations of the Town not the short term solution that is currently being presented with little or no justification, only a potential profit for the Developer!

Changes to make DPD sound:

Re-consider all brown field options within the current boundary of Stamford. Examine options of brown field sites within adjacent planning authorities jurisdiction. Consider suitable development land to the east and northeast of Stamford where traffic generation to the existing retail parks etc. will not have such a high impact on the Town centre.

Re-design a suitable overall, comprehensive document, which considers traffic solutions alongside development requirements for Stamford, which incorporates...
Significant developer financial contributions to the infrastructure using the same approach as the Elsea Park development at Bourne that incorporated the provision of a part of a planned Ring Road for the Town. We understand that in 2009 the Stamford Chamber of Trade and Commerce indicated the possible route of a long term Ring Road that would go a long way towards solving the problems in the Conservation Area.

Acknowledge that the location of the proposed Tinwell Road / Empingham Road development only increases the traffic impact on Stamford and does nothing at all to ease the problem, alternative solutions should be further investigated.

Take into account that should the development proceed a junction with Empingham Road will generate traffic manoeuvres in the vicinity of the existing Malcolm Sargent Primary School and potentially compromise the safety of the school children.

It is understood that it is likely that this site, albeit a greenfield site, is being considered due to the lack of brownfield sites available in Stamford. It is my opinion that greenfield sites should be developed only as a very last resort and in this connection I would ask you to consider brownfield sites in Casterton, namely the disused Williamson cliffe brick works site and the disused quarries in Casterton located just off the route of the Old Great North Road. It is appreciated that SKDC is not the Planning Authority responsible for these two sites as they are in the County of Rutland. However Casterton and Stamford are virtually a continuous, integrated development and I consider that they should be treated jointly in any proposed development plan irrespective of the fact that they are divided by county borders into different authorities. As these are both considered brownfield sites whilst the capacity may not reach 400 houses there are other brownfield sites within Stamford which may contribute to the overall target. This solution would undoubtedly reduce the traffic impact on the town.

Participate at Examination: No
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<th>Consultee</th>
<th>Agent</th>
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<tr>
<td>26053 Mr &amp; Mrs B &amp; P Till</td>
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<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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**Comment ID:** SASub16  
**Type:** Letter  
**Attached Files:** SASub16.pdf

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:**

The 1995 Local Plan identifies the land between Empingham Road and Tinwell Road as a "Prominent area for special protection". The Casterton Road land and the land between Ryhall Road and Uffington Road are not covered by these designations. If the land was considered in 1995 to be worthy of protection because of its environmental quality that assessment must still hold true today.

The site plays an important role in defining the setting of the town which when viewed from the south-east at Easton on the Hill is a view of exceptional quality. This should be protected from harmful development.

The SKDC approved development would irreparably destroy these views and the setting of our town.

The people of Stamford do not want this.

**Changes to make DPD sound:**

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
557675  Mr Stuart Dolby

Agent

Consultation Point
Policy STM 3: Mixed Use Urban Extension site in Stamford

Comment ID: SASub226
Type: E-Mail
Attached Files:

IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound:  No
Unsound because DPD NOT:

We feel deeply concerned regarding the site allocation of agricultural land between Tinwell road and Empingham road for housing development. We urge you to rethink this choice as a site for development because this choice contradicts many of SKDC Core Strategy's policies and objectives. 'South Kesteven prides itself on the attractive countryside that surrounds all settlements' (Core strategy 1.7.11). We feel the western approach to the town will be severely affected by these additional houses. Consultation with some members of the town, we feel was insufficient. 'It is important to recognise that there are other distinct features of the landscape which are important to the locality and which are valued by the local population'. (Core strategy 4.1.4). This consultation has not been comprehensive enough as few people living within the immediate vicinity of this proposed development have not been consulted. Additional houses on this side of town may provide easy access to the A1 but when they wish to access any of the town's facilities (i.e. supermarkets etc) then they will have to travel right through town, adding to the congestion. 'Effective use of land which reduces the need to travel.' (Core strategy 2.1)? If this side of town is still preferred then the RUT1 site has already been dismissed. We understand that SKDC will have to work with Rutland council on this joint project but it appears to have been disregarded because council tax etc will go to Rutland and not SKDC. Therefore, 'working with residents to develop a place where people really matter' (Core strategy 2: Vision) does not appear to be the case. There has been no indication of improvements to existing roads surrounding the proposed development. Is it assumed that these roads will already cope with increased traffic movements even though some are less than adequate (e.g. the exit from Exeter gardens onto Tinwell road)? Both entrances via Empingham road and Tinwell road will add significantly to congestion around these already busy points. Arran road is already used as a central route to cut across town along with Malcolm Sargent school being in close proximity with potential congestion during school times. The Tinwell road entrance will also be problematic as it is a busy road but during peak periods large volumes of traffic leave the A1 or enter onto the A1 from this area.

The site assessment process is again not sufficiently detailed when assessed against other sites. We are not convinced that Market attractiveness and Employment suitability have been explored thoroughly when compared to RUT1 site. We feel this needs to be looked at again. The impact upon the existing built up area is much higher than this assessment indicates for the STAM01/02 sites.

To summarise, we both feel all councillors need to visit all the sites in person to view them more accurately. This initial choice for site allocation of STAM01/STAM02 needs to be looked at again as Stamford's network cannot support this additional movement of traffic and it will tarnish Stamford's character. This choice of allocation contradicts the Core strategy. (Core strategy - Sustainable settlements) 'contributes to the environment in a way which ensures that development does not compromise the quality of life of future and existing generations'.
Changes to make DPD sound:
This initial choice for site allocation of STAM01/STAM02 needs to be looked at again as Stamford's network cannot support this additional movement of traffic and it will tarnish Stamford's character.

Participate at Examination:
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<tr>
<td>603240  Mr David Allen</td>
<td></td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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**Comment ID:** SASub23  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:**

I would like to add my comments on the proposed housing development on the west side of Stamford between Tinwell Road and Empingham Road. I have only recently moved to Stamford from West Deeping where I have led the campaigning since 1999 for a bridge and bypass at Tallington to overcome the horrendous traffic delays which are becoming worse month by month. I am still involved with that.

The Greenfield development proposed by the Commercial Estates Group conflicts with many of the Core Strategy Objectives contained in the SKDC planning document for future development and I comment further as follows:

1. The development is a Greenfield site which is a non-preferred option in the Core Strategy.
2. Building 400 houses would distort the uneven expansion of Stamford towards the west still further causing more commuter traffic into the town centre which already has inadequate local bus, parking and traffic facilities.
3. There is a perfectly good brownfield site just to the east of the town centre where a mixed residential/industrial and social facilities development would provide far more balance to the town. Also, as I understand it, from this development, opportunities would exist for a start on the relief road system which Stamford should have had years ago. It would be a travesty if this site is allowed to be expanded just by more "retail sheds" as has been the case so far. Rather it should be used as a means of making a major enhancement to Stamford as well as providing the necessary number of new houses demanded by the local plan.
4. It is not clear what extra facilities would need to be built on the western site to cater for the 800 plus new residents but the creation of extra health and education facilities would seem to be a minimum to say nothing of the eventual need/likely demand to site a supermarket there also! The existing social facilities near the town centre should be expanded as a first priority and from the eastern site are much more within easy travel and walking distance than the proposed western development.

In summary the western development is a proposal which has no merit and no benefits except towards the developers and I urge you as Stamford SKDC Councillors and our democratic representatives to see that any formal proposal is turned down.

**Changes to make DPD sound:**

**Participate at Examination:**
These fields currently provide a beautiful green space used for agriculture on the edge of Stamford. Most importantly the area also provides a most appropriate approach to our lovely the town as you enter from the west. Any development of such a huge area, to include ‘sheds’ and other light industrial units, would absolutely destroy this approach.

We do of course understand that Stamford needs more housing, but we do feel that the proposal to site houses and light industrial units/sheds on this site is absolutely wrong for the reasons below. Instead we believe that other semi brown field and other sites closer to other light industry or mixed development in Stamford should be used.

We also believe that there are serious traffic implications and highway issues if such a substantial development were to be built between what are already two busy western approach roads into the town.

There is a lot of family housing and one of Lincolnshire’s largest Primary Schools close to the roads that would serve this site – where there are already recognised serious risks for young children going to and from the school. To have even more lorries and cars entering this new proposed site from the busy A1 and the town will massively increase these risks and create further congestion.

I am therefore writing on behalf of my wife & myself, to object to the proposed development on the grounds that:

• the process leading to the identification of the preferred sites is seriously flawed, and

• that the wrong sites have been selected

We consider that is absolutely unacceptable that this site should be preferred over these other two locations for the reasons mentioned above and also more specifically on the following grounds;

• Firstly the 1995 Local Plan identifies the land between Tinwell Road and Empingham Road as a ‘Prominent area for Special Protection. This reflects the high environmental quality of the land. The Casterton Road land and the land between Ryhall road and Uffington Road is not covered by these designations. If the land was considered in 1995 to be worthy of protection because of its environmental quality that assessment must surely still hold true today?

• Secondly the site plays an important role in defining the setting of the town. The setting of the town when viewed from the south-east at Easton on the Hill is a view of exceptional quality and one which should be protected from harmful development. The proposed allocation would irreparably damage these views and the setting of the town.

We are therefore strongly opposed to this site for proposed development and instead would suggest the selection of a site which is more appropriate and not in
such a sensitive area on one of the town’s most historic approaches.

**Changes to make DPD sound:**
We are therefore strongly opposed to this site for proposed development and instead would suggest the selection of a site which is more appropriate and not in such a sensitive area on one of the town’s most historic approaches.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>607535 Mr &amp; Mrs Trevor and Diana Johnson</td>
<td></td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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**Comment ID:** SASub180  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No  

**Unsound because DPD NOT:**

Objections to any development on the land. This has always been agricultural ground producing crops.

Since the changes to the A1 (at Carpenters Lodge) much more traffic accesses the town via Tinwell Road. It is very important to keep this most attractive entrance to our beautiful market town.

We are shortly to have Sainsbury’s store on the Eastern side of the town on a retail park already in existence to join Lidl and Morrisons. In order to alleviate the centre of the town from further traffic congestion it would be far more preferable to allocate any further necessary development to take place if this was on that side of our town.

We therefore strongly urge you to leave this field alone.

**Changes to make DPD sound:**

**Participate at Examination:**
Consultee: Mr M Newton
Agent: Boyer Planning

Consultation Point: Policy STM 3: Mixed Use Urban Extension site in Stamford

Comment ID: SASub232
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
The policy requires that the proposed development "Provides a small scale local centre appropriate to the size of the development, which is located as to be of benefit to both new occupants of the site as well as the occupants of existing housing areas to the north and east."
This key principle of Policy STM3 is considered to be sound.

Participate at Examination:
Consultee: Ms Anna Russo

Comment ID: SASub166
Type: Letter

Legal Compliance Reasons:
Unsound because DPD NOT:
Stamford will gain nothing by adding more cause for congestion. The proposed site is totally unsuitable for housing, being very close to main approaches to the A1, which has become a bottleneck at peak traffic time from Tinwell road junction down to Wansford.
the town centre is too small and already suffers from lack of parking. I know many people who have real problems trying to get to the Post office or banks. Most residents only need to pop into town briefly and parking charges are expensive.
There needs to be very careful thought given to the supporting infrastructure for such a large development.

Changes to make DPD sound:
Participate at Examination:
The proposed site was previously described by the Inspector as, "The site is prominently located outside the existing built up area, and on one of the main approaches to the town. Development on this site would appear incongruous and detrimental to the town".

The supermarkets, business parks, garages, doctor's and dentist's surgeries, the hospital, senior schools, the Stamford College, the proposed 1,500 seat football stadium, and all the major employers are all situated in the East of the town.

Cross town traffic is already congested, and any road widening or improvements would be very difficult. Building a large scale housing development in the West of the town will only make the situation worse.

Some shops already exist in Sutherland Way, and the general store has frequently changed hands. Shoppers prefer the choice and lower prices found in supermarkets, and an additional few small shops will not prevent an increase in cross town journeys.

The DPD calls for a new road to link Empingham Road with Tinwell Road, where there is approximately 150 metres between the A1 slip road and the first house towards Stamford, which is The Church Of Latter Day Saints. The Tinwell Road has a 40 mph limit, and my understanding is that a visibility splay of 120 metres in either direction, 4.5 metres back from the junction of the access road and Tinwell Road will be required. This will necessitate the removal of the existing hedgerows and trees, and thus spoil one of the most attractive approaches to the town, and destroy the view of the town from the A1 and A43.

Furthermore, the church frequently has a number of cars coming on to and leaving their car park, and along with the busy A1 slip road in the opposite direction and the existing traffic, any new junction could be a safety hazard.

Included in the DPD, is a requirement for the developer to provide a landscaped corridor between the existing residential area and the new development. At the recent exhibition by the developer, no corridor was shown in his proposals. When questioned, his representative’s stated that they proposed providing a new road parallel to Lonsdale Road, and the rear gardens of the new properties would back on to the rear gardens of the existing Lonsdale Road gardens, and that would constitute a landscaped corridor.

However this completely contradicts the following statement which was included in a publication the developer produced and delivered to the local residents, "(As attached).Sensitive landscape solutions would be incorporated between existing and future properties to protect visual amenity".

It appears he will ignore the requirement of the DPD.

Changes to make DPD sound:

Participate at Examination:
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<tr>
<td>26084</td>
<td>Mrs Margaret Chirico</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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</table>

**Comment ID:** SASub158  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:**

1. We comment in particular on the allocation of previous green belt land on the West side of Stamford between Empingham Road and Tinwell Road for major mixed development.
2. We made detailed representations to the Planning Department and to Councillors before the decision was taken to release the land.
3. We consider that decision to be flawed, in relation to the completely foreseeable impact of development in terms of traffic flow and environmental degradation. We believe that additional traffic into and out of the already congested town centre and to the commerce on the north and east sides of Stamford would cause chaos and further environmental pollution. Has anyone seriously examined the junctions of Empingham Road and Scotgate, Roman Bank and Tinwell Road, Tinwell Road and Westgate/Rutland Terrace?

**Changes to make DPD sound:**

**Participate at Examination:**
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<tr>
<td>605036 Mrs Lisa Staunton</td>
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<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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**Comment ID:** SASub48  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** No  
**Legal Compliance Reasons:** Contrary to government guidelines where development of brown field sites over green field sites.

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Consistent with National Policy

This site was described in the last local plan by the inspector as follows (sic)the site is prominently located outside the existing built up area and on one of the main approaches to the town. Development on this site would appear incongruous and detrimental to the town. It was also described as an area of outstanding natural beauty, this development is not for the people of Stamford it appears to be catering for commuting homeowners and as such will be domicile housing.

**Changes to make DPD sound:**

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
26085  Mr John B Gibson

Agent

Consultation Point
Policy STM 3: Mixed Use Urban Extension site in Stamford

Comment ID: SASub203
Type: Letter
Attached Files: SASub203.pdf

IS DPD Legally Compliant:

Legal Compliance Reasons:

Is DPD Sound:  No

Unsound because DPD NOT:

The proposed 400 houses will generate at least a further 600 cars on the already congested roads into the town. There are just 2 roads, Empingham Road (A606) and Tinwell Road (A6121) leading from the proposed sites that will take traffic either into the town centre or to the east of the town where the majority of supermarkets, the hospital, dental surgery and the majority of the schools are located. For traffic travelling to the east of the town, the 2 roads converge at the traffic lights at the junction of Scotgate, West Street and North Street (Point 1 on the attached map) where it also joins with traffic from the old Great North Road - Casterton Road (B1081). For traffic travelling into the centre of the town these 3 roads converge at Red Lion Square (Point 2) where there is already complete traffic chaos for most of the time as a result of the ill thought out Gateway project.

Considering these 3 roads and affected roads in more detail:

1. Empingham Road (A606). Over the past 40 to 50 years a total of 9 access roads to this road have been made from housing developments and the A1 Trunk Road without any improvements whatsoever to the road itself. In addition a large number of houses and a primary school have been built with direct access onto the road itself. At the eastern end of the road, near its junction with Casterton Road (Point 3), cars parked on the steep hill result in the road becoming single lane for most of the day (photograph 1).

2. Empingham Road/Scotgate Junction (Point 4). This junction is difficult for drivers of vehicles joining Scotgate from Empingham Road due to the angle with Casterton Road obscuring the drivers view to the left. The problem is exacerbated by parked cars on Casterton Road, some belonging to residents and being there semi-permanently, again causing single file flow. Many local drivers avoid this junction by using Foundry Road as a 'Rat run' from Empingham Road to West Street to approach the junction with Scotgate (Point 1) at a right angled cross roads controlled traffic lights. This is not a good idea as Foundry Road has both a Primary School and a Nursery School on it and, yet again, is reduced to single file by parked cars, most of which are there all day (see Photo 2).

3. Tinwell Road (A6121). At the eastern end of the road, between its junction with Roman Bank and the junction with West Street (Point 5), cars parked on both sides of the road again result in the road becoming single land for most of the day (See photo 3).

4. Rutland Terrace, St Peter's Street and All Saints Street (A16121 continued). Traffic from the west heading into the centre of the town has to encounter further areas of single file traffic in these 3 roads, after it leaves Tinwell Road, caused by parked cars (see photo 4).

5. Stamford Bypass (A1). Whenever there is an accident on this part of the A1 traffic immediately diverts through the centre of the town causing massive traffic jams and lengthy delays. If even more vehicles are added to the flow through the town, as a result of this development, complete gridlock will result at such times.
If the proposed solution is to ban parking in the above areas there will be even further loss of car parking spaces in Stamford strangling the town even more than has been done already.

Summary. The roads in and around Stamford town centre quite simply cannot accommodate any further increase in traffic. To build more houses on the western side of the town when most of the supermarkets, shops, facilities and schools are on the eastern side is sheer lunacy and must be prevented. If, and only if, a need for further housing in Stamford is positively identified, as opposed to an arbitrary figure imposed by higher authority, then this must be on the eastern side of the town.

Changes to make DPD sound:

Participate at Examination:
Consultee: Mr Tim Lee
Stamford Chamber of Trade and Commerce

Consultation Point:
Policy STM 3: Mixed Use Urban Extension site in Stamford

Comment ID: SASub100
Type: E-Mail

IS DPD Legally Compliant:
Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT:
Our chamber opposes the development proposed in the DPD of the West site between Empingham Road and Tinwell Road as an urban extension of Stamford: on the grounds that any development on the west will damage the setting in the landscape of Stamford; such a development on the West will be located well beyond normal walking distance from the Stamford town centre facilities thus actively encouraging more car use; such a development will be a coalescence of Stamford in Lincolnshire with Tinwell in Rutland
see attachment for further details.

Changes to make DPD sound:
By selecting our Chamber’s East urban extension site instead of any of the three urban extension sites considered in the DPD.
see attachment for further details.

Attached Files:
APPENDIX A 0.pdf; SASub100.pdf; email chain [2].pdf; email chain [1].pdf; APPENDIX A 2.pdf; APPENDIX A 3.pdf; APPENDIX A 4.pdf; APPENDIX A 5.pdf; APPENDIX A 6.pdf; APPENDIX A 7.pdf; APPENDIX A 8.pdf; APPENDIX B 0.pdf; APPENDIX B 2.pdf; APPENDIX C 0.pdf; APPENDIX C 3.pdf; APPENDIX C 4.pdf; APPENDIX C 5.pdf; APPENDIX D 0.pdf; APPENDIX E 0.pdf; APPENDIX F 0.pdf; APPENDIX F 2.pdf; APPENDIX G 0.pdf; APPENDIX G 2.pdf; APPENDIX G 3.pdf; APPENDIX H 0.pdf; APPENDIX J 0.pdf; APPENDIX J 2.pdf; APPENDIX K 0.pdf; APPENDIX L 0.pdf; APPENDIX L 2.pdf; APPENDIX M 0.pdf; APPENDIX M 2.pdf; APPENDIX N 0.pdf; APPENDIX O 0.pdf; APPENDIX O 2.pdf; APPENDIX O 3.pdf; APPENDIX O 4.pdf; APPENDIX Q 0.pdf; APPENDIX Q 2.pdf; APPENDIX Q 4.pdf; APPENDIX R 4.pdf; APPENDIX R 6.pdf; APPENDIX S 0.pdf; APPENDIX T 0.pdf; APPENDIX T 2.pdf; APPENDIX T 3.pdf; APPENDIX ZB.pdf; APPENDIX ZC.pdf; APPENDIX ZD.pdf; APPENDIX ZE.pdf; APPENDIX ZF 0.pdf; APPENDIX ZF 2.pdf; APPENDIX ZG 0.pdf; APPENDIX ZH 0.pdf; APPENDIX ZH.pdf; APPENDIX ZI 0.pdf; APPENDIX ZI 0.pdf; APPENDIX ZJ 2.pdf; APPENDIX ZK 0.pdf; APPENDIX Q 3.pdf; APPENDIX Q 5.pdf; APPENDIX R 0.pdf; APPENDIX R 2.pdf; APPENDIX D 2.pdf; APPENDIX R 3.pdf

Page 123 of 309
Participate at Examination: Yes

We wish to be kept informed of matters related to the SKDC LDF Site Allocation and Policies DPD and we wish to be present and speak at the Independent Examination of the DPD.
IS DPD Legally Compliant: No

Legal Compliance Reasons:

Unsound because DPD NOT:
The 1995 Local Plan identifies the land between Tinwell Road and Empingham Road as a prominent area for Special Protection’. This reflects the high environmental quality of the land. The Casteron Road land and the land between Ryhall road and Uffington Road is not covered by these designations. If the land was considered in 1995 to be worthy of protection because of its environmental quality that assessment must still hold true today.

The site plays an important role in defining the setting of the town. The setting of the town when viewed from the southeast at Easton on the Hill is a view of exceptional quality and one that should be protected from harmful development. The proposed allocation would irreparably damage these views and the setting of the town.

We believe that the generation of traffic from such a significant development, coupled with standard traffic growth will have a very high impact on traffic on the existing streets and car parking within the already demanding conditions in Stamford (England’s first Conservation Town let it be remembered)

The majority of Stamford’s Schools, the Hospital and, in particular, the retail outlets which have been established on Ryhall Road (Sainsburys will be added shortly) all of which are located on the opposite side of Town to the proposed Tinwell Road / Empingham Road development, thus potentially increasing cross town traffic which has no option but to use an already inadequate street network.

Regarding the significant increase in traffic generation across Stamford it should be borne in mind that virtually all the roads in the town centre are restricted in width, and consequently capacity, due to the prevalence of extensive on-street parking. If this development proceeds do SKDC have plans to impose future restrictions to this on street parking and, if so where are the vehicles to be relocated? In addition do SKDC have plans for increasing the provision of official off-street car parks to reflect and accommodate the increased traffic generation so the increase in population will have a benefit to the ‘High Street Shops’

Councillors and Planning Officers should be aware that they have a great responsibility to allow Stamford to develop in a manner appropriate for the first conservation town in England. This proposed development is totally inappropriate for Stamford and a solution is required which meets the long-term needs of future generations of the Town not the short term solution that is currently being presented with little or no justification, only a potential profit for the Developer!

Changes to make DPD sound:

Re-consider all brown field options within the current boundary of Stamford. Examine options of brown field sites within adjacent planning authorities jurisdiction. Consider suitable development land to the east and northeast of Stamford where traffic generation to the existing retail parks etc. will not have such a high impact on the Town centre.

Re-design a suitable overall, comprehensive document, which considers traffic solutions alongside development requirements for Stamford, which incorporates
significant developer financial contributions to the infrastructure using the same approach as the Elsea Park development at Bourne that incorporated the provision of a part of a planned Ring Road for the Town. We understand that in 2009 the Stamford Chamber of Trade and Commerce indicated the possible route of a long term Ring Road that would go a long way towards solving the problems in the Conservation Area.

Acknowledge that the location of the proposed Tinwell Road / Empingham Road development only increases the traffic impact on Stamford and does nothing at all to ease the problem, alternative solutions should be further investigated.

Take into account that should the development proceed a junction with Empingham Road will generate traffic manoeuvres in the vicinity of the existing Malcolm Sargent Primary School and potentially compromise the safety of the school children.

**Participate at Examination:**
**Comment ID:** SASub132  
**Type:** E-Mail  
**Attached Files:** SASub132.pdf  

**Is DPD Legally Compliant:**  
**Legal Compliance Reasons:**  

**Is DPD Sound:** No  
**Unsound因为DPD NOT:** Justified; Effective; Consistent with National Policy

Pressure on Stamford town infrastructure, particularly on roads and town parking. Congestion will be a major problem and may be detrimental to town centre retailers. Safety; road exits onto Empingham Road are very close to a major A1 junction, a large primary school and and exit from a large estate, serious accidents could well happen.

Three major supermarkets, a retail park and a proposed new retail park are on the other side of Stamford. The only route is through the centre of town which is already congested.

Medical facilities are all more accessible from the east and again involve travelling through the town. This may present access difficulties, particularly if the proposed plan includes affordable housing and housing for the elderly.

Schooling: The senior school is on the other side of Stamford, and Stamford does not have adequate academic 6th form provision.

Green Field site. The proposed site is a large productive green field site. There are brown field sites on the east side of Stamford which would be more appropriate for development.

**Changes to make DPD sound:**

This development should be reconsidered.

**Participate at Examination:** No
<table>
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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>605165 Mr A Jennings</td>
<td></td>
<td>Paragraph (3.2.15)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub182

**Type:** Letter

**Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

I disagree with these assessments. There is a very high sensitivity to development at the edge of these settlements. It is this that a visitor first sees.

**Changes to make DPD sound:**

**Participate at Examination:**
My client has the benefit of a planning permission (S06/0614 & S09/2773) to develop a site known as The Bone Mill, at the eastern end of The Slip. Planning permission exists for the substantial conversion and extension of the existing buildings to create 19 industrial units with a gross floor area of 4900 sq.m. The balance of the red lined area is identified for use as car parking and ancillary storage. The planning conditions are in the process of being discharged and a commencement will be made very shortly.

My client considers that the site, with a consent for a substantial quantum of floorspace, warrants allocation, simply by virtue of the planning permission that is in place. It is considered that significant commitments such as this should be appropriately reflected on the proposals map, either as an allocation, or as an area of employment land to be protected.

More fundamentally, my client considers that there is scope to accommodate significant additional floorspace, for B1 employment purposes within the extent of the red lined area, in particular alongside and to the south of the proposed road serving. This part of the approved application site is already consented for storage uses without any restrictions in terms of height etc, save that it is ancillary to the primary site uses. Details of the type of development contemplated is illustrated in the attached document.

On the basis of the existing planning permission (which has been in place for many years), it is considered that the site should be allocated.

The Evidence Document, which identifies the site is flawed in terms of the information it contains. The Summary Spreadsheet comments upon the site as follows; Cordon sanitaire, therefore Anglian Water objection rules site out for residential development. May be suitable for localised "bad neighbour" use, subject to suitable access being established.

These comments are somewhat surprising for several reasons. The site appears to have been rejected on the basis of a cordon sanitaire, which we understand applies to residential uses, not employment uses. Similarly, whilst the summary spreadsheet identifies that the site may be suitable for bad neighbour uses, subject to suitable access being established, this fails to take account of the fact that the site already has planning permission for redevelopment for B2 purposes. This includes a full specification adoptable standard access road serving the site from Cherry Holt Road. Thus, the development of roughly 50,000 sq.ft of employment floorspace, has already been approved by the local highway authority.

Other issues flagged in the Evidence Document, relating to contamination and flood risk have already been dealt with and found acceptable as part of the planning application process.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Thus none of the reasons for non inclusion set out in the Evidence Document can be sustained;

• The site is not a residential use and therefore the cordon sanitaire objection does not apply.
• The site already has the benefit of planning permission for 50,000 sq.ft of industrial floorspace. The site will be accessed by a new adoptable standard road (approved) and this will provide scope / capacity for additional development to be served from it.
• Contamination issues have been dealt with as part of the approved planning application and conditions attached to it
• Flood risk issues have been dealt with and approved as part of the planning application process.

We would therefore contend that the evidence base underpinning Policy B1 (Bourne employment allocations) is unsound.
[see also accompanying attachment]

Changes to make DPD sound:
My client requests the inclusion of site BOUR17 (The Slipe) as an employment site under Policy for B1 purposes. This amendment is sought on the basis of the extant consent (demonstrating its suitability) and the potential to accommodate additional development within the confines of the approved site.

Participate at Examination: Yes
The respondent wishes to make representations upon the process leading to the identification of preferred site and the relative merits of the identified sites in Bourne
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<tr>
<th>Consultee</th>
<th>Agent</th>
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<tbody>
<tr>
<td>26270</td>
<td>Miss Gill Brown</td>
<td>Policy B1: Employment Allocations in Bourne</td>
</tr>
<tr>
<td>Bigwood</td>
<td>25977 Mr N Gough</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Bigwood Associates</td>
<td></td>
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</table>

**Comment ID:** SASub171  
**Type:** E-Mail  
**Attached Files:** SASub171.pdf

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**  
Effective; Consistent with National Policy

It cannot possibly be said that South Kesteven District Council have had a coherent strategy for the provision of Employment by failing to allocate the triangular area of land east of the Carr Dyke identified in our submissions. There is no planning rationale, no consistency or coherent strategy flowing from the Council’s actions in failing to allocate that triangular area. It appears to be a simple discrepancy in plan colouring! For this reason, as the Employment allocations are not coherent or reasonable, the policy therefore is not sound and reasonable and should be amended accordingly.

Plans have to be flexible but it seems that this is just a simple error by the planning authority not to allocate this triangular area and under the flexible approach the land should be allocated accordingly.

**Changes to make DPD sound:**

We seek the inclusion of the majority of this triangular area within the Employment allocation under B1a to properly and reasonably complete the Employment allocation with the consequential small increase in the allocation site area.

**Participate at Examination:** Yes
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
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<tbody>
<tr>
<td>607203 Mr Peter Harvey</td>
<td>372868 Robert Doughty</td>
<td>Policy B1: Employment Allocations in Bourne</td>
</tr>
</tbody>
</table>

Lindum Group

Comment ID: SASub139

Type: E-Mail

Attached Files: SASub139 and 140.pdf

IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified

The DPD fails to identify land off South Road, Bourne for roadside services and other uses. The land has had a number of planning approvals for development in the past and discussions are ongoing with the Planning Authority about proposals to develop the land.

Changes to make DPD sound:

The DPD should refer to the land known to be available off South Road, Bourne, which is essential to deliver the road connection referred to in 3.2.9 of the DPD, and identify the land on the Proposals Map, as per the accompanying location plan.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 26270  Miss Gill Brown
Agent: 25977  Mr N Gough
Consultation Point: B1a

Comment ID: SASub172
Type: E-Mail
Attached Files: SASub172.pdf

IS DPD Legally Compliant: Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT: Effective; Consistent with National Policy

The DPD is not consistent with national policy in providing for a range of accommodation for the elderly across its District. There is no appropriate Core Strategy proposal but this does not mean that there cannot be appropriate site allocations. Care for the elderly requires specialist accommodation and will not be provided by the market house builders. The DPD does not meet the consistency tests either in terms of its application of national planning policy or relevant community strategy with regard to the provision of care for the elderly.
There would appear to be no coherent strategy for the provision of accommodation for care of the elderly and certainly there is nothing in the DPD which addresses the huge need and demand for this specialist accommodation increasing as it will in the future. For this reason the DPD is deficient and our proposed amendment goes a small way to addressing the concern and making some provision.
The plan is not sufficiently flexible for it to deal with changing circumstances and it is clear that the planning authority have failed in their duty to make proper allocations for the elderly and for their specialist accommodation which is proper and reasonable land use allocation and where many planning authorities have already started to address the concerns through appropriate policies and site allocations. As such, our proposal goes some small way to meet those concerns.

Changes to make DPD sound:
We seek an amendment of Policy B1 to offer the appropriate planning alternative for a C2 care use for the elderly on part of the B1a allocation area.

Participate at Examination: Yes
## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>26579</td>
<td>Mr W Croft</td>
<td>B1c</td>
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**Comment ID:** SASub26  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

I was infected with asbestos some years back and I quickly realised that I was susceptible to most industrial dusts.

I retired from work early (60) and moved to Bourne where the air is cleaner, we were told that in due course a school may be built at the bottom of our garden, this was fine but on reading your proposals at the council offices I find that you have now changed your minds to "Employment", we were told it could be factory units and I would be back to being exposed to industrial dust.

Due to my health problems I object to your proposals, I have plural thickening and pleural plaques, and I am registered disabled.

**Changes to make DPD sound:**

**Participate at Examination:** No
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<tr>
<td>26231 Mr D Bainbridge</td>
<td>Bidwells</td>
<td>Paragraph (3.3.10)</td>
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</table>

**Comment ID:** SASub110  
**Type:** E-Mail

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified

Paragraph 23.3.10 states that the Core Strategy established a need for 23 hectares of additional employment land at The Deepings. Policy E1 in the Core Strategy states that approximately 23 hectares of land to provide a broad and flexible portfolio of site. It is requested that Paragraph 3.3.10 reflects Policy E1. Without an accurate reflection of Policy E1, paragraph 3.3.10 is not justified.

**Changes to make DPD sound:**
Change paragraph 3.3.10 to:
"The Core Strategy seeks approximately 23 hectares of additional employment land to provide a broad and flexible portfolio of sites and to retain and enhance locally important existing areas of employment."

**Participate at Examination:** Yes  
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

**Consultee**
605314  Annette Hewitson  
Environment Agency

**Comment ID:** SASub78  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective; Consistent with National Policy

This paragraph wrongly states that there is sufficient capacity at the Deepings Waste Water Treatment Works. The latest evidence in respect of this is contained in the Detailed Water Cycle Study, Final Report, November 2011. This document highlights that there is no capacity to treat additional wastewater at Deepings Waste Water Treatment Works until a new permit is negotiated and obtained, and the technical requirements implemented. This could take at least 5 years to resolve and the site allocations in this area phased for 2011-2016 (DE1a & DE1b) will therefore not be deliverable. The allocation phasing is also contrary to National Policy contained in PPS1 and PPS12, which both require consideration of environmental capacity and environmental protection in decision making.

**Changes to make DPD sound:**

The paragraph needs updating to reflect the findings of the Detailed Water Cycle Study, November 2011. This should be amended to read: The Detailed Water Cycle Study, November 2011 highlights that there is no capacity to treat additional wastewater at Deepings Waste Water Treatment Works until a new permit is negotiated and obtained, and the technical requirements implemented. This could take at least 5 years to resolve and development should not take place until adequate capacity is available.

**Participate at Examination:** Yes  
Insufficient capacity at Waste Water Treatment Works has significant implications for the environment and compliance with the Water Framework Directive. Development should not be allowed to go ahead until adequate infrastructure is in place.
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>26231 Mr D Bainbridge</td>
<td>Bidwells</td>
<td>Paragraph (3.3.15)</td>
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</table>

**Comment ID:** SASub108  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified

The first bullet point under Paragraph 3.3.15 states that the discharge consent for the Deeping WxTW represents a constraint to the overall capacity of the works in the initial phase of the plan period. Under the Deepings heading on page 39 of the Detailed Water Cycle Study, Part One (15 August 2011) is the following text:

"The discharge consent for Deeping WwTW was modified at the start of AMPS (fifth cycle of asset management planning which commenced in April 2010). The consent was increased following investigations and negotiations between Anglian Water and the Environment Agency to reflect the pressure of existing demands for wastewater treatment. This means that any additional flow will exceed the consented discharge limit and trigger a review of the consent. Until a revised consent is investigated, reviewed, and agreed Anglian Water is not in a position to accept any additional flow."

There is reference to a Part Two but this has not been made available as part of the evidence base and therefore the content and conclusions of this can not be known. Further evidence should be made available on the discharge consent issue prior to submission of the SAP DPD because of the implications for potential phasing of development at The Deepings. In the absence of further evidence the concern is that paragraph 3.3.15 is not sound because it is not based on robust, credible up-to-date evidence.

**Changes to make DPD sound:**

Detailed Water Cycle Study, Part Two and additional relevant information from Anglian Water should be made available as part of the evidence base and considered prior to the submission of the SAP DPD.

**Participate at Examination:** Yes  
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
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<th>Consultation Point</th>
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<tr>
<td>605165</td>
<td>Mr A Jennings</td>
<td>Paragraph (3.3.20)</td>
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**Comment ID:** SASub183  
**Type:** Letter  
**Attached Files:**

**Is DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

I disagree with these assessments. There is a very high sensitivity to development at the edge of these settlements. It is this that a visitor first sees.

**Changes to make DPD sound:**

**Participate at Examination:**
Consultee: 26231 Mr D Bainbridge
Agent: Bidwells

Comment ID: SASub112
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
No changes. Support:
Paragraph 3.3.21 is sound because it is based on robust and credible evidence base.
The Landscape Sensitivity and Capacity Study, January 2011, identifies the majority of Land Between Peterborough Road and Towngate East (Policy DE3) as being of low landscape sensitivity and high landscape capacity. Therefore, DE3 is supported by this part of the evidence base.

Participate at Examination: Yes
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
Consultee: 26231  Mr D Bainbridge
Agent: Bidwells

Comment ID: SASub113  Type: E-Mail  Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Effective

The first sentence in paragraph 3.3.2.1 states:
"Provision is made in this plan for development of 600 new homes in Market Deeping and Deeping St James for the period to 2026."
However, the 3 no. bullet points under this paragraph comprises 700 dwellings. As it is written the paragraph is not able to be clearly and definitive monitored. In the interests of consistency it is suggested that 700 dwellings (and not 600 dwellings) is stated in the first sentence of paragraph 3.3.2.1.

Changes to make DPD sound:
In the interests of consistency it is suggested that 700 dwellings (and not 600 dwellings) is stated in the first sentence of paragraph 3.3.2.1.

Participate at Examination: Yes
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
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<th>Consultee</th>
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<tbody>
<tr>
<td>358688</td>
<td>224831</td>
<td>Policy DE1: Housing Allocations in The Deepings</td>
</tr>
</tbody>
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**Comment ID:** SASub71  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**  
**Is DPD Sound:** No  
**Unsound because DPD NOT:** Consistent with National Policy

Government advice such as Planning Policy Statement 3 and emerging policy such as the Draft NPPF encourages local planning authorities to provide for an adequate supply of land for housing. Additional housing land is proposed east of Broadgate Lane at Deeping St James to provide greater flexibility as a proportion of the current housing allocations are unlikely to be developed in the plan period.

**Changes to make DPD sound:**  
An additional housing allocation is proposed east of Broadgate Lane at Deeping St James on land owned by Christ Church, as identified in the Council SHLAA. The western part of the site fronting Broadgate Lane is proposed for fifteen dwellings incorporating five affordable dwellings. The entire site is proposed for 150 dwellings incorporating thirty affordable dwellings. Location plans will be submitted to the District Council to identify the site boundaries.

**Participate at Examination:** No
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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>597902 Mr Harjinder Kumar</td>
<td>597895 Mr Harjinder Kumar</td>
<td>Policy DE1: Housing Allocations in The Deepings</td>
</tr>
<tr>
<td>Peterborough City Council</td>
<td>Peterborough City Council</td>
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**Comment ID:** SASub20  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We find the policy to phase the housing allocations in Market Deeping (in accordance with paragraphs 3.5.1 to 3.5.5) is a sound approach. In the past, we had expressed concerns about the level of housing development in market towns around Peterborough and on the A15 corridor. Our view was that this resulted in increased commuting to Peterborough for jobs and services. Phasing of development will ensure that investment in infrastructure will be in place to accommodate development and may prevent developers from ‘cherry picking’ sites in Market Deeping at the expense of those in Peterborough, within the same housing market area. We support this phasing approach.

**Participate at Examination:** No
Consultee
607543 Mrs Anne Davis

Agent

Consultation Point
Policy DE1: Housing Allocations in The Deepings

Comment ID: SASub179
Type: Letter
Attached Files: SASub179.pdf

IS DPD Legally Compliant:

Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective

From previous conversations with the planners on this they have suggested that our site is not to be included due to its relatively remote position from the village.

I would like to say that the development in Briars Walk ONE of the new developments in our village of Frognall just 200 metres along the Spalding Rd taken just a 3 minutes walk from Frognall Livery which is also in to the village of Frognall other houses in the village are even closer to us, we have amenities on the land such as water & electric & drainage my son used to walk for just 15 minutes to Market Deeping to work every day.

We have the Goat & the Rose pub in Frognall our nearest shop is a 7 minutes walk away, we have a bus stop 5 min walk. Bus stops 10 walk taken you into Peterborough Bourne and Stamford.

We can walk to all the amenities within 10 min such as Schools the library shops sports facilities bus stops more pubs etc plus a 7min drive to Tescos the Co op & petrol St.

My son who was 8 when we moved to Frognall & I have lived at Frognall livery for 12 years and have never felt too far from any amenities. We also have houses on all four sides of the land some further out of the village some newly built.

We have 2 developments finished in our small village so we do not see how we can be too far out when our village is small plus our land runs along the same stretch of the Spalding Road as the new developments in Frognall.

I would like very much for someone to come and have another look at the position of Frognall livery now with all the new developments in Frognall finished.

Changes to make DPD sound:

Participate at Examination:
Consultee: Mr D Bainbridge
Agent: Bidwells
Consultation Point: Policy DE1: Housing Allocations in The Deepings

Comment ID: SASub109
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT: Justified

The phasing in Policy DE1 is not sound because it is not founded on a robust and credible evidence base and is not necessarily the most appropriate strategy when considered against the reasonable alternatives.

The phasing is explained in paragraph 3.3.2.2 in the SAP DPD. The second sentence in this paragraph states:
"The phasing of sites has been influenced by evidence relating to infrastructure constraints, particularly wastewater infrastructure, which will require improvement to accommodate new housing."

However, as per the response to paragraph 3.3.15, Detailed Water Cycle Study Part Two should be made available as part of the evidence base because currently the content and conclusions of this can not be known. Further evidence should be made available on the discharge consent at Deeping WwTW prior to submission of the SAP DPD.

In the absence of further evidence the concern is that phasing in Policy DE1 is not sound because it is not based on robust, credible up-to-date evidence.

There is no justification for the phasing of delivery of 100 dwellings at sites DE1a and DE1b during the period 2011 to 2016 when this amount of dwellings can readily be delivered at site DE1d(DE3).
Currently there is no vehicular access to DE1a. This is proposed to be access through an existing development site and across consented residential land. The total maximum amount of dwellings to be served off a single T-junction located on Godsey Lane, will be 300 dwellings (comprising up to 95 dwellings commenced on 1 no. site, up to 120 dwellings consented on 1 no. site and 85 dwellings (indicative) on proposed site DE1a). It is considered that delivery of site DE1a during the period 2011 to 2016 is uncertain due to differences in land ownership, the absence of access other than third party land and also because a single t-junction without an emergency access provision is not sufficient for up to 300 dwellings.

Changes to make DPD sound:
Detailed Water Cycle Study, Part Two and additional relevant information from Anglian Water should be made available as part of the evidence base and considered prior to the submission of the SAP DPD.
Considerations should be given to the proposed phasing of sites under Policy DE1.
It is requested that DE1d(DE3) is identified for delivery in the period 2011 to 2021.
Participate at Examination: Yes
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
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<th>Consultee</th>
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<tr>
<td>605314 Annette Hewitson</td>
<td>Environment Agency</td>
<td>DE1a</td>
</tr>
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</table>

**Comment ID:** SASub79  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective; Consistent with National Policy

This allocation is phased to take place between 2011-2016. The SKDC Detailed Water Cycle Study, Final Report, November 2011 identifies that there is no capacity to treat additional wastewater at the Deepings Waste Water Treatment Works. It requires a new permit to be negotiated and obtained and the technical requirements to be implemented, which could take at least 5 years. It should also be noted that there may be a delay of up to two years from commencement of any necessary works before developments could be connected to the sewerage system. As such, we do not believe this site is deliverable within the phase stated in the document. The allocation phasing is also contrary to National Policy contained in PPS1, PPS12 and PPS23, which all require consideration of environmental capacity and environmental protection in decision making.

**Changes to make DPD sound:**

The phasing for this site should be amended to read 2016-2021 so that the sewage and sewerage issues can be resolved before development commences.

**Participate at Examination:** Yes

Insufficient capacity at Waste Water Treatment Works has significant implications for the environment and compliance with the Water Framework Directive. Development should not be allowed to go ahead until adequate infrastructure is in place.
Consultee: Mrs P R MacKenzie

Is DPD Legally Compliant: No
Legal Compliance Reasons:

Unsound because DPD NOT:
1 This small market town will be overwhelmed by so many new houses.
2 The infrastructure is already under strain and this is a drought area.
Water, drainage, schools, medical facilities and congested roads.
3 Some of the best agricultural land is in Lincolnshire. We are told that we should grow more of our own food. These houses will be built on good agricultural land.
4 Land by the Health Centre was originally designated for a nursing/retirement home and retirement bungalows. This was lost when the building went out of business. We had hoped for this land near the Health Centre to be re-designated.
5 A survey some years ago found more people over 55 than under. There is a large ageing population in this area. I believe that more people are expected to be cared for in their own homes. More elderly people are suffering from dementia and need care homes. We need provision for these people with affordable care homes and a purpose built day centre to combat loneliness and to provide respite for carers.
6 How many homeless people, or people needing homes are there in the Deepings?
7 There are not enough jobs in Deepings for all the new residents. This means more congestion for commuting on already busy roads. Why not build houses near to places where jobs are available?
8 The council is getting money from Persimmon and will get more council tax, but local residents cannot see any benefit. They see pressure on services, congestion and no extra facilities for the elderly and disabled. Bus services have been cut to the east of the town and we have never been given a service on the west side.

Changes to make DPD sound:

Participate at Examination:
### Site Allocation DPD: Submission October 2011 - Consultee Comments

**Consultee**
605314  Annette Hewitson  Environment Agency

**Agent**

**Consultation Point**
DE1b

**Comment ID:** SASub80  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective; Consistent with National Policy

This allocation is phased to take place between 2011-2016. The SKDC Detailed Water Cycle Study, Final Report, November 2011 identifies that there is no capacity to treat additional wastewater at the Deepings Waste Water Treatment Works. It requires a new permit to be negotiated and obtained and the technical requirements to be implemented, which could take at least 5 years. It should also be noted that there may be a delay of up to two years from commencement of any necessary works before developments could be connected to the sewerage system. As such, we do not believe this site is deliverable within the phase stated in the document. The allocation phasing is also contrary to National Policy contained in PPS1, PPS12 and PPS23, which all require consideration of environmental capacity and environmental protection in decision making.

**Changes to make DPD sound:**
The phasing for this site should be amended to read 2016-2021 so that the sewage and sewerage issues can be resolved before development commences.

**Participate at Examination:** Yes  
**Insufficient capacity at Waste Water Treatment Works has significant implications for the environment and compliance with the Water Framework Directive. Development should not be allowed to go ahead until adequate infrastructure is in place.**
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<th>Consultation Point</th>
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<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
<td>DE1d (DE3)</td>
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<tr>
<td>Bidwells</td>
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**Comment ID:** SASub107  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

No changes; Support is expressed for the allocation.  
This allocation is justified being founded on robust and credible evidence base and it is the most appropriate strategy having been considered among other options.  
This allocation is effective in that it is deliverable, there is some flexibility built into the policy and delivery is capable of being monitored.

**Participate at Examination:** Yes  
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
Consultee: Mr Gordon Smith  
Agent: SASub146  
Consultation Point: DE1d (DE3)  

Comment ID: SASub146  
Type: E-Mail  
Attached Files:  

IS DPD Legally Compliant:  
Legal Compliance Reasons:  

Is DPD Sound: No  
Unsound because DPD NOT:  
Objection. The housing and employment policies DE1d to DE2a are fragmented, as they are without a clear mapped vision. This is necessary to tie together spatial issues and connections for a large number of fragmented present and future development sites. The commitment on page 30 to prior production of a Masterplan/developers’ brief welcomed to show disposition of land uses. But this should have been expanded to show inter-connections between all employment and housing sites in North Deeping. The relationship with the body of the town is unclear (there is no key diagram to show town structure).

Changes to make DPD sound:  
The draft Plan is promoting a new neighbourhood with commercial and housing use in close proximity, but no reference to structural landscape work, or other GI initiatives such as Linear Park alongside the Bypass or Towngate East. East-west pedestrian and cycle routes, and visual buffers should be identified.

Participate at Examination:
Consultee: Mr Gordon Smith

Comment ID: SASub148
Type: E-Mail

Is DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT:
Objection. The housing and employment policies DE1d to DE2a are fragmented, as they are without a clear mapped vision. This is necessary to tie together spatial issues and connections for a large number of fragmented present and future development sites.

Changes to make DPD sound:
West-east pedestrian and cycle routes, and visual buffers should be identified.
No reference to structural landscape work, or other GI initiatives such as Linear Park or visual buffer alongside the Bypass or Towngate East.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 26231  Mr D Bainbridge
Agent: Bidwells
Consultation Point: DE2b (DE3)

Comment ID: SASub111
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT: Effective

Policy DE2 states that 6 hectares of land under Policy DE2b (DE3).
This is not consistent with Policy DE3 which states that up to 6 hectares of land for a range of different employment uses.
Policy DE2 states B1 and B2 uses under Policy DE2b (DE3).
This is not consistent with Policy DE3 which states up to 6 hectares of land for a range of different employment uses.
For Policy DE2b (DE3) to be justified, in particular for it to be deliverable ad flexible it is requested that the Policy DE3 statements are most appropriate and these should be found within Policy DE2b.

Changes to make DPD sound:
Under 'Area' for DE2b (DE3) it is requested that the following is inserted and the existing text omitted: Up to 6 hectares.
Under 'Proposed Use' for DE2b (DE3) it is requested that the following is inserted and the existing text omitted: B1, B2 and B8 uses.

Participate at Examination: Yes
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>474396</td>
<td>Mr Gordon Smith</td>
<td>DE2b (DE3)</td>
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**Comment ID:** SASub147  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:**

Objection. The housing and employment policies DE1d to& DE2a are fragmented, as they are without a clear mapped vision. This is necessary to tie together spatial issues and connections for a large number of fragmented present and future development sites.

The commitment on page 30 to prior production of a Masterplan/developers’ brief welcomed to show disposition of land uses. But this should have been expanded to show inter-connections between all employment and housing sites in North Deeping. The relationship with the body of the town is unclear (there is no key diagram to show town structure).

**Changes to make DPD sound:**

The draft Plan is promoting a new neighbourhood with commercial and housing use in close proximity, but no reference to structural landscape work, or other GI initiatives such as Linear Park alongside the Bypass or Towngate East.

East-west pedestrian and cycle routes, and visual buffers should be identified.

**Participate at Examination:**
Consultee: Mrs J E Shield

Consultation Point: Policy DE 3: Mixed Use Urban Extension in Market Deeping

Comment ID: SASub160
Type: Letter

Legal Compliance Reasons:
Is DPD Legally Compliant: Yes

Unsound because DPD NOT:
Is DPD Sound: Yes

Changes to make DPD sound:
Re the strip of land on the east side of the main road into Market Deeping, which runs from the A15 roundabout down to the Towngate Inn on the corner of Towngate East.

My concern is what is this land development to consist of? Hopefully not a travellers site, as this is the northern gateway into Market Deeping. I hope it will represent the area in a very good way, which it deserves.

Participate at Examination:
**Consultee**
517670  Natural England
Natural England

**Consultation Point**
Policy DE 3: Mixed Use Urban Extension in Market Deeping

| Comment ID: SASub207 | Type: E-Mail | Attached Files: |

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:**  No

**Unsound because DPD NOT:**
It is NE’s opinion that the urban extensions need to demonstrate exemplary standards of design and development. These developments will shape the future of South Kesteven. This recommendation applies to the urban extensions in particular, as economies of scale mean they should be able to deliver higher standards of sustainability.

Exemplary development could include:

- GI – High quality local networks connected into the wider networks, plus a financial contribution to the strategic GI required to maintain/enhance overall sustainability;
- Energy efficiency – achievement of zero carbon in advance of the nationally set timetable;
- Renewable energy – Higher levels of renewable energy generated on-site, potentially through community-scale generation;
- Design – Where surrounding development standards are low, the design of new developments should set a new standard.

There may be the potential to ‘wrap up’ this recommendation through an overarching sustainable development policy. We would support this approach if it is deemed appropriate.

**Changes to make DPD sound:**
There may be the potential to ‘wrap up’ this recommendation through an overarching sustainable development policy. We would support this approach if it is deemed appropriate.

**Participate at Examination:**
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<tr>
<td>592461 Mr Paul Raymond</td>
<td></td>
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**Comment ID:** SASub18  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**  
I do not believe proposals in relation to DE1d (DE3) and DE2b (DE3) are suitable as they encroach on farm land and are dangerously close to the village of Langtoft. I believe it is important that all the villages and towns in the region retain their distinct identities and do not merge into each other.

**Participate at Examination:** No
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
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**Comment ID:** SASub106  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  

**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  

**Unsound because DPD NOT:**

**Changes to make DPD sound:**
No changes sought: Support is expressed for the allocation.  
This allocation is justified being founded on robust and credible evidence base and it is the most appropriate strategy having been considered among other options.  
This allocation is effective in that it is deliverable, there is some flexibility built into the policy and delivery is capable of being monitored.

**Participate at Examination:** Yes  

To participate fully in the oral examination adn to enable the Inspector to pose questions on this response.
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>605314</td>
<td>Annette Hewitson</td>
<td>Paragraph (3.4.1.4)</td>
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**Comment ID:** SASub81  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective; Consistent with National Policy

This paragraph refers to the Outline Water Cycle Study, which does not include the most up to date evidence on capacity for foul waste infrastructure. As such it fails to take account of the fact that Long Bennington has an issue with flooding in the sewer catchment downstream, which needs a strategic solution rather than a local upgrade. All development in Long Bennington may be subject to a minimum 5 year delay in order to resolve sewerage constraints. There are also issues in respect of the Waste Water Treatment Works that serve Great Gonerby, Barrowby and Harlaxton but the phasing for these sites appears to allow time for these issues to be resolved.

**Changes to make DPD sound:**

The text needs amending to reflect the findings of the Detailed Water Cycle Study, November 2011. This should be amended to read: The Detailed Water Cycle Study, November 2011, has highlighted that flooding in the sewer catchment downstream of Long Bennington needs a strategic solution rather than a local upgrade. This site may be constrained by up to 5 years. Anglian Water has stated that there is no allowance for any development in Long Bennington until the sewerage system has been upgraded. Any additional development, even small scale, will increase the risk of and be vulnerable to, sewer flooding until a strategic solution is implemented. There are also issues in respect of the Waste Water Treatment Works that serve Great Gonerby, Barrowby and Harlaxton and those promoting development in these area will need to be mindful of these issues.

**Participate at Examination:** Yes  
Insufficient capacity in the sewerage network and at Waste Water Treatment Works has significant implications for the environment and compliance with the Water Framework Directive. Development should not be allowed to go ahead until adequate infrastructure is in place.
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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**Comment ID: SASub184**

**Type: Letter**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

It is a misconceived aim to increase the size of Local Service Centres in order to allow them to continue to function as service centres or to 'maintain viability'. That logic could be used to justify towns and villages continually to develop and eventually swallow up all countryside just to maintain the existing economy. It is a flawed philosophy, and will destroy what remains of both their existing character and the open countryside around them.

**Changes to make DPD sound:**

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee        Agent        Consultation Point
443969  Mr Andy Rogers       DPD: Submission
Capita Symonds

Comment ID: SASub126
Type: E-Mail

IS DPD Legally Compliant:  Yes
Legal Compliance Reasons:
Is DPD Sound:  Yes
Unsound because DPD NOT:
Changes to make DPD sound:
comment:
Transport evidence has already been submitted to the Council in respect of an outline application for 35 units at Main Road, Long Bennington (Site Allocations Ref: LSC1f). The evidence demonstrates that the proposal would result in a less than 5% increase in traffic flows at AM and PM peak hours. In addition, the proposed access to the site has been developed in consultation with the County Council and will form part of an overall traffic calming scheme for the northern end of Long Bennington.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 443969  Mr Andy Rogers
Agent: Capita Symonds

Consultation Point: Paragraph (3.4.2.1)

Comment ID: SASub127
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
It is noted that within the wording of Core Strategy (CS) Policy SP1 preference is given to “brownfield sites” and not just the built up parts of Local Service Centres. The exclusion of this description from the paragraph suggests that the Council acknowledge that there is a severe shortage of previously developed land which could be considered appropriate for housing within the LSCs. This is reflected in the Council’s 2011 Five Year Housing Land Supply Report which concluded that of the four LSC brownfield sites without permission in the 2010 SHLAA, none were considered to be capable of being delivered between 2011-2016 (Five Year Housing Land Supply Report 2011-16, para 2.2.5).

Due to their relatively compact nature, LSC brownfield sites are almost always associated with the built up parts of a settlement. Equally, it is very rare to find available greenfield sites within these areas. This is reflected in the Site Allocations consultations where only a small proportion of the LSC sites which have been put forward are brownfield, or within the built up parts of those settlements.

A report to the Economic Development Portfolio Holder’s Report to Cabinet on 1 August 2011 highlighted the scarcity of sites within the built up parts of LSCs. The report identified a list of 34 potentially suitable and available sites within the 16 LSCs. However, of those selected sites only two (both physically connected to each other) were identified as falling within the built up part of a settlement.

The evidence therefore clearly shows that in order to provide the land required for housing in the LSCs it will be necessary for the Council to allocate appropriate greenfield sites that are on the edges of settlements.

Participate at Examination:
Consultee: Mr D Bainbridge
Agent: Bidwells

Comment ID: SASub118

Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified
Paragraph 3.4.3.1 states the following:
"The assessment concludes that some of the LSCs (Barkston, Baston, Castle Bytham, Langtoft, Morton and South Witham) are less suitable for additional planned development, whilst others could accommodate some modest growth."

The statement above is not justified because it is not the most appropriate strategy when considered against the reasonable alternatives. The most appropriate strategy is to have concluded that Baston is one of the LSC capable of accommodating some modest growth. Whist it is acknowledged that the only available, suitable and achievable housing land at Baston is Site BAST 02, this site (or more specifically the part of this site subject to EIA Screening under reference: S11/2651/EIASC/RN16) compares favourably to currently identified sites under Policy LSC1. The presence on only one developable housing site at Baston will ensure growth is modest. Larkfleet Ltd are progressing pre-application discussions and intend to prepare and submit a planning application for residential development.

It is acknowledged that the 6 no. LSC currently identified for residential development within Policy LSC1 were not objected to by the relevant Parish Council in their 2011 responses (Appendix 3 of the Evidence Document Submission Document October 2011). However, the smaller part of BAST 02 and the currently emerging proposals for development of this site (53 dwellings, up to 35% affordable housing, enhancement of public footpath, landscaping, drainage, play area and wider green infrastructure (possibly including allotments) has not been assessed and commented on by the Parish Council.
On this basis the SAP DPD should identify Baston as being suitable for additional planned development.

Changes to make DPD sound:
The SAP DPD should identify Baston as being suitable for additional planned development.

Participate at Examination: Yes
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
The assessment of LSCs capacity for accommodating new development relates to a survey undertaken to supplement the Economic Development Portfolio Holder’s Report to Cabinet on 1 August 2011 (Appendix 3). The findings of that assessment are largely supported as it is underpinned by a robust and credible evidence base which takes into account the findings of recent local studies and representations made by the local community and relevant stakeholders. Of particular note within the assessment’s findings is that only five of the 16 LSCs are given the highest ranking in terms of being “good villages with good sites”. One of those settlements is Long Bennington which the assessment records as having capacity for sewerage treatment and disposal and surface water disposal in addition to scoring well against employment opportunities and capacity of local health facilities. Whilst the assessment notes a lack of capacity in local schools serving Long Bennington it concludes that there is potential to increase capacity at the primary school through an extension to the building. The assessment also highlights that a lack of capacity is an issue experienced within the majority of the LCSs. Indeed all of the LSCs only three were identified as currently having capacity at both primary and secondary level. The outline application which is pending a decision on Site LSC1f seeks to address this issue through a proposed agreement to pay the local education authority a fee to provide enhanced educational infrastructure. Low frequency of bus routes was also identified as an issue in Long Bennington, however this was also noted at the other four high ranking LSCs where service provision is similar, if not less frequent. Furthermore, this is balanced by the comparatively high levels of service provision in the settlement, and in particular access to local employment opportunities both within the village and at the nearby Roseland Business Park. Beyond the settlement area, Long Bennington benefits from direct access onto the A1 and relatively close proximity to Grantham and Newark both of which lie no more than 10 miles away. This compares favourably to the other high ranking LSCs where average distances to the two nearest towns are greater. Committed housing figures for Long Bennington indicate that potentially another 60 dwellings could be built. However, of that total just over 75% are on sites which have been recorded in the Council’s supply for the last four monitoring years. Given this extended period of inaction and the current economic conditions there is uncertainty as to whether a significant proportion of these houses will ever be delivered. The matrix also shows that of the 60 dwellings built since 2006 only 4 affordable houses have been provided. With an identified need for 18 affordable houses
there is clearly a requirement for the Council to identify sites that are large enough to meet this need. One such site capable of assisting with this requirement is the site recommended for allocation at Main Road (Ref: LSC1f). The site is currently the subject of an outline application for 35 dwellings. If approved the proposal would make provision for 12 affordable homes, which would meet the criteria set out in Policy H3 of the Core Strategy.

Participate at Examination:
IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
support:

Page 32 of the DPD whilst identifying BASTON as an LSC states that it is less suitable for additional planned development. Page 66 goes on to say that SLIGHT EXPANSION is possible. The INHOLMES site on the southern boundary of the village is good productive farmland in constant use. The proposed development of 53 homes (greater than the earlier sites of PHASE 1 (46) and PHASE 2 (41) homes of the AVELAND ESTATE) would constitute a huge overdevelopment of the village creating a number of serious problems.

Baston has few, if any, job opportunities, the local businesses all being small scale. The PRIMARY SCHOOL is already oversubscribed and currently unable to accept any more pupils. These two factors alone will generate large volumes of commuter/school run traffic at what are already recognised a very busy periods of the day. Should the proposal go ahead, and bearing in mind that HIGHWAYS have said the site has no suitable access, the layby junction being unacceptable, then the only option for traffic to exit the site would appear to be via Chesham Drive/Aveland Way - a tortuous rather narrow road unsuited to greater volumes of traffic than it currently serves.

The SA/SEA report states there will be a NEGATIVE IMPACT as it does not reduce the need to travel by car. SKDC itself states travel to work by car is nearly 80% of employment related travel, a higher proportion than in England as a whole, thus highlighting the scarcity of public transport. Public transport accounts for less than 5% of work journeys.

Participate at Examination:
Changes to make DPD sound:

In the current economic climate it is essential that the Council allocates a wide range of sites of different sizes and in different locations to guarantee that sufficient land is brought forward for development at an early stage in the LDF period. It is argued that selection of several of the sites identified for allocation is not founded on a robust and credible evidence base. As a result it is argued that the DPD fails the 'Test(s) of Soundness' as it is not 'Justified'. Greater preference should be given to directing growth to the Local Service Centres. A range of development sites should be allocated in these Local Service Centres which includes greenfield sites that are well related to the settlement. It is recognised that the majority of growth should be directed towards Grantham and the three market towns of Stamford, Bourne and the Deepings, however, appropriate levels of growth that maintains the vitality of Local Service Centres is important. These villages benefit from a wide range of services and facilities as set out in the South Kesteven Core Strategy and include primary schools, food shops, a village hall, a church, a Post Office, recreational space, employment areas and a mobile library. The most sustainable Local Service Centres also have regular bus services to nearby urban areas, doctor’s surgeries and secondary schools.

Para. 3.2.6 states that ‘Development is being directed towards the Local Service Centres to enable them to remain sustainable communities. That sustainability could be undermined if those services and facilities are lost, as the loss of essential services can have adverse consequences in the form of unsustainable travel patterns. Such losses will not be supported unless alternative facilities exist (or can be provided) to meet local needs at an equally accessible location, or all options for continued use have been fully explored and it can be demonstrated that this would be economically unviable.’

The Evidence Report to the Site Allocations document describes Billingborough as follows, ‘Because of its more remote location, it is quite self contained, providing shops, employment opportunities, secondary and primary schools and medical facilities.’ Modest development will therefore be essential to the continued viability of these services and facilities in Billingborough. The lack of an allocated site for housing is concerning. The Aveland Secondary School on Birthorpe Road is due to close at the end of the 2011/2012 academic year. Whilst the Parish Council has stated a preference for this site to come forward for residential development, there is no guarantee that this will happen. It is considered inappropriate to rule out allocation of a site in Billingborough on the basis that the school site may come forward for development in the future.

The Council has, therefore, accordingly made choices about which sites are the very best option for delivering some local housing in the villages it believes are best able to accommodate the growth and only a few sites have been allocated. It is argued that due to the above preference to gamble on a site coming forward...
Site Allocation DPD: Submission October 2011 - Consultee Comments

For development the best sites have not been selected. For example Hurn Farmyard in Billingborough (Ref. BIL/09) can be incorporated into the existing built environment utilising many of the services already in place. The area is served by public transport and within walking distance of community services and facilities and local schools. The site is in agricultural use with a number of modern farm buildings. It is felt that an extension to the built environment in this direction would be logical for the future growth of Billingborough creating a rounding off of the settlement between Black Miles and White Leather Square. The site benefits from mature boundaries with the eastern boundary of the site identified by hedges and tress along the edge of the field. As a result development at this site would be highly self-contained within the wider landscape.

SLR Consulting Limited (SLR) were appointed to prepare a Transport Statement on behalf of The Crown Estate in support of BIL/09. It was prepared as a response to the conclusions made in the SHLAA which highlighted access as a constraint to development. The assessment undertook an audit of the existing conditions affecting the site and its setting. The assessment concluded that the site location is one that would support a residential development of the type and nature proposed. The location of the site and local transport services available are such that future residents would have a choice of travel modes for trips to shopping, work and leisure purposes.

Furthermore, suitable access by all modes is available to the site and the nature of the approach roads between the site and the principal highway network is such that the additional traffic associated with the development can be accommodated accordingly, if necessary with upgrading in places. It also concluded that Low Street was operating below its operational capacity at all times and that a suitable access can be provided through garden land to the side of numbers 13 and 15 Low Street, which are also in the ownership of The Crown Estate.

Another site submitted for consideration was land between Pointon Road and Birthorpe Road (Ref. BIL04). This site is also in a sustainable location being accessible in terms of public transport and key facilities within the settlement. It is located directly adjacent to Aveland High School and could be allocated in whole or in part for development as a first phase with the school site forming the second phase once sold.

These two sites offer excellent opportunities to allocate a sustainable housing site in Billingborough. Other sites submitted for consideration including BIL10, BIL11, BIL12 and BIL 13 should also not be ruled out. Allocating sites in a sustainable settlements such as Billingborough would demonstrate that the DPD is founded on a robust and credible evidence base enabling the Development Plan to be effectively delivered.

Participate at Examination: No
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<th>Consultation Point</th>
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<tr>
<td>443969 Mr Andy Rogers</td>
<td>Capita Symonds</td>
<td>Paragraph (3.4.4.2)</td>
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**Comment ID:** SASub129

**Type:** E-Mail

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Consistent with National Policy

**Changes to make DPD sound:**

The Council’s latest Five Year Housing Land Supply Report for the period 2011 – 2016 concludes that based on an annual average residual requirement of 3250 dwellings over this period, there is currently a shortfall in deliverable supply of 651, equating to a 4 year supply of housing. The recommended allocated sites in the consultation document will assist in improving this situation by providing land for approximately 185 dwellings in the LSCs. Taking into account the number of completions since 2006 (635) and existing commitments (300) the total supply would be 1120, equivalent to a 12% increase on the CS allocation for LSCs. However, advice contained within the National Planning Policy Framework states that in order to boost the supply of housing, local planning authorities should include “…an additional allowance of at least 20 per cent to ensure choice and competition in the market for land” (Para 109). On the basis of the above we would recommend that the Council seeks to make further allocations in addition to those already selected within the LSCs.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee 590493  Mr Daniel Hewett
The Crown Estate

Agent 150520  Mr Daniel Hewett
Carter Jonas Llp

Consultation Point
Paragraph (3.4.4.2)

Comment ID: SASub5
Type: Web
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Justified

Changes to make DPD sound:
More growth should be directed towards the Local Service Centres which benefit from adequate levels of service provision to facilitate additional growth. This will give the Council a better chance of meeting their housing targets. The ability for the urban extensions to be delivered within the early stages of the plan period is brought into question when the nationwide delays in housebuilding are considered. It is therefore considered that the distribution of growth is not founded on a robust and credible evidence base. As a result it is argued that the DPD fails the 'Test(s) of Soundness' as it is not 'Justified'.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
443969 Mr Andy Rogers
Capita Symonds

Agent

Consultation Point
Paragraph (3.4.5.3)

Comment ID: SASub130
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
To ensure that the Council satisfies the provisions of PPS3 the DPD has set out a strategy for phasing the delivery of the proposed housing sites. In terms of the LSCs we support the Council’s recommendation to include LSC1f in the first phase of delivery.
The pending outline application on the site has gathered a substantial body of evidence that there are no significant physical constraints that would prevent a housing development of upto 35 dwellings being delivered within the first five years. The research undertaken has concluded that the site is not at risk of flooding, can deliver an access which provides adequate visibility and also assists with a wider strategy to reduce the speed of traffic, and will have limited impact upon landscape character and species habitat.
This evidence is supplemented by the conclusions of Part I of the Water Cycle Study (2011) which places LSC1f (LB02a) as the top ranking LSC housing site recommended for allocation in terms of the lack of flood risk or wastewater constraints to development (Table 3.10).

Participate at Examination:
Levels of affordable housing construction within the District since 2006 have fallen well short of the target set in the Strategic Housing Market Assessment (SHMA) 2010. Estimations in the SHMA conclude that 667 additional units of affordable housing per annum would be required if all needs were to be met (Para 6.3). This compares to the 190 affordable houses that were completed in the last recorded monitoring year of 2009-10. Whilst it is accepted that such a target is unachievable this completion rate still falls some way short of the figure established in the Core Strategy of 238 affordable homes per annum.

The Assessment of Village Capacity matrix attached to the August 2011 Cabinet Report highlights the level of affordable housing need within the LSCs upto the end of the last monitoring year. The figures show that the settlement with the greatest identified need for affordable housing (18 units) is Long Bennington. Despite it being one of the highest ranking LSCs in terms of service and infrastructure capacity, Long Bennington also has one of the lowest completion/committed totals for affordable housing, with only 4 units having been built since 2006.

The identified level of local need for affordable housing was acknowledged by an Inspector in a recent appeal decision in the settlement (Ref:APP/E2530/A/10/2136247), however the proposal was dismissed on grounds on grounds relating to noise and a failure to integrate the proposal with the existing community.

Based on the above evidence it is our opinion that there is a clear and demonstrable need for the DPD to prioritise the allocation of a site in Long Bennington which makes a significant contribution towards addressing the shortfall in affordable housing in the settlement. Support is given to allocating the recommended site LSC1f where evidence has already been provided to the Council to demonstrate that the site is capable of providing upto 12 affordable homes within a market led scheme, where house types and tenures would be mixed throughout the site. It should also be noted that due to the lack of site constraints the affordable housing could be delivered within the next five years.

Participate at Examination:
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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</thead>
<tbody>
<tr>
<td>26106 Mrs J Shaw</td>
<td>25979 Mr M Herbert Brown &amp; Co</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub209  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**IS DPD Sound:** No  
**Unsound because DPD NOT:** Effective

Because land which has been forward before for a limited housing site has not been put forward in the DPD document. This is a site at Billingborough which is Site SK/BIL/03. This is adjacent to Pointon Road and to the south of Brewery Lane. The number of sites proposed in Policy LSC1 is restrictive in view of the need to provide the minimum target set through the RSS and Core Strategy documentation. Greater flexibility and opportunities should be provided in all of the Local Service Centres. At the moment the list is restrictive and does not include any sites at Billingborough which is a Local Service Centre. The site proposed has been previously used as garden land and is not an extrusion into open countryside. It is not proposed that there will be an intensive development on this site. We believe it has been omitted in favour of other sites for accessibility issues. For a small scale development would, we believe, provide a worthwhile opportunity for limited growth in this Local Service Centre consistent with other Plan Policies. The focus through LSC1 is for most developments to be in the LSC's surrounding Grantham where there is already significant growth because of its Growth Status. We feel it is important not to reinforce the urbanisation and inevitable commuting to Grantham from some LSC's in favour of restricting self supporting LSC's which need growth to preserve and enhance local facilities. There must be a greater spread of diversity and opportunity in the housing stock to facilitate fundamental policies through the Core Strategy documentation. Some of the other sites proposed will result in unacceptable significant extensions to the built form of the villages in question whereas the site proposed at Billingborough will have a much lesser effect and will give a greater diversity. In particular we would draw your attention to the sites reference:

LSC1(D) - there is already significant development nearby in Grantham and this site is very distant to the key services/facilities within the village.  
LSC1(A) - as above - this is clearly an extension into open countryside away from the significant built form in Barrowby.  
LSC1(E) - again, this is greenfield land and is an extension to Harlaxton village away from the major built form of the village.  
LSC1(C) - this is the site at Corby Glen. There is no other housing in close proximity. It adjoins a school and playing field and would look unacceptable in the landscape as it is clearly a major intrusion into an open area.

**Changes to make DPD sound:**
The inclusion of the site at Billingborough to either supplement or replace other less suitable sites in Policy LSC1.

**Participate at Examination:** Yes  
Depending on responses by others we would like to reserve our position on this issue. If others are actively promoting the LSC distribution and growth levels we may be happy to join with others and to deal with the site specific issues by further written representations at the Pre Inquiry stage.
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>372869  Mr and Mrs Geoff Hix</td>
<td>372868 Robert Doughty RDC</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
</tbody>
</table>

Comment ID: SASub137
Type: E-Mail
Attached Files: SASub137 and 138.pdf

IS DPD Legally Compliant: Yes
Is DPD Sound: No

Unsound because DPD NOT: Justified
The DPD fails to allocate land in Castle Bytham despite finding that land is suitable for development through the evaluation of SHLAA sites (notably DPD site reference CAS06 SHLAA site reference SK/CAS/04). In addition, other land under the control of the objector (DPD site reference CAS07 and CAS08) should also be considered for allocation to enable the LSC of Castle Bytham to develop.

Changes to make DPD sound:
Sites CAS06, CAS07 and CAS08 should be included as housing allocations in Policy LSC1.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 606978  Mr Robert Jenkinson
Agent: 26002  Escritt Barrell Golding

Consultation Point: Policy LSC 1: Housing Allocations in the Local Service Centres

Comment ID: SASub120
Type: Letter

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT:
Highway constraints appear to be the main reason for not allocating this Land. Our client has purchased additional frontage land since submitting the proposal. We are at a loss to understand how development here would have any significant impact on the Belton Estate.

Changes to make DPD sound:
We propose inclusion of GGON07. A sympathetic low density landscaped scheme could be designed to preserve the separation between Grantham and Great Gonerby whilst providing public access (which does not currently exist) to an attractive area of countryside.

Participate at Examination: No
## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>606978 Mr Robert Jenkinson</td>
<td>26002 Escritt Barrell Golding</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
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**Comment ID:** SASub119  
**Type:** Letter  
**Attached Files:**

### IS DPD Legally Compliant:

#### Legal Compliance Reasons:

**Is DPD Sound:** No

**Unsound because DPD NOT:** Justified

The conclusion for not including site reference GGON02 pt OS 0006 states that there are no suitable access points. Planning permission for affordable housing has recently been approved on the adjoining land to the south (site reference GGON03). The approved scheme includes provision for access to GFON02. It would also be possible by incorporating the adjoining area of land - ADD16 to construct a new access onto the B1174 not only to serve the site but also to improve the junction with Belton Lane.

The Assessment Constraints refer to a sewer crossing the site which neither we or our client are aware of - if it exists this would appear to be a benefit! Rainwater discharge would not be an insurmountable problem as the site is on Limestone. A drainage scheme incorporating water harvesting, soakaways and some discharge to the Toll Bar Drain to the north could be designed.

A Public Footpath crossing ADD 16 would remain.

### Changes to make DPD sound:

We propose inclusion of GGON02 and ADD16. A well designed scheme on this land would enhance the visual character of the village and it would have the potential to deliver significant highway improvements.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tbody>
<tr>
<td>26121 Mr D Fabris</td>
<td>372868</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
<tr>
<td>Mouchel Business Services Limited</td>
<td>RDC</td>
<td></td>
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**Comment ID:** SASub135  
**Type:** E-Mail  
**Attached Files:** SASub135 and 136[1].pdf; SASub135 and 136[2].pdf

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**  

**Is DPD Sound:** No  
**Unsound because DPD NOT:**  
The DPD fails to allocate the site of the Aveland High School in Billingborough. The reasons as to why the land should be allocated are set out in the accompanying representation document.

**Changes to make DPD sound:**  
The Aveland High School site, identified on the plan that accompanies the Representation, should be allocated for housing on the Billingborough Inset Map and included as such as part of Policy LSC1.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<th>Consultation Point</th>
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<tr>
<td>26279</td>
<td>Mr Richard Edwards</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
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<tr>
<td>Larkfleet Group</td>
<td></td>
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**Comment ID:** SASub191  
**Type:** E-Mail  
**Attached Files:**

| IS DPD Legally Compliant: | Yes  
| Legal Compliance Reasons: |  
| Is DPD Sound: | No  
| Unsound because DPD NOT: | Justified  

These objections relate to the absence of a proposed allocation for our land interests in Morton, identified as ADD28 and well known to the Council. The site extends to circa 3.5 acres and is located immediately to the west of the A15. Part of the site already benefits from an extant planning permission for 20 units of affordable housing.

All of the proposed sites identified at the LSC are greenfield and located on the edge of their respective settlements and therefore comprise some encroachment into open countryside.

Site LSC1a at Barrowby is in an especially exposed location with only development on the east side. The site is not accessible to the centre of the village. There is support by the Parish Council, who is the landowner, and therefore the practical means of delivering the site for development has to be questioned. In addition, given its location the attractiveness of this site to developers and housebuilders is highly questionable.

Site LSC1c at Corby Glen is in an even more exposed and prominent location with only building on the opposite (west) side of the road. This is the changing rooms for the sports ground and hence the nearest existing residential is remote from the site being further north along Swinstead Road. The additional community benefit stated for this site is the provision of a pedestrian and cycle link to Bourne Road (A151), however the proposed site allocation does not include sufficient land to make this physical connection and even if it did there is little benefit in the connection due to the remoteness of the site. If the connection is capable of being made then this would appear likely to connect to the south of the fire station on Bourne Road. This will require extension of the 30 mph speed limit which does not appear to have been assessed. The policy does not state provision of a pedestrian and cycle link from the site along Swinstead Road northwards which must be a requirement given that the existing footway along the east side of the carriageway does not extend along the frontage of the site and it is currently sub-standard. In addition, the site frontage to Swinstead Road is partially within national speed limit and hence access details should be considered.

Site LSC1d at Great Gonerby is also visually prominent with a pronounced slope downwards from west of the site towards the south east corner. Site ADD28 is located on the western side of Bourne Road abutting existing residential properties to the north and east. The site is approximately 3.5 acres in size and has a capacity for circa 50 dwellings (20 of which are already consented).

The identification of the villages and the site locations within Policy LSC1 is not justified because it is not the most appropriate strategy when considered against the reasonable alternatives.

The most appropriate strategy is to identify site ADD28 accessed off Bourne Road for residential development of circa 50 dwellings (20 of which are already consented).
Site Allocation DPD: Submission October 2011 - Consultee Comments

consented), including up to 35% affordable housing.
Three of the site currently identified for residential development under Policy LSC1 appear to have been selected in part or mostly on the basis of additional benefits to the local community beyond the provision of up to 35 affordable housing on-site and open space/play provision.
Policy LSC1 does not require or guarantee delivery of the additional benefits to the local community. If the Council considers these additional benefits outweigh some or all of the constraints/concerns about residential development on these sites then policy should make it clear exactly how and when the additional benefits will be delivered relative to delivery of the residential development.

Changes to make DPD sound:
Assess and then identify part of Site ADD28 accessed off Bourne Road for residential development of circa 50 dwellings (of which 20 are already consented), including up to 35% affordable housing. Undertake this and further consultation prior to submission of the SAP DPD.
Reassess and then consult on any changes to the currently identified sites for residential development under Policy LSC1 prior to submission of the SAP DPD.
Reassess and then consult on the means by way to secure additional benefit to the local community from any remaining of the currently identified sites under Policy LSC1 prior to submission of the SAP DPD.

Participate at Examination: Yes
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
Policy LSC 1 identifies 6 no. site locations for allocations at 6 of the LSC. 

These objections relate to the absence of a proposed allocation for our land interests in Long Bennington, identified as part of SK/LON/10 and well known to the Council (under planning application ref: S09/1233). This site was subject of a planning appeal but this decision was ultimately quashed as being unsound. The site extends to 2 acres and forms a natural rounding off of development fronting Costa Row to the south and east and Valley Lane to the north. 

All of the proposed sites identified at the LSC are greenfield and located on the edge of their respective settlements and therefore comprise some encroachment into open countryside.

Site LSC1a at Barrowby is in an especially exposed location with only development on the east side. The site is not accessible to the centre of the village. There is support by the Parish Council, who is the landowner, and therefore the practical means of delivering the site for development has to be questioned. In addition, given its location the attractiveness of this site to developers and housebuilders is highly questionable.

Site LSC1c at Corby Glen is in an even more exposed and prominent location with only building on the opposite (west) side of the road. This is the changing rooms for the sports ground and hence the nearest existing residential is remote from the site being further north along Swinstead Road. The additional community benefit stated for this site is the provision of a pedestrian and cycle link to Bourne Road (A151), however the proposed site allocation does not include sufficient land to make this physical connection and even if it did there is little benefit in the connection due to the remoteness of the site. If the connection is capable of being made then this would appear likely to connect to the south of the fire station on Bourne Road. This will require extension of the 30 mph speed limit which does not appear to have been assessed. The policy does not state provision of a pedestrian and cycle link from the site along Swinstead Road northwards which must be a requirement given that the existing footway along the east side of the carriageway does not extend along the frontage of the site and it is currently sub-standard. In addition, the site frontage to Swinstead Road is partially within national speed limit and hence access details should be considered.

Site LSC1d at Great Gonerby is also visually prominent with a pronounced slope downwards from west of the site towards the south east corner.

Part site LON/10 is located on the southern side of Valley Lane opposite existing medical practice to the north. There are residential properties located to the east and the A1 trunk road is situated to the west. The land slopes from east to west and is currently in agricultural use. The site is approximately 2 acres in size and has a capacity for circa 30 dwellings.

The only identified constraint to this site is the need to mitigate possible noise issues that could affect part of the site. Consultant noise engineers have carried out
extensive monitoring of the site and the necessary levels of attenuation can be achieved to mitigate the levels of noise down to the appropriate NEC noise category. This can be achieved using a combination of an acoustic bund to the west of the site and specific layout and design of the scheme.

The identification of the villages and the site locations within Policy LSC1 is not justified because it is not the most appropriate strategy when considered against the reasonable alternatives.

The most appropriate strategy is to identify part of Site LON/10 accessed off Valley Lane for residential development of circa 30 dwellings, including up to 35% affordable housing.

Part site LON/10 is considered to perform better within the assessment work than some of the other sites identified for residential development in the SAP DPD. Three of the site currently identified for residential development under Policy LSC1 appear to have been selected in part or mostly on the basis of additional benefits to the local community beyond the provision of up to 35 affordable housing on-site and open space/play provision.

Policy LSC1 does not require or guarantee delivery of the additional benefits to the local community. If the Council considers these additional benefits outweigh some or all of the constraints/concerns about residential development on these sites then policy should make it clear exactly how and when the additional benefits will be delivered relative to delivery of the residential development.

**Changes to make DPD sound:**
Assess and then identify part of Site LON/10 accessed off Valley Lane for residential development of circa 30 dwellings, including up to 35% affordable housing.

Undertake this and further consultation prior to submission of the SAP DPD.

Reassess and then consult on any changes to the currently identified sites for residential development under Policy LSC1 prior to submission of the SAP DPD.

Reassess and then consult on the means by way to secure additional benefit to the local community from any remaining of the currently identified sites under Policy LSC1 prior to submission of the SAP DPD.

**Participate at Examination:** Yes

To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
I wish to confirm my previous comments regarding developments in Ancaster. I agree to a point with your planning department that further development shouldn’t be allowed, although you give a proviso that if necessary 40 houses could be built at the top of St. Martin’s Way. 40 houses is a significant number on a plot of only 2.5 acres. The increased traffic flow down a relatively steep hill (ungritted in the winter) on to a busy through road with a large garage close by often with vehicles which can restrict visibility to the north is likely to substantially increase the risk of an accident. The extra damage to the roads means greater cost of repairs (if ever carried out) and even more congestion on our already overcrowded roads, since most people commute to the main towns. The utilities would be put under greater pressure and many services would be unable to cope with an increased population.

An important, although oft ignored issue is the aesthetics of the village. Building houses (or even bungalows) on the outskirts of Ancaster on a hill overlooking the village will detract from the village, being unpleasant to villagers and visitors alike. Building on land near Pottergate or on land east of Ermine St. would be more acceptable, although I believe that at least one land owner is waiting for prices to rise before submitting a planning application. Perhaps compulsory purchase powers could be used!

At the present time the expansion of numerous villages and formation of new large scale developments, often without the presence of any services, results in loss of agricultural land and the destruction of the environment. The only winners are the get rich quick land owners/developers. Development within towns/cities is more acceptable particularly where brownfield sites can be used. A good infrastructure should in any event be present and this should keep pace with the increased population. This should be more cost effective and much ‘greener’ than the present method of population management,
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26339 Mrs P Buttery</td>
<td>Billingborough Parish Council</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub175  
**Type:** Letter  
**Attached Files:** Billingborough PC.pdf; Billingborough PC - App A.pdf; Billingborough PC - App B.pdf; Billingborough PC - App C.pdf; Billingborough PC - App D.pdf

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified  

As a formal response to the first consultation on the DPD in November 2009, following a workshop with parish councillors, BPC stated that "It now seems certain that the Aveland Secondary School will close around 2012 and that its buildings or site will not be required for educational purposes. It would therefore seem sensible to allocate the brownfield school site for housing development within the Development Plan period thus avoiding the need to develop agricultural land on site BIL04 or elsewhere within the village."

SKDC Cabinet report of 1 August 2011 stated that:

"Billingborough is identified as a village which could support a modest development, the parish council supports this view but are concerned that as it has now been confirmed that the Aveland Secondary School on Birthorpe Road will close at the end of the 2011/12 academic year consideration should be given to the allocation of this site for housing and community facilities including open space. Lincolnshire County Council have just confirmed that the school will close and the site will therefore be available for development. The site is brownfield and is considered suitable for redevelopment, however, it has not been subject to public consultation or the full site assessment process, therefore allocating the site in the Submission plan may cause legal problems for the plan. A planning application for the redevelopment of the site would be considered acceptable under the Core Strategy policy framework. The preference for this council and the parish council would be for the redevelopment of this site rather than a Greenfield alternative. It is therefore recommended that no site is allocated in this plan in Billingborough.

It is clear that all parties are in favour of earmarking the Aveland School site for a small housing development together with village recreational land for allotments and a playing pitch. The only reason why an allocation to this effect has not been made in the DPD is that SKDC considered that the site had not been subject to public consultation and that this had been the case due to a misunderstanding about its availability. [see attachment for further information]

**Changes to make DPD sound:**

We now request the Inspector to rectify this situation by allocating the site in the final plan. It would of course be possible to achieve development by submitting an application despite the DPD but this would make a mockery of the DPD process and its non allocation could lay open the possibility that other site owners might advocate their far less sustainable sites to the Inspector. Please note however that the BPC would only wish the site to be allocated if the area for residential
development is confined to the school buildings footprint (1.5ha) and that at the same time the remaining open part of the site (2.5ha) is allocated for public recreational use in the form of a football pitch and allotments.

Suggested change is:

LSC1g: Aveland School Site, Billingborough, 20 houses, 7 affordable houses, 2011-2016 phase.
LSC1g: Aveland School Site, Billingborough, Provision of land for a minimum of 1ha of allotments and a full size football pitch.

**Participate at Examination:** Yes

So that the voice of the Parish Council can be fully heard and in case of objectors appearing on account of other omitted sites (possible withdrawal of participation later).
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<tbody>
<tr>
<td>26205 Dr D Burston</td>
<td>25997 Mr P Frampton</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub210  
**Type:** Letter  
**Attached Files:** SASub210.pdf

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**  
**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective

The SADPD only identifies a minor number of site within Local Service Centres (LSC). Castle Bytham is identified as one of sixteen LSCs in the Core Strategy. Yet the SADPD only identifies 6 sites within these LSCs as development sites. Notwithstanding that the majority of the identified development for SKDC is to come forward within Grantham and other major settlements it appears inconsistent to firstly identify a number of LSCs described in the adopted Core Strategy as providing a "range of community services similar to those found within a small town. Future appropriate development is considered necessary within these settlements to maintain their role as service providers for the surrounding smaller villages." Then limit the identification of areas deemed suitable for development within these areas to a handful of sites.

The SADPD contains no justification for the identification of such a limited number of sites and fails to explain why so many LSCs, including Castle Bytham are absent of any allocations, particularly in the light of the Core Strategy's identification of LSCs as service providers for both the immediate village and surrounding smaller villages. In allocating a small number of sites for development the SADPD is neither flexible nor effective as a DPD. Should some of the sites fail to come through and be delivered the SADPD does not demonstrate any form of contingency with regard to the delivery of housing in other sites within the identified LSCs.

With regard to the specific non-allocation of The Old Quarry Site it is clear that the LPA have not had full regard to the specific considerations material to the site's development. Namely:

- the planning history of the site
- the extant permissions ranging from industrial development to residential development
- the opportunity to introduce a management regime for the SSSI (which none of the extant permissions have)
- the identified scale of development
- the identified alternative nature of the development that would incorporate

PPS3 states that LPAs should provide a variety and range of housing and that "everyone has the opportunity of living in a decent home". Furthermore it goes on to state at Paragraph 9 that LPAs should deliver housing that will "ensure(s) high quality housing for those ... who are vulnerable and in need" and "to include sustainable, inclusive, mixed communities in all areas, both urban and rural".

The SADPD fails to identify any specific housing for the elderly or those requiring care and is therefore considered to be inconsistent with national policy.
Changes to make DPD sound:
It is requested that land at The Old Quarry be identified as a site, within the SADPD, suitable to come forward for a development of a continuing care retirement community, incorporating a 75 bed nursing home, a 75 bed dementia unit, a community health centre, 48 independent living units and 28 close care apartments.

Participate at Examination: Yes
The merits of allocating the site need to be fully examined.
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>405422 Mr Eaton</td>
<td>26011 Mr Mike Sibthorp</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
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**Comment ID:** SASub101  
**Type:** Letter  
**Attached Files:** SASub101.pdf

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective

The DPD should take account of the Draft NPPF, in particular paragraph 109. This states that ... identify and maintain a rolling supply of specific deliverable sites. This supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land. There is no such provision within the DPD, and this must therefore go to the overall soundness of the plan. Additional provision could enable a wider spread of provision across all the Local Service Centres in the District, including Great Gonerby.

**Changes to make DPD sound:**

My client requests the inclusion of part of site GGONS as a site for residential development under the provisions of Policy LSC1. [map and details attached]

**Participate at Examination:** Yes

The respondent wishes to make representations upon the process leading to the identification of preferred site and the relative merits of the identified sites in Great Gonerby.
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>490730 Mr Alan Hubbard</td>
<td></td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
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#### Comment ID: SASub217
- **Type:** E-Mail
- **Attached Files:**

#### IS DPD Legally Compliant: Yes
#### Legal Compliance Reasons:

#### Is DPD Sound: No
#### Unsound because DPD NOT: Justified; Effective; Consistent with National Policy

#### Changes to make DPD sound:
A: Add a new paragraph into the Policy after the first table as follows:
"Proposals for Sites LSC1a and LSC1d shall not exceed two storeys in height, roof materials should be recessive in colour and appropriate native screen planting shall be introduced along the eastern edge of Site LSC1d to mitigate the impacts of development upon the wider setting of Belton."

B: Delete the additional allocation of land at Colsterworth i.e Site LSC1b. (However, if some additional allocation is made at Colsterworth then the number of units and in particular the size of the site to be allocated should be reduced to exclude the higher land to the north and east of site LSC1b).

#### Participate at Examination: Yes

The proposed development of site LSC1b is in part in a prominent location where it would adversely impact upon the wider setting of Woolsthorpe Manor the birthplace of Sir Isaac Newton and where he undertook much of his most important scientific work during the plague years. Development would adversely impact upon this internationally important tourist attraction that the Trust is required to look after permanently for the nation. The rationale behind the allocation in principle and in detail is unclear from the Evidence document that the Site Allocations DPD is based upon.
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>419273 Mr A Blankley</td>
<td>26011 Mr Mike Sibthorp</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub104  
**Type:** Letter  
**Attached Files:** SASub104.pdf

**IS DPD Legally Compliant:** Yes  
**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective; Consistent with National Policy

No sites have been allocated for residential development in Ancaster. Having regard to the scale of the settlement, and the diversity of services available, it is considered that the village is an appropriate location for some additional residential development.

The DPD should take account of the Draff NPPF, in particular paragraph 109. This supply should include an additional allowance of at least 20% to ensure choice and competition in the market for land. There is no such provision within the DPD, and this must therefore go to the overall soundness of the plan. Additional provision could enable a wider spread of provision across all the Local Service Centres in the District, including Ancaster.

**Changes to make DPD sound:**

My client requests the inclusion of site ADD2 (Ant House Farm) as a site for residential development under the provisions of Policy LSC1. IF the site is not considered suitable for residential development, it is considered, based upon the contents of the Evidence Document that the site should be allocated for employment development.

**Participate at Examination:** Yes

The respondent wishes to make representations upon the process leading to the identification of preferred site and the relative merits of the identified sites in Ancaster.
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
<th>Agent</th>
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<tr>
<td>590493 Mr Daniel Hewett</td>
<td>150520 Mr Daniel Hewett</td>
<td>LSC1 a</td>
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<tr>
<td>The Crown Estate</td>
<td>Carter Jonas Llp</td>
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</tbody>
</table>

Comment ID: SASub10  
Type: Web  
Attached Files:

IS DPD Legally Compliant:  Yes  
Legal Compliance Reasons:  
Is DPD Sound:  No  
Unsound because DPD NOT:  Justified  
Changes to make DPD sound:  
The Village Capacity Assessment which forms part of the Evidence Base for the Site Allocations DPD found that the Primary School is at capacity. This combined with the fact that the site is some distance from village facilities it is believed that selection of this site for allocation is not founded on a robust and credible evidence base. More sustainable sites have been put forward in Billingborough and as a result it is argued that the DPD fails the 'Test(s) of Soundness' as it is not 'Justified'.  
Participate at Examination:  No
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<th>Consultee</th>
<th>Agent</th>
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<tr>
<td>497567  Mr Andrew Russell-Wilks</td>
<td>Ancer Spa Midlands Ltd</td>
<td>LSC1b</td>
</tr>
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</table>

**Comment ID:** SASub133  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We consider the DPD to be sound and these comments are in support of the DPD. The inclusion of site LSC1b is welcomed and forms a logical extension to the settlement.

Our client owns approximately 50% of the site at Bridge End Colsterworth under reference LSC1b.

The site currently consists of two parcels of land in separate control. The site is readily available for development and both land owners wish it to come forward for development. The promoters of the 2 parcels are working together to deliver a comprehensive development in accordance with the aspirations of the DPD to provide 40 residential properties and a small local retail facility to serve the wider needs of the community. It must be stated that suggested yield of 40 dwellings is not derived from any physical barriers or delineation on the site and is an arbitrary number to suit the needs of the strategy. Additional land is available for modest increase to this number and Council needs to ensure that there is sufficient flexibility on the policy to allow for additional development to deliver the overall aims of the Core Strategy. Indeed, it may be necessary to consider modest increase in the capacity of this site to create the necessary economies of scale to facilitate the local retail facility.

We have carried out preliminary investigations into the deliverability of the site. These include foul and storm water drainage, highways and access issues and utilities. This research has confirmed the conclusions in the DPD that this site has no conflict with the Outline Water Cycle Study and have all been ‘ticked off’ in principle by the Highways Authority. The suggestion that site LSC1b should not be brought forward until 2016-21 appears arbitrary. There appears to be is no real planning basis for this approach and the proposed phasing does not appear to spread the development equitably over the plan period (the majority coming in the middle 5 years). These is no technical or legal impediment to bringing this site forward in the short term. The Council is not proposing any additional allocations within Colsterworth that could be considered to be prejudiced by bringing LSC1b forward in the plan period and as such it is suggested that consideration should be given to bringing this site into the first five year period or the deletion of the proposed phasing regime as this is already dealt with in the Core Strategy.

Additionally, South Kesteven’s Housing Land Supply appears to only amount to about 4 years. With this in mind the guidance in PPS3 and the policies contained with the development plan are clear. Measures should be put in place to rectify the situation and this may not be achieved by allocating land in the medium to long term. Indeed the draft NPPF is suggesting that LPA’s make allowance for an 20% of deliverable sites and this would clearly exacerbate the situation even
Site Allocation DPD: Submission October 2011 - Consultee Comments

further.

**Participate at Examination:** Yes
To ensure that the inspector is fully aware of the deliverability of this site and to address the timing issue highlighted above.
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<th>Consultee</th>
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<tr>
<td>26279 Mr Richard Edwards</td>
<td>Larkfleet Group</td>
<td>LSC1b</td>
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</table>

**Comment ID:** SASub123  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We consider the policy relating to LSC1 to be sound in principle and these comments are in support of the DPD. The inclusion of site LSC1b is welcomed and forms a logical extension to the settlement.

The site currently consists of two parcels of land in separate control. The site is readily available for development and both land owners wish it to come forward for development. The promoters of the 2 parcels are working together to deliver a comprehensive development in accordance with the aspirations of the DPD to provide 40 residential properties and a small local retail facility to serve the wider needs of the community. It must be stated that suggested yield of 40 dwellings is not derived from any physical barriers or delineation on the site and is a arbitrary number to suit the needs of the strategy. Additional land is available for modest increase to this number and Council needs to ensure that there is sufficient flexibility on the policy to allow for additional development to deliver the overall aims of the Core Strategy. Indeed, it may be necessary to consider modest increase in the capacity of this site to create the necessary economies of scale to facilitate the local retail facility.

We have carried out preliminary investigations into the deliverability of the site. These include foul and storm water drainage, highways and access issues and utilities. This research has confirmed the conclusions in the DPD that this site has no conflict with the Outline Water Cycle Study and have all been 'ticked off' in principle by the Highways Authority.

The suggestion that site LSC1 should not be brought forward until 2016-21 is unsubstantiated by fact. There is no real planning basis for this approach and the proposed phasing does not even spread the development equitably over the plan period (the majority coming in the middle 5 years). These is no technical or legal impediment to bringing this site forward in the short term. The Council is not proposing any additional allocations within Colsterworth that could be considered to be prejudiced by bringing LSC1b forward in the plan period and as such it is respectfully suggested that consideration should be given to bringing this site into the first five year period or the deletion of the proposed phasing regime as this is already dealt with in the Core Strategy.

Additionally, South Kesteven’s Housing Land Supply only amounts to 4 year and this has to be viewed as an optimistic assessment based upon current delivery rates. With this in mind the guidance in PPS3 and the policies contained with the development plan are clear. Measures must be put in place to rectify the situation and clearly this will not be achieved by allocating land in the medium to long term. Indeed the draft NPPF is suggesting that LPA’s make allowance for an 20% of deliverable sites and this would clearly exacerbate the situation even further.
Participate at Examination: Yes
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 590493  Mr Daniel Hewett
Consultee: The Crown Estate
Agent: 150520  Mr Daniel Hewett
Agent: Carter Jonas Llp
Consultation Point: LSC1b

Comment ID: SASub11
Type: Web
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT: Justified

Changes to make DPD sound:
Since 2006 a large amount of residential development has taken place in Colsterworth (99 to March 2011). Planning permission remains for a further 64 homes. At the first workshop the Parish Council felt that there should be no further development for the next 20 years. Problem areas were highlighted including traffic congestion in the High Street, more pavements required, no areas suitable for teenage/adult recreation, B676 used as a designated HGV route and sewerage capacity.

The Water Cycle Study has also identified that there is a high risk of fluvial flooding affecting this site. Selection of this site for allocation is not founded on a robust and credible evidence base. More sustainable sites have been put forward in Billingbrough and as a result it is argued that the DPD fails the 'Test(s) of Soundness' as it is not 'Justified'.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 590493 Mr Daniel Hewett
The Crown Estate

Agent: 150520 Mr Daniel Hewett
Carter Jonas Llp

Consultation Point: LSC1c

Comment ID: SASub12
Type: Web
Attached Files:

Is DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified

Changes to make DPD sound:
This site is located at the far south eastern end of the village and appears remote from local services and facilities. Development of this site would encroach into the open countryside and have significant impacts on the landscape character of the countryside. The Evidence Report stated that the Highways Authority has also expressed concerns about drainage within the village.

Selection of this site for allocation is not founded on a robust and credible evidence base. More sustainable sites have been put forward in Billingborough and as a result it is argued that the DPD fails the 'Test(s) of Soundness' as it is not 'Justified'.

Participate at Examination: No
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<tr>
<td>607528 Mr Adrian Golby</td>
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<td>LSC1c</td>
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**Comment ID:** SASub190  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective

1. Within the background documents to the DPD the local authority rank this site as number 2, with site CORB10 (land off Swinstead Road) being ranked number 1. The proposed site, therefore, contravenes the local authority’s own recommendations.

2. The local authority’s own report, in the background documents, states that proposed site would encroach on the open countryside and may have significant impact on the landscape and character of the countryside. The site does not sit adjacent to any residential development.

3. The DPD policy 3.4.3.2 states the Council has made choices about the sites that are the very best option for delivering some local housing......whilst not impinging on the landscape and open countryside. Clearly, the proposed site does not adhere to this policy.

4. The DPD policy 3.4.5.4 states that the provision of a pedestrian and cycle link from the proposed site to Bourne Road provides opportunity to deliver benefits to the local community. The following observations can be made:

- this would benefit only a small number of houses at the Eastern extremities of the village
- the footpath/cycleway would emerge on Bourne Road in very close proximity to the delimited speed sign, a major A road with no pedestrian footpath at this point on either side and adjacent to the two entrances to the fire station
- a better and safer solution would be for a footpath/cycleway to run along the boundary of the Charles Read School playing field which would give direct access to existing pedestrian footpaths and provide a more direct route between existing residential developments.

- any path would extend beyond the proposed site

**Changes to make DPD sound:**

The Council’s original proposed number 1 ranked site CORB10 (in Report to Cabinet, report PLA899 dated 1 August 2011) would be a more sound proposal.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 604904  Mr Richard Oatridge
Agent: SASub41
Consultation Point: LSC1c

Comment ID: SASub41
Type: Letter

[Table]

IS DPD Legally Compliant: Yes
Legal Compliance Reasons: 
Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
I believe the DPD is sound because:
* Exit to A151 from Tanners Lane is insufficient for extra traffic.
* Tanners Lane itself is insufficient for extra traffic and has no two car passing for most of the lane.
* Tanners Lane is already somewhat dangerous for pedestrians - insufficient capacity for extra traffic.
* Site exit to Tanners Lane would create a blind egress.
Ref: CORB04

Participate at Examination: No
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<th>Consultee</th>
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<tr>
<td>26188 Mrs G Noon</td>
<td>Great Gonerby Parish Council</td>
<td>LSC1d</td>
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**Comment ID:** SASub27  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective  
Great gonerby Parish Council wish to make the following comment:  
Easthorpe Road development my not be sufficiently adequate for Great Gonerby.

**Changes to make DPD sound:**

**Participate at Examination:**
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<td>150520 Mr Daniel Hewett</td>
<td>LSC1e</td>
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<tr>
<td>The Crown Estate</td>
<td>Carter Jonas Llp</td>
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**Comment ID:** SASub13  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified  

**Changes to make DPD sound:**
Since 2006 a significant amount of residential development has taken place in Harlaxton (33 to March 2011). Planning permission remains for a further 9 homes. The Evidence Report confirms that the Primary School is at capacity and that there are major concerns about development off Swinehill, due to traffic congestion and poor visibility at junctions.  
The site is located at the southernmost tip of the village and is exposed to the open countryside where there will be a significant impact upon landscape character and the visual character of the village. Selection of this site for allocation is not founded on a robust and credible evidence base. More sustainable sites have been put forward in Billingborough and as a result it is argued that the DPD fails the 'Test(s) of Soundness' as it is not 'Justified'.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>405717 Mr G Cakebread</td>
<td>26011 Mr Mike Sibthorp</td>
<td>LSC1e</td>
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<tr>
<td></td>
<td>Mike Sibthorp Planning</td>
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</tbody>
</table>

Comment ID: SASub103  
Type: Letter  
Attached Files: SASub103.pdf

IS DPD Legally Compliant: Yes

Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective; Consistent with National Policy

Having regard to the assessment criteria used to assess the relative merits of sites, it is not considered that this site represents the most suitable site in the village for residential development. This preferred site has clear shortcomings in terms of impact on what is rising ground, relationship to Harlaxton Manor (and impact on its setting). In traffic terms, the development would place a significant burden on constrained village streets. [see attachment]

Changes to make DPD sound:

It is considered that site HARL03, part of which is consented for the provision of a village shop, is an acceptable and appropriate location for development. The very fact that shop has been granted planning permission on part of the site suggests that this site will be well related to village services. The provision of a refuge will enhance linkages between those parts of the village north and south of the A607. [see attachment]

Participate at Examination: Yes

The respondent wishes to make representations upon the process leading to the identification of preferred site and the relative merits of the identified sites in Harlaxton.
Consultee: Mr Tom Gilbert-Wooldridge
Agent: English Heritage

Comment ID: SASub61
Type: Web
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Justified; Effective; Consistent with National Policy

We strongly object to the proposed allocation of Site LSC1e in Harlaxton (Adjacent to Doctors Surgery, Swinehill) and consider it renders the DPD unsound. The site would be allocated within the boundary of the Grade II* registered park and garden of Harlaxton Manor and impact on the significance and setting of this designated heritage asset as well as the significance and setting of the buildings within the registered park and garden, including the Grade I listed building of Harlaxton Manor. The boundary of the registered park and garden has been drawn to include land that contributes to the significance of this designated heritage asset, and it is notable that there is currently no modern suburban development within the boundary. The allocation would represent a harmful encroachment into the registered park and garden and would also impact on views from the Grade I listed building of Harlaxton Manor and other listed structures. The registered park and garden is on English Heritage’s Heritage at Risk in recognition of ongoing problems regarding its management and ownership (see www.english-heritage.org.uk/risk).

We raised concerns back in 2009 regarding a number of sites proposed for Harlaxton. We felt that all of the sites needed further assessment to ascertain the likely impacts of development on designated heritage assets, and we felt that some of the sites would be unsuitable for allocation. Site LSC1e definitively falls into this category. We do not believe that site is justified both in terms of being based on a robust and credible evidence base and in terms of being the most appropriate site when considered against the reasonable alternatives. The Evidence Document that accompanies this DPD does not give sufficient weight to the impact on designated heritage assets as part of the site assessment process (despite the criteria in the Core Strategy shown in Paragraph 1.1.5). The Sustainability Appraisal fails to recognise negative impacts when assessed against the cultural heritage objectives, claiming that no heritage assets have been identified despite the registered park and garden.

In terms of reasonable alternatives, there will be other sites in Harlaxton where less harm to designated heritage assets will be caused, although many put forward in the 2009 consultation will also cause harm and may not be suitable or deliverable. It may be better to explore other sites in other Local Service Centres (LSCs) where less harm will be caused. We note that only six of the 16 LSCs have been proposed for new site allocations. Paragraph 3.4.3.2 states that another six LSCs are less suitable for additional planned development, but there are four more LSCs unaccounted for in the DPD. Furthermore, Paragraph 3.4.2.3 states that most of the 1000 homes required by the South Kesteven Core Strategy for the LSCs have already been built or consented, which questions whether there a need for much in the way of new allocations.

Harlaxton may require additional services and facilities, but the public benefits of developing Site LSC1e in Harlaxton does not outweigh the substantial harm that
Site Allocation DPD: Submission October 2011 - Consultee Comments

would be caused to designated heritage assets (contrary to national policy in the form of Planning Policy Statement 5, specifically Policies HE7, HE9 and HE10). The site would not be deliverable due to the impact on landscapes and sites of historic and cultural importance (paragraph 4.45 of PPS12). In conclusion, the allocation of Site LSC1e would render the DPD unsound in terms of it not being justified, effective or consistent with national policy.

Changes to make DPD sound:
We recommend that the site is deleted from the DPD, and if the housing numbers require reallocating, a suitable alternative site or sites is identified elsewhere in the Local Service Centres.

Participate at Examination: Yes
We would be happy to attend the relevant hearing session given the level of our concerns regarding the proposed allocation of Site LSC1e.
Consultee: Welby Estate

Agent: The Welby Estate

Consultation Point: LSC1e

Comment ID: SASub201
Type: E-Mail
Attached Files: SASub201.pdf

IS DPD Legally Compliant:
Legal Compliance Reasons:
Is DPD Sound: No

Unsound because DPD NOT:
This report outlines the fundamental issues with the evidence justifying HARLO6 as the most suitable site for housing development with Harlaxton. The site lies within a Grade II* Listed Parkland and within the setting of a Grade I Listed Building. PPS5 clearly states that any loss of heritage assets should be wholly exceptional.

From the information we have received to date there is no justification of why development should occur in the grounds of such an important heritage asset when alternative sites are available. We would expect a strong statement from English Heritage given an allocation within the DPD will in essence act as an outline planning permission for housing development within a Grade II* Listed Parkland. An objection from English Heritage could render the site undeliverable, as such the site should not be allocated and relied upon as a housing delivery strategy.

We strongly believe the evidence on which the site allocation is based is not sufficiently justified and the proposed site does not form a deliverable option for housing development within Harlaxton. Due to this we believe the Site Allocations and Policy DPD is not ‘sound’ and fails to accord with National Planning Policy in its current form.

Changes to make DPD sound:
There has been insufficient evidence to explore the alternatives to provide parking at the school site. Any options which do not impact so greatly upon a heritage asset should be fully considered prior to allocating land for development solely on the justification it can provide community benefit. In this case ADD17 could provide the same level of community benefit without the loss of Grade II* Listed Parkland. Our client has previously put forward a robust strategy for development incorporating community benefit on the site that has minimal impact upon surrounding heritage assets.

Participate at Examination:
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<td>475360 mr paul procter</td>
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<td>LSC1e</td>
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**Comment ID**: SASub60  
**Type**: Web  
**Attached Files**: 

**IS DPD Legally Compliant**:  
**Legal Compliance Reasons**: 

**Is DPD Sound**: No  
**Unsound because DPD NOT**: Effective

The proposed development for Harlaxton is in direct opposition to your own objectives. E.g. Section 4 "It will have no or limited visual impact on the character of the village and surrounding landscape". This area is designated as ancient Parkland on your proposals map, a new housing estate WILL most certainly Spoil the fine view across the park to the Manor.  
Section 3 states "It will not have a detrimental effect on the quality of life of adjacent residents and properties". The development Will definitely have a detrimental effect on ALL residents from Swinehill right along Main Street to the A607. Swinehill is already congested with traffic in the mornings and afternoons because of the school, and doctor's surgery as well as regular through traffic. To allow a 30 house development next to the surgery will result in a considerable increase in noise, pollution and worsen the road safety problems which already exist. A properly conducted traffic survey would reveal large numbers of heavy vehicles, vans and cars, already speed up and down the village every day. The Main Street, which joins up with Swinehill, carries all the traffic from the Manor (including Coaches and goods vehicles), as well as the considerable traffic from the 50 houses on Parklands estate - traffic which is constant, 20 hours out of 24. This is after all, a conservation village, and I don't believe any person in your organisation has any idea of just how much traffic goes through Harlaxton already. The character of Barrowby, Colsterworth, Great Gonerby and Long Bennington has already been spoilt by overdevelopment, and now you propose to start the same process with Harlaxton. Smaller numbers of houses in a wider spectrum of villages is the most sensible proposition, which has again been rejected. Concentrating all development in just 6 villages is absurd. It denies other villages from modest development, which means no new shops, surgeries, recreational facilities, more pub closures etc, FEWER RURAL JOBS, not more which your "vision" is trying to promote. There is a vague reference to affordable housing in other villages, but it carries no conviction, just more consultation. Your LDF vision statements have clearly been put aside.

**Changes to make DPD sound**:  
Details already in text above

**Participate at Examination**: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
443969  Mr Andy Rogers
Capita Symonds

Agent

Consultation Point
LSC1f

Comment ID: SASub125
Type: E-Mail
Attached Files: SASub125.pdf

IS DPD Legally Compliant:  Yes
Legal Compliance Reasons:

Is DPD Sound:  Yes
Unsound because DPD NOT: 

Changes to make DPD sound:
Representation in Support of allocation:
In contrast to the issues affecting the alternative sites in Long Bennington the site at LSC1f is supported by a strong body of evidence which demonstrates that the site is free of significant constraint and could be delivered within the first five years of the Plan. The outline application has involved the design of an access point in consultation with the local highway authority which would provide visibility splays that exceed the standards required for a 30mph road. This access would also be designed to assist with the highway authority’s plans to reduce speeds along Main Road through road narrowing and traffic calming measures. Additional measures such as a new 3m wide footway/cycleway will be provided across the frontage of the site, to improve non-car access to the business park and the village centre.

Additional masterplanning and landscape character work has also been undertaken to demonstrate that the site can successfully accommodate a mix of house types, without having a harmful visual impact upon the surrounding area and which could make a significant contribution towards meeting identified affordable housing requirements in the settlement (see attached Indicative Layout Plan – Ref: CS507169/04).

No flood risk issues are identified for LB02a. Indeed, a flood risk assessment has been carried out for in respect of 35 dwelling development which concluded that subject to appropriate mitigation against the changes to the magnitude and rate of peak runoff caused by the development there would be minimal risk of flooding to the site and adjacent land. The Council’s Part 1 Water Cycle Study has also concluded that the site rates as one of the best within the three towns (excluding Grantham) and the LSCs in terms of limited constraints to development.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 607510  Mr & Mrs Brenda & Colin Braziel

Agent: SASub192

Consultation Point: LSC1f

Comment ID: SASub192  Type: Letter  Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT:
At a recent Parish Council meeting when Planning Application S11/2002 was considered Councillors confirmed that this was the first opportunity they had had to consider LB02 for housing development and were unanimous in agreement that this parcel of land is unsuitable for such development. It would appear therefore that a serious misunderstanding, or even misrepresentation, has occurred relating to PLA899 and the Parish Council’s position. Also at this meeting the Councillors confirmed that there are approximately 100 planning consents within Long Bennington remaining un-progressed.

Changes to make DPD sound:
Prior to the formal confirmation of the Development Plan Document it should be amended thus reflecting the true position of LB02 as being unsuitable for housing development.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tbody>
<tr>
<td>605314</td>
<td>Annette Hewitson</td>
<td>LSC1f</td>
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**Comment ID:** SASub82  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective; Consistent with National Policy

The South Kesteven District Council, Detailed Water Cycle Study, Final Report, November 2011 identifies that flooding in the sewer catchment downstream of Long Bennington needs a strategic solution rather than a local upgrade. This site may be constrained by up to five years. Anglian Water has stated that there is no allowance for any development in Long Bennington until the sewerage system has been upgraded. Any additional development, even small scale, will increase the risk of and be vulnerable to, sewer flooding until the strategic solution is implemented. As such, we do not believe this site is deliverable within the phase stated in the document. The allocation phasing is also contrary to Policy contained in PPS1, PPS12 and PPS23, which all require consideration of environmental capacity and environmental protection in decision making.

**Changes to make DPD sound:**
The phasing for this site should be amended to read 2016–2021 so that the sewerage issues can be resolved before development commences.

**Participate at Examination:** Yes

Insufficient capacity in the sewerage network has significant implications for the environment and compliance with the Water Framework Directive. Development should not be allowed to go ahead until adequate infrastructure is in place.
IS DPD Legally Compliant: No

Legal Compliance Reasons:
Section 3.4.4.1 deals with site allocation in the local service centres and states that each site has been assessed against the same criteria. Whilst this is true in the report to cabinet on 1st August 2011 6 criteria for unsuitable sites are given. These are; A. Too small for allocation (sites of less than 10 houses) B. Highway objection or serious concern/prohibitive cost of improvement works C. High risk of flooding (both fluvial and surface water) D. Impact on the landscape and/or existing built up area E. Encroachment into the open countryside F. Within Anglian Water Cordon Sanitaire
Site LSC1F meets 3 of these criteria, namely B, D, E.

Additionally in section 3.4.4.1 it indicates that a summary of the conclusions for each site can be found in the background evidence to this plan. The summary for site LSC1F is incorrect and vague. Principally it fails to note that onLSC1F a development here will extend into open countryside and be an encroachment into greenbelt land and will have a significant impact on the landscape character of the open countryside. The conclusions also fail to note that development of LSC1F will have a significant impact on the visual character of the village and as it is agricultural land is important to the character and setting of the village.

The DPD is not legally compliant because it is based on incorrect views of the local community including the Parish Council and therefore has not complied with section 20(5)(a) of the Town and County Planning (Local Development) (England Regulations) 2004 as amended (Regulations 2008/2009). Additionally I believe the DPD is not legally compliant because it has selected LSC1F when it is clearly unsuitable as it meets 3 of the unsuitability criteria and relies on an incorrect site summary.

Is DPD Sound: No

Unsound because DPD NOT: Justified

The DPD is unsound because there is no justification for further housing development on site LSC1F. There are already over 100 planning applications approved but not yet built in Long Bennington and development of LSC1F will only add more pressure to an already overstretched infrastructure.
Site LSC1F is on the opposite side of Main road to the most important amenity in Long Bennington, namely the children’s play area and village sports facilities which consist of Bowls club, football pitches, all weather floodlit sports pitch/tennis courts and the village pavilion. These facilities are used by villagers of all ages and on many evenings the sports pitch/tennis courts are used until 10pm. Additionally the sports field is used for car boot sales. The pavilion is used for parties and celebrations and includes changing facilities which are used by local cycling clubs who hold road races in the summer. The car boot sales and pavilion raise much needed funds to maintain these facilities. These facilities are not only vital to the health of both young and old but they also provide a positive activity for young people from the village. Most people who use these facilities reach it by car and the only parking is on Main Road. The proposed access for LSC1F is where most people park. It has been suggested that parking restrictions may be placed on Main Road to allay safety concerns raised by the highways agency. Should this happen then it will have a serious adverse effect on the usage of the most important amenity in Long Bennington. This area of the village is important to the
Site Allocation DPD: Submission October 2011 - Consultee Comments

character and setting of the village and should be preserved. The DPD is unsound because there is no justification to develop LSC1F for housing and threaten the most important amenity in the village.

Changes to make DPD sound:
Delete LSC1f from the DPD for the reasons mentioned above. This view is supported by more than 30 residents validated by a show of hands at a recent Parish Council meeting.
I do not wish to participate at the oral examination. If asked I would be prepared to do so.

Participate at Examination: No
## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26558</td>
<td>Mr G Fearn</td>
<td></td>
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<td></td>
<td>26011 Mr Mike Sibthorp</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mike Sibthorp Planning</td>
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</tr>
</tbody>
</table>

**Comment ID:** SASub102  
**Type:** Letter  
**Attached Files:** SASub102.pdf

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective; Consistent with National Policy

Although the relevant reports indicate that the preferred site (LSC1f) at Main Road, Long Bennington enjoys the support of the Parish Council, it is now very clear that the Parish Council strongly oppose the allocation of the site. They also oppose an undetermined application for residential development on the site. [see attached]

**Changes to make DPD sound:**

The site in my client's ownership, west of Old Great North Road is identified as the second preferred location in Long Bennington. It is of an equivalent size to the preferred site. It is available and deliverable, and meets all the relevant assessment criteria. In the light of the Parish Council's strong opposition to site LB02 (LSC1f), and the absence of objection to site LB18, it is considered that the latter site should be identified as the preferred location.

**Participate at Examination:** Yes  
The respondent wishes to make representations upon the process leading to the identification of preferred site and the relative merits of the identified sites in Long Bennington.
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tbody>
<tr>
<td>607550</td>
<td></td>
<td>LSC1f</td>
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</table>

| Comment ID: SASub178 | Type: Letter | Attached Files: |

IS DPD Legally Compliant: No

Legal Compliance Reasons:
At para 1.2.1 the DPD states "Officers worked with Parish Councils to gauge their views ... to help determine which sites to allocate." The Cabinet Report of 1 August 2011, on which the DPDr depends, shows that Long Bennington Parish Council supports housing development on LSC1f. This is not true. The few members of the Parish Council invited to a consultation on 11 July 2011 were misled into believing that they must rank sites, even though they did not support any of them, otherwise official would do so. Thus pressurised, LSC1f was said to be, possibly, the least unsuitable site for development. In fact, the whole Parish Council opposes such development on LSC1f and this site is earmarked in the Village Plan a suitable only for recreational purposes. The DPD is legally flawed as it relies on a gross misrepresentation of the local community view and has not complied with Section 20(5)(a) of the 2004 Act in a fair and equitable manner.

Is DPD Sound: No

Unsound because DPD NOT: Justified

The DPD is unsound because there is no justification for allocating site LSC1f for housing development. It fails on three of the six suitability criteria. Namely, B. Highway objection or serious concern, D. Impact on the Landscape, and E. Encroachment into the open countryside. With about 100 new homes already having planning approval but not yet progressed, there can be no justification for imposing a further housing estate on Long Bennington with an already stretched infrastructure. LSC1f is situated almost directly opposite the heavily used village sports facilities and children's play area. The new road junction for LSC1f would open onto the area frequently congested with parked vehicles. The attached photographs illustrate this point and show why the Highway Authority has concerns with potential conflict with parked vehicles.

Development on LSC1f would almost certainly require a European Protected Species Licence relating to the bats at the South of the site.

If there are compelling reasons why a new housing estate development site must be allocated to Long Bennington, there are more reasonable alternatives available.

Changes to make DPD sound:
The change I consider necessary to make the DPD sound is to delete site LSC1f from Policy LSC1. This change is supported by more than 30 other village residents who indicated their agreement by a show of hands at a Parish Council meeting.

If there has to be housing development site allocated in Long Bennington, it would be more sensible to designate the site identified as LB12 in the Cabinet Report dated 1 August 2011. This site behind existing static caravans and scrap yard is 2.30ha compared to 2ha for LSC1f. The site entrance is two tenths of a mile to the village school compared to more than three times that distance to LSC1f. The Highway Authority has no concerns about conflict with parked vehicles. The site is adjacent to existing estate type development, has limited impact on the open countryside, and could provide affordable housing.

Participate at Examination: No
Consultee: Mrs Jane Evans
Long Bennington Parish Council

Consultation Point: LSC1f

Comment ID: SASub52
Type: Web

IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified

It does not take proper account of existing but unused planning permissions in the village.
Please note this supersedes comments submitted 14/11/11

Changes to make DPD sound:

Long Bennington Parish Council feel that our response re. the site LB02 was not properly represented with the one-word explanation "yes". On being considered by the full PC rather than the limited number of attendees at the SKDC evening site allocation event, whilst the ranking "1" is not objected to, this site is not supported given concerns over this site related to access/road safety, drainage, extending the village envelope, wildlife habitat and the fact that it had been allocated for playing field use in the 2005-15 village plan. It would therefore be preferable to say "no". We should also raise concerns that a site indicated for 30 potential dwellings is now subject to an application for 35.

Participate at Examination: No
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>590493 Mr Daniel Hewett</td>
<td>150520 Mr Daniel Hewett</td>
<td>LSC1f</td>
</tr>
<tr>
<td>The Crown Estate</td>
<td>Carter Jonas Llp</td>
<td></td>
</tr>
</tbody>
</table>

**Comment ID:** SASub14

**Type:** Web

**Attached Files:**

**IS DPD Legally Compliant:** Yes

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Justified

**Changes to make DPD sound:**

Since 2006 a significant amount of residential development has taken place in Long Bennington (64 to March 2011). Planning permission remains for a further 60 homes. According to the evidence base both the local medical centre and The Primary School are at capacity.

The Evidence Report also states that there have been two reported flooding incidents in the north of the village with Main Road flooding due to inadequate surface water drainage, and Westborough Lane from the river floodplain. Selection of this site for allocation is not founded on a robust and credible evidence base. More sustainable sites have been put forward in Billingborough and as a result it is argued that the DPD fails the 'Test(s) of Soundness' as it is not 'Justified'.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 26231  Mr D Bainbridge
Agent: Bidwells
Consultation Point: Housing Development and Managing Delivery (3.5)

Comment ID: SASub114
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT: Effective
To aid management of housing delivery and supply across the District (excluding Grantham) it would be helpful for a table to be included showing the proposed housing allocations for each settlement in the SAP DPD.
This table would provide a single source of the proposed allocations including housing numbers and locations.
The absence of such a table means that effective delivery of sites across the District (excluding Grantham) can not be readily viewed and considered.

Changes to make DPD sound:
To aid management of housing delivery and supply across the District (excluding Grantham) it would be helpful for a table to be included showing the proposed housing allocations for each settlement in the SAP DPD.

Participate at Examination: Yes
To participate fully in the oral examination and to enable the Inspector to pose questions on this response.
IS DPD Legally Compliant: Yes

Legal Compliance Reasons:
Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective

Reasons why it is not justified:
With regard to paragraph 3.5.1, we are concerned that there is no clear justification for the allocation of specific sites to particular five-year phases, based on site characteristics or timescales for delivery.

Whilst there may be a rationale for phasing the delivery of sites in certain circumstances, the phasing provisions of this DPD appear arbitrary. Whilst some sites could be “constrained in the early part of the plan period by the capacity of existing infrastructure and the need for improvements prior to development” (para 3.5.1) this does not provide a basis for the phasing provisions in Policy STM1 for example, as there is no evidence that site STM1c carries such constraints.

The provision for phasing within this section is not therefore informed by a robust and credible evidence base. This is contrary to a key question raised in the Inspectorate’s soundness guidance in relation to the test of justification: i.e. “Is the content of the DPD justified by the evidence? What is the source of the evidence? How up to date is it and how convincing is it?”

Without proper justification the provision for phasing in section 3.5 of the DPD will be unnecessarily restrictive in terms of the delivery of development.

The statement in paragraph 3.5.2 that “Planning permission will not normally be granted for allocated housing sites earlier than 12 months before the beginning of the phase identified in the allocating policy” appears to set an arbitrary constraint on when planning permission will be granted in relation to each phase. There is no clear basis or justification for the 12 months referred to.

We consider that it would be justifiable and appropriate to grant permission for sites in advance of 12 months before the beginning of each phase in view of the long lead in time to the development process, including the time taken to finalise of S106 agreements and site preparation. It would be particularly inappropriate to restrict outline planning permissions to this 12 month rule as it can, in some cases, be a number of years before planning permission is granted for reserved matters and could prevent sufficient delivery of housing within the identified phase.

Reasons why it is not effective
Section 3.5 is not “effective” as it does not allow a sufficient degree of flexibility.

Paragraph 3.5.3 states that “if during the plan period it is clearly demonstrated that insufficient housing development has taken place, that allocated housing sites have not been delivered in accordance with the phasing strategy and that there is not a five year supply of deliverable housing land, consideration will be given to re-prioritising the phasing of sites.”
Site Allocation DPD: Submission October 2011 - Consultee Comments

This is not effective because it is not clear how the re-prioritising of sites is to be achieved within the development plan process. The delivery mechanism and timescale for the implementation of this re-prioritisation is not clear.

Changes to make DPD sound:
We consider that references to limiting the delivery of development to five year phases and preventing the grant of planning permission for allocated sites more than 12 months before the beginning of the relevant phase, should be deleted. References to re-prioritising sites should also be deleted whilst there is no clear mechanism for this process.
These changes will delete wording in the DPD that we consider to be not justified and not effective.

Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to demonstrate that the phasing provisions set out in Section 3.5 are not justified or effective, which impacts upon the soundness of the DPD.
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<th>Consultee</th>
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<tbody>
<tr>
<td>372928 Mr Tom Gilbert-Wooldridge</td>
<td>English Heritage</td>
<td>Policy SAP H1: Other Housing Development</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub62  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We welcome the inclusion of this policy to address other housing development and the intention to resist development on greenfield sites other than those that have been allocated. The reference to historic environment issues via the development criteria for small infill sites and brownfield redevelopment sites is welcomed.

**Participate at Examination:** No
Consultee: 490730 Mr Alan Hubbard
The National Trust

Consultation Point: Policy SAP H1: Other Housing Development

Comment ID: SASub219
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
The approach is consistent with the overall core Strategy and provides for suitable brownfield development and edge of settlement developments to be brought forward where appropriate. Criteria iii) and iv) provide appropriate safeguards that should ensure that the special character of settlements is adequately protected. Accordingly the policy is supported.

Participate at Examination:
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<tr>
<td>402634 Mr Rex Hill</td>
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<td>Policy SAP H1: Other Housing Development</td>
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</table>

**Comment ID:** SASub168  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**
- support:
  
  It should be borne in mind that BASTON has already been the subject of considerable expansion/large scale development in recent years and that there seems to be a steady, well integrated programme of infill and extension improvement work ongoing. This, I would suggest, is a more acceptable and, visually, more appropriate way for the village to develop.

**Participate at Examination:**
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<th>Consultee</th>
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<tbody>
<tr>
<td>474396  Mr Gordon Smith</td>
<td></td>
<td>Retention of Services and Facilities (4.1)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub149

**Type:** E-Mail

**IS DPD Legally Compliant:**

Legal Compliance Reasons:

**Is DPD Sound:** No

**Unsound because DPD NOT:** Effective

Drafting of introduction is poor and appears to apply policies only to LSCs. Make it clear that much of this chapter's content will also apply to main towns such as Market Deeping and Deeping St James.

**Changes to make DPD sound:**

Drafting of introduction is poor and appears to apply policies only to LSCs. Make it clear that much of this chapter's content will also apply to main towns such as Market Deeping and Deeping St James.

**Participate at Examination:**
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<tr>
<td>605165 Mr A Jennings</td>
<td></td>
<td>Paragraph (4.1.4)</td>
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</table>

**Comment ID:** SASub185  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:**  

**Legal Compliance Reasons:**

**Is DPD Sound:**

**Unsound because DPD NOT:**

**Changes to make DPD sound:**

It should be noted that Parochial Church Councils are usually at the centre of community life. Traditional vicarages are also an important local community amenity eg Billingborough vicarage and the Church is constantly selling these off. Attempts by the Church to sell vicarages with traditional amenities for local fetes etc should be resisted as this impoverishes community life.

**Participate at Examination:**
Consultee Comments

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<tr>
<th>Consultee ID</th>
<th>Consultee Name</th>
<th>Agent</th>
<th>Consultation Point</th>
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</thead>
<tbody>
<tr>
<td>372928</td>
<td>Mr Tom Gilbert-Wooldridge</td>
<td>English Heritage</td>
<td>Policy SAP1: Retention of Community Services and Facilities</td>
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</tbody>
</table>

Comment ID: SASub63
Type: Web

<table>
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<tr>
<th>IS DPD Legally Compliant</th>
<th>Legal Compliance Reasons</th>
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<td>Yes</td>
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<tr>
<td>Is DPD Sound:</td>
<td>No</td>
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<tr>
<td>Unsound because DPD NOT:</td>
<td>Effective</td>
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While we support the aims of the policy to retain community services and facilities, it is not clear whether the policy only applies to the Local Services Centres (LSC) rather than other settlements. The loss of community services and facilities can be detrimental to any settlement, from one of the four towns to smaller (non-LSC) villages. This can have implications for the historic environment if historic buildings change use or are lost altogether, and could affect listed buildings and conservation areas. The recognition of conservation areas in Paragraph 4.1.14 is therefore welcomed, but we would like clarity to which settlements the policy applies.

Changes to make DPD sound:
We would like the policy to apply to all settlements across the district in order to make the DPD sound, effective and deliverable.

Participate at Examination: No
### Consultation Comments

#### Consultee
474396  Mr Gordon Smith

#### Consultation Point
Policy SAP1: Retention of Community Services and Facilities

#### Comment ID: SASub150

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#### IS DPD Legally Compliant:

#### Legal Compliance Reasons:

#### Is DPD Sound: No

#### Unsound because DPD NOT:

Use of the term "village" would exclude main towns.
The policy does not offer sufficient practical guidance for testing viability or guiding those who seek change. See example of South Holland’s ‘Policy for the Conversion of rural buildings’ which will offer further ideas.

#### Changes to make DPD sound:

Further guidance note including worked examples may be needed with commitment to produce one expressed in this document.

#### Participate at Examination:
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tbody>
<tr>
<td>475706 Miss Clare Sterling</td>
<td>Lincolnshire Wildlife Trust</td>
<td>Policy SAP2: Rural Exception Affordable Housing</td>
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</tbody>
</table>

**Comment ID:** SASub88
**Type:** Web

**IS DPD Legally Compliant:** Yes
**Legal Compliance Reasons:**
**Is DPD Sound:** Yes
**Unsound because DPD NOT:**

**Changes to make DPD sound:**
SAP 2 – rural exception affordable housing

The Lincolnshire Wildlife Trust supports the requirement for development to avoid areas which are protected because they are important for wildlife, biodiversity or natural assets. ‘Protected’ sites should include statutorily designated sites such as Sites of Special Scientific Interest (SSSIs) as well as non-statutory sites such as Local Wildlife Sites (LWSs) and Sites of Nature Conservation Importance (SNCIs). All sites should be subject to an ecological survey at the planning application stage to determine whether the site supports any important or protected habitats or species. Any important habitats or species found on site should be protected and any adverse effects mitigated against. If it would not be possible to mitigate against any adverse effects then the site should not be granted planning permission. The Council has a duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to have regard to the conservation of biodiversity in exercising its functions.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<td>English Heritage</td>
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**Comment ID:** SASub64  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**
We welcome reference to the historic environment and character in the policy wording, particularly as most of the villages will contain designated heritage assets such as listed buildings and conservation areas. Some clarification might be needed for the term “built up part of the village”, as this could be open to interpretation, particularly as the district does not appear to use settlement boundaries for its towns and villages.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
490730  Mr Alan Hubbard

The National Trust

Consultation Point
Policy SAP3: Supporting Local Business in Local Service Centres

Comment ID: SASub216
Type: E-Mail

Attached Files:

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: Yes

Unsound because DPD NOT:

Changes to make DPD sound:

It is agreed that a criteria based policy should be included to enable appropriate business development within the LSCs; subject to the retention of the specific criteria in the detailed policy (including the requirements set out in the final paragraph of the policy) the Trust is satisfied that it provides an appropriate basis for the assessment of individual proposals.

Participate at Examination: No
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<td>475706 Miss Clare Sterling</td>
<td>Lincolnshire Wildlife Trust</td>
<td>Policy SAP3: Supporting Local Business in Local Service Centres</td>
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**Comment ID:** SASub89  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**  
SAP 3 – supporting local business in Local Service Centres

The Lincolnshire Wildlife Trust supports the requirement for development to avoid areas which are protected because they are important for wildlife, biodiversity or natural assets. ‘Protected’ sites should include statutorily designated sites such as Sites of Special Scientific Interest (SSSIs) as well as non-statutory sites such as Local Wildlife Sites (LWSs) and Sites of Nature Conservation Importance (SNCIs). All sites should be subject to an ecological survey at the planning application stage to determine whether the site supports any important or protected habitats or species. Any important habitats or species found on site should be protected and any adverse effects mitigated against. If it would not be possible to mitigate against any adverse effects then the site should not be granted planning permission. The Council has a duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to have regard to the conservation of biodiversity in exercising its functions.

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<td>372928</td>
<td>Mr Tom Gilbert-Wooldridge</td>
<td>Policy SAP3: Supporting Local Business in Local Service Centres</td>
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English Heritage

Comment ID: SASub65

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<th>Attached Files:</th>
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IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: Yes

Unsound because DPD NOT:

Changes to make DPD sound:

We welcome reference to the historic environment and character in the policy wording.

Participate at Examination: No
## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<td>372928</td>
<td>Mr Tom Gilbert-Wooldridge</td>
<td>Policy SAP4: Business Development in the Countryside</td>
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<td></td>
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<td>(Including Rural Diversification Schemes)</td>
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**Consultee:** English Heritage

**Comment ID:** SASub66  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**  
We welcome reference to the historic environment and character in the draft policy wording, particularly as the conversion of certain types of rural historic buildings needs to be carefully assessed.

**Participate at Examination:** No
Consultee: Miss Clare Sterling
Agent: Lincolnshire Wildlife Trust

**Consultation Point:**
Policy SAP4: Business Development in the Countryside
(Including Rural Diversification Schemes)

**Comment ID:** SASub90
**Type:** Web

**IS DPD Legally Compliant:** Yes
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes
**Unsound because DPD NOT:**

**Changes to make DPD sound:**
SAP 4 – business development in the countryside (including rural diversification schemes)
The Lincolnshire Wildlife Trust supports the requirement for development to avoid harm to areas, features or species which are protected because they are important for wildlife, biodiversity or natural assets. ‘Protected’ sites should include statutorily designated sites such as Sites of Special Scientific Interest (SSSIs) as well as non-statutory sites such as Local Wildlife Sites (LWSs) and Sites of Nature Conservation Importance (SNCIs). All sites should be subject to an ecological survey at the planning application stage to determine whether the site supports any important or protected habitats or species. Any important habitats or species found on site should be protected and any adverse effects mitigated against. If it would not be possible to mitigate against any adverse effects then the site should not be granted planning permission. The Council has a duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to have regard to the conservation of biodiversity in exercising its functions.

**Participate at Examination:**
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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26102 Mr P R Tame</td>
<td>National Farmers Union</td>
<td>Policy SAP4: Business Development in the Countryside (Including Rural Diversification Schemes)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub3  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Consistent with National Policy

We are concerned that the fourth criteria in the policy, concerning landscape, will be used to prevent much development which would deserve to be allowed. It will be easy for the Council to say that any development affects the character of the landscape and therefore that the development should not be allowed. We are concerned that the final paragraph of SAP4, on page 46 about viability and appropriateness to rural setting is against Government policy as it does not promote development but severely limits it.

**Changes to make DPD sound:**

Change the fourth criteria to read along the following lines:

"The use/development does not significantly affect the character and appearance of the local landscape, having particular regard to the Landscape Character Assessment."

Remove the final paragraph on page 46 of policy SAP4.

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 490730  Mr Alan Hubbard

Agent: The National Trust

Consultation Point: Policy SAP4: Business Development in the Countryside (Including Rural Diversification Schemes)

Comment ID: SASub215
Type: E-Mail

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: Yes

Unsound because DPD NOT:

Changes to make DPD sound:
It is agreed that a criteria based policy should be included to enable appropriate rural diversification schemes, including where necessary to meet the reasonable needs of rural based tourism attractions; subject to the retention of the specific criteria in the detailed policy (including the requirements set out in the penultimate paragraph of the policy) the Trust is satisfied that it provides an appropriate basis for the assessment of individual proposals.

Participate at Examination: No
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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<tbody>
<tr>
<td>475706 Miss Clare Sterling</td>
<td></td>
<td>Policy SAP5: Locally Important Existing Employment Sites</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub91  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Consistent with National Policy

SAP 5 – locally important existing employment sites  
Existing employment sites may have the potential to support protected or important habitats or species. We would therefore wish to ensure that all sites are subject to an ecological survey at the planning application stage. Any important habitats or species found on site should be protected and any adverse effects mitigated against. If it would not be possible to mitigate against any adverse effects then the site should not be granted planning permission. The Council has a duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to have regard to the conservation of biodiversity in exercising its functions.

**Changes to make DPD sound:**

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tbody>
<tr>
<td>294235 Mr Mark Mann</td>
<td>Savills</td>
<td>Policy SAP5: Locally Important Existing Employment Sites</td>
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Comment ID: SASub223
Type: Letter
Attached Files: SASub220-224.pdf

IS DPD Legally Compliant:
Legal Compliance Reasons:
Is DPD Sound: No

Unsound because DPD NOT:
In respect of site ExE S3 we note that this site comprises the offices and warehouse buildings of FH Gilman, including the concrete plant together with CWG site which is a mixed use including a substantial element of open retail use. The bonded warehouse to the north of the ExE S3 is excluded from this site for some reason.
We note that Policy SAP5 currently prohibits retails uses form these areas. We understand that the Council are likely to grant consent to the Morrisons retail scheme and this will result in the FH Gilman site being sandwiched between two areas of retail use, one of which CWG is actually within the proposed employment site.
Notwithstanding the proposed wording of policy SAP5, it would appear that the Council accept that this area is appropriate for retail development and that retail uses already exists within the site. We suggest that the wording of this policy is amended to expand the range of appropriate uses. Retail uses including car showrooms and other uses including community, leisure and hotel uses generate significant numbers of jobs and are valuable contributors to the local economy and as such are entirely appropriate in employment areas.
Town centre uses such as retail are already covered by other policies such as Policy E2 of the Core Strategy.
In respect of the above ‘urban regeneration’ sites and employment sites we consider that the proposed DPD is largely sound.

Changes to make DPD sound:
We support Policy SAP5: and the inclusion of the FH Gilman site within site ExE S3. However we suggest that the uses considered appropriate in such areas is enlarged to include other uses. Although community and leisure uses are considered acceptable in such areas retail is specifically excluded. We suggest that retail uses including car showrooms etc should not be excluded form such areas as they are significant employers. Adequate controls over retail uses are provided elsewhere. We suggest that suitable uses including tourism, leisure, community and retail uses which generate jobs should be specifically referred to in the policy.

Participate at Examination: Yes
## Site Allocation DPD: Submission October 2011 - Consultee Comments

### Consultee
372928  Mr Tom Gilbert-Wooldridge  
English Heritage

### Agent

### Consultation Point
Policy SAP5: Locally Important Existing Employment Sites

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<th>Comment ID:</th>
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<td>Type:</td>
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**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**

We accept that many of the sites listed in the table that follows this policy are already developed and impacts on the surrounding environment have already occurred. However, some of the sites have not yet been fully developed (such as ExE B1 or ExE D1), while any of the existing sites could be redeveloped as suggested by the draft policy. Therefore, this policy could have additional impacts on the surrounding environment, including heritage assets (such as the setting of Burghley Park and the scheduled remains of St Leonard’s Priory in the case of ExE S4). The Sustainability Appraisal incorrectly states that there will be no environmental impacts, but this is not necessarily true if sites are extended or redeveloped. We recommend that the policy makes reference to environmental issues in line with other policies such as SAP4.

**Participate at Examination:** No
Consultee: 474236  Mr N Grace
Savills

Consultation Point: Policy SAP 6: Employment Development at Gonerby Moor

**Comment ID:** SASub174
**Type:** Letter
**Attached Files:** SASub174.pdf

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**IS DPD Legally Compliant:**
**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**
We are supportive of Policy SAP6, and consider that our client's land, specifically the 200 acres in Appendix 4 [see attached] can be the only "additional land" capable of coming forward in the plan period taking into account each element of proposed Policy SAP6.

**Changes to make DPD sound:**
There are very special circumstances that should apply to Gonerby Moor. It is an anomaly that it should not be considered part of Grantham. Similarly, it is a unique location which the Council acknowledges by identifying that there could be justification for further employment development. We would like the adopted DPD covering Gonerby Moor to provide clarity and highlight the special strategic rail linked opportunity that this land has.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 606978    Mr Robert Jenkinson
Agent: 26002 Escritt Barrell Golding

Consultation Point: Policy SAP 6: Employment Development at Gonerby Moor

Comment ID: SASub121
Type: Letter

IS DPD Legally Compliant: Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT: Justified

Paragraph 4.4.8 of the DPD states that "there may be scope for additional land at Gonerby Moor to come forward during the plan period." The majority of the land within area GMOOR02 is below the steep hill and there is an existing access to the B1174 which could be improved.

Changes to make DPD sound:
Inclusion of area GMOOR02 for future Industrial Development

Participate at Examination: No

Attached Files:

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Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>474396</td>
<td></td>
<td>Policy SAP7: Development Within the Defined Town Centres</td>
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</table>

Consultee ID: SASub151
Type: E-Mail

Is DPD Legally Compliant: Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT:
The Plan does not identify sufficient land or buildings to accommodate the projected demand for ‘town centre’ uses’ quoted on paragraph 4.6.4. and in background documents [see attachment]

Changes to make DPD sound:
Sites should be more clearly identified and protected.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
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<tbody>
<tr>
<td>26270 Miss Gill Brown</td>
<td>25977 Mr N Gough</td>
<td>Policy SAP7: Development Within the Defined Town Centres</td>
</tr>
<tr>
<td>Bigwood</td>
<td>Bigwood Associates</td>
<td></td>
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Comment ID: SASub173
Type: E-Mail
Attached Files: SASub173.pdf

IS DPD Legally Compliant:
Is DPD Sound: No

Unsound because DPD NOT: Effective; Consistent with National Policy

It cannot be consistent in national planning policy for the relevant community strategy to omit a Proposals Plan identifying the extent and boundaries of the town centre of Bourne and for these reasons the plan is unsound.

The plan is neither coherent nor effective if there is a policy where there is reference to a Proposals Plan which is not within the document. Implementation of those policies cannot properly follow and there is no planning logic in having a policy without an appropriate Proposals Plan. For these reasons the plan is unsound.

Changes to make DPD sound:
Policy SAP7 should have the benefit of an appropriate Proposals Map identifying the extent and boundary of the town centre of Bourne.

Participate at Examination: Yes
The town centre policies have unrealistic ambitions to accommodate the substantial growth anticipated up to 2026. A more robust assessment of accommodating the growth of town centre uses is needed. The aim is to ensure that the housing and employment focus of the plan is balanced with more site-specific conclusions on retail, health, education etc. This may mean more edge and out of town centre development to ensure that growth does not ‘leapfrog’ the Deepings.

Changes to make DPD sound:

Participate at Examination:
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>372928</td>
<td>Mr Tom Gilbert-Wooldridge</td>
<td>Policy SAP7: Development Within the Defined Town Centres</td>
</tr>
</tbody>
</table>

#### Comment ID: SASub68
- **Type:** Web
- **Attached Files:**

#### IS DPD Legally Compliant: Yes
#### Legal Compliance Reasons:

#### Is DPD Sound: Yes
#### Unsound because DPD NOT:

#### Changes to make DPD sound:

We broadly support this policy and the intention to protect retail uses in town centres. The centres of Stamford, Bourne and Market Deeping are all covered by conservation areas and have a number of listed buildings. The vitality of the town centre and the vitality of the conservation areas rely on a mix of uses and a high level of A1 uses should enable that vitality to remain. Non-retail development on the upper floors of buildings within the Primary Shopping area should preserve the vitality of the conservation areas by allowing active uses rather than vacant spaces, although it will depend on the exact nature of development and how sympathetic it is to the conservation areas and any listed buildings.

#### Participate at Examination: No
Consultee: Aldi Stores Ltd

Comment ID: SASub93
Type: Web
Attached Files:

IS DPD Legally Compliant: No
Legal Compliance Reasons:
There is a requirement for DPD’s to be based on a sound and credible evidence base and for the evidence base that has been prepared to be accurately taken into account in the policies contained in the DPD. Paragraph 4.6.4 states that the [2010 NLP] Retail Study identifies potential capacity in Stamford of about 8,000 to 9,000 sq m [gfa of A1 to A5 floorspace] "much of which could be met by the reoccupation of vacant units". The words quoted are an incorrect interpretation of the NLP Retail Study which actually states, at paragraph 14.3, that "The projection for floorspace to accommodate new Class A1 to A5 uses in Stamford could be up to 9,400 sq m gross by 2016 increasing to 17,300 sq m gross by 2021. The reoccupation of vacant floorspace is unlikely to reduce this projection significantly". While the NLP Study goes on to state (same paragraph) that the 2016 projection could reduce to about 8,000 sq m gross through the re-allocation of capacity to Grantham and Bourne and vacant units, it is incorrect to state that much of the identified capacity can be met through re-occupation of vacant units within Stamford. The effect of the wording of this paragraph as it stands is to underestimate the scale of A-class retail floorspace need within Stamford over the period to 2016.

Is DPD Sound: No
Unsound because DPD NOT: Consistent with National Policy
Para EC5.1 of PPS4 requires LPA to identify a range of appropriate sites to meet identified needs, ensuring that sites are capable of accommodating a range of business models. Policy EC5.5 places a requirement on LPA's, having identified sites for development, to ensure that sufficient sites are allocated to meet the first five years identified need. It appears that the LPA's erroneous interpretation of the Retail Study findings in respect of Stamford has resulted in the LPA failing to allocate any suitable sites for new class A1 uses in the town.

Changes to make DPD sound:
The wording of paragraph 4.6.4 should be redrafted to more accurately reflect the findings of the NLP Retail Study which forms the evidence base for the retail policies.

Participate at Examination: No
## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>474396</td>
<td></td>
<td>Policy SAP8: Town Centre Opportunity Areas</td>
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</table>

**Comment ID:** SASub152  
**Type:** E-Mail

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:**

The Plan does not identify sufficient land or buildings to accommodate the projected demand for ‘town centre’ uses’ quoted on paragraph 4.6.4. and in background documents.

The expression used to ‘support’ sites for town centre uses (5th line) is weak in the context of site shortage. The language of the Policy does not protect valuable town centre sites from say, housing development - suggest strengthen wording to state housing should not be acceptable at ground floor level.

**Changes to make DPD sound:**

Sites should be more clearly identified and protected. If the sites are not identified and protected there is a risk of investment ‘leapfrogging’ the town centre into the industrial estate.

**Participate at Examination:**

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### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tbody>
<tr>
<td>428033</td>
<td>Sainsburys Supermarkets Ltd Indigo Planning Limited Sainsburys Supermarkets Ltd</td>
<td>Policy SAP8: Town Centre Opportunity Areas</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub161  
**Type:** E-Mail  
**Attached Files:** SASub161.pdf

**IS DPD Legally Compliant:** No  
**Legal Compliance Reasons:**  
Policy is not compliant with national planning policy (PPS4)

**IS DPD Sound:** No  
**Unsound because DPD NOT:** Consistent with National Policy

The above proposed policy relates to the Council’s identified ‘town centre opportunity areas’ and states that proposals for these sites will be supported in accordance with the respective adopted Core Strategy. The proposed policy also sets out the Council’s approach for retail development in edge or out of centre locations, and lists what criteria will need to be met by such proposals. The sequential approach is a key policy objective to retail/main town centre uses; there is a fundamental acceptance in the sequential approach that out of centre development is appropriate in certain circumstances. Indeed, being economic development, for which there is highly facilitative support in planning policy, it is encouraged where it satisfies the sequential test along with the impact test.

The sequential approach recognises that in those circumstances where there are no prospective town or edge of centre sites, preference is to be given to sites which are accessible by a range of transport modes and where co-location with complementary facilities will reduce transportation impacts. Furthermore, the range of complementary retail uses, and therefore the opportunity for linked trips, makes Markham Retail Park, a preferable out of centre location. PPS4 recognises at paragraph EC2.1(e) the benefits of co-locating mutually appropriate development. Existing retail destinations provide the most sustainable locations for further development given that these already have the necessary infrastructure and provide the opportunity to encourage linked trips, which are inherently sustainable.

This is quite apparent from the Council’s previous grant of planning permission for the Sainsbury’s store, for which it was deemed that the sequential test had been passed (along with the other planning policy tests).

Stamford Town Centre is also physically constrained by the significant heritage assets it contains (e.g. conservation area and listed buildings). The majority of the town centre also immediately adjoins residential development, and therefore opportunities for new town centre development (retail, offices, or leisure) within or on its edge are extremely limited. In these circumstances it is important that existing out of centre locations should be given appropriate consideration in the spatial approach of the Plan. Markham Retail Park should be explicitly acknowledged within the DPD as the preferred location for retail development outside of the town centre.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Changes to make DPD sound:
We therefore respectfully suggest that Policy SAP8 is amended to support further retail development at such existing out of centre locations, ahead of other locations, subject to those circumstances where the sequential test and impact tests are met.

Participate at Examination: Yes
Sainsbury’s Supermarkets Ltd is a major employer and significant service provider in the South Kesteven District and has an important role to play in the community.
Their new Stamford store occupies an established and accessible retail destination. It is recommended that the DPD is amended to support further retail development in such locations when the tests of PPS4 are met.
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tbody>
<tr>
<td>604559 Mr Nick Sewell</td>
<td>604554 Ms Tamsin Cottle</td>
<td>Policy SAP8: Town Centre Opportunity Areas</td>
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NewRiver Retail

**Comment ID:** SASub85  
**Type:** Web  
**Attached Files:**

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<th>IS DPD Legally Compliant:</th>
<th>Legal Compliance Reasons:</th>
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**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective

Given the wording within Policy E2 of the adopted Core Strategy we would expect the SAPDPD to include site allocations for additional retail floorspace. The most recent Retail Needs Study identifies that there is a requirement throughout the District for additional retail floorspace and therefore we would expect to see some guidance as to where this additional floorspace should go. The document includes specific allocations for housing and employment land but no allocations for retail development.

The SAPDPD identifies a potential capacity in Market Deeping of about 2300 sq m by 2016 and states that this is not expected to be met by simply re-occupying the vacant units. However the 3 sites identified in the Retail Needs study as being able to accommodate this additional floorspace, are not carried forward into the SAPDPD.

Policy SAP8 alludes to opportunity areas within the town centres, however it does not explicitly state where these are. In order to understand where the potential opportunity areas in the Town Centre are, we look at the three sites identified in the Retail Needs Study.

**Herewards Discount Store**  
- The site is of insufficient size to accommodate the scale of floorspace identified by the Retail Needs Study. The site will also require some site clearance which makes its re-development unviable. The site is better suited for smaller-scale retail and commercial leisure developments which could contribute to the medium term requirement for additional floorspace. It would not however bring about the benefits that the application proposal will do so in terms of increasing market share and retaining some of the expenditure that is currently being lost to centres elsewhere.

**The Precinct & Car Park Land**  
- This includes the parade of small retail units known as The Precinct which link the Co-Operative foodstore to the High Street and a large area of car parking to the rear of the Precinct which is also used for the Wednesday market.

The site is suitable for retail development, however this would require substantial reconfiguration of the site, and the costs of this would reduce the viability of any scheme substantially. Any redevelopment of this site would involve not only the displacement of the existing retailers but also the Wednesday market and the existing car parking. In addition, the site cannot be considered available in the short term, as many of the units are currently occupied, this is a view also endorsed by the Retail Needs Study.

**Land Adjacent to the Co-Operative Foodstore**
Site Allocation DPD: Submission October 2011 - Consultee Comments

-The site is currently in use as a petrol filling station, and a servicing yard to the foodstore. The viability of the site would be compromised by the limited retail development which would be able to come forward, and the costs associated with relocating the petrol filling station. We therefore conclude that none of these three sites will meet the identified requirement for additional floorspace in Market Deeping up to 2016. We therefore propose the following the recommendation/changes:

Changes to make DPD sound:

Recommendations

In accordance with Policy E2 of the Core Strategy we think the SAPDPD should allocate sites in the existing centres to help meet the identified retail floorspace requirements. Having assessed the three sites identified by the Retail Needs Study we see some potential for these site to come forward for retail development but not at the scale required to meet the identified need. In addition these sites are already in retail use and so do not provide the opportunity to introduce new retailers or the modern footprints that retailers require.

We therefore do not believe the identified requirements for Market Deeping can be met in full on the sites identified in the Retail Needs Study or on sites within the existing town centre boundary.

We therefore propose that the application site is allocated as an opportunity area that can deliver the identified retail floorspace requirements in the short to medium term.

This will not prejudice sites within the existing town centre boundary coming forward but rather it will bring investment into the area which will help bring these vacant units back into use.

In conjunction with this we recommend that the town centre boundary is extended to include the application site as we believe this area will function as part of the existing centre.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>605165 Mr A Jennings</td>
<td></td>
<td>Policy SAP9: Bourne Core Area</td>
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</table>

Comment ID: SASub186
Type: Letter
Attached Files:

IS DPD Legally Compliant:  
Legal Compliance Reasons:  
Is DPD Sound: No
Unsound because DPD NOT:  
While redevelopment is required, I have already expressed the view that comprehensive redevelopment by a single developer is not the way to create a living community. A variety of building types and styles is required. Development in this sensitive spot must be small scale, piecemeal and in a mix of styles cognisant of the local vernacular, to achieve the appropriate mix, and should follow the existing historic street pattern. A large developer will not have the great sensitivity or even the local knowledge, or the inclination, required to achieve this. 
There is also golden opportunity to rehabilitate the historic eastern part of Wherrys Lane to its rightful role as an important amenity for residents and visitors and part of the historic centre. Restoration rather than redevelopment, of a highly sensitive kind, for retail use to make shopping in Bourne more attractive, is required here.

Changes to make DPD sound:  
Participate at Examination:
## Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>372928</td>
<td>Mr Tom Gilbert-Wooldridge</td>
<td>Policy SAP9: Bourne Core Area</td>
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<td>English Heritage</td>
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**Comment ID:** SASub69  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes

**Legal Compliance Reasons:**

**Is DPD Sound:** Yes

**Unsound because DPD NOT:**

**Changes to make DPD sound:**

> We welcome reference to the redevelopment of this area needing to reflect the historic development of the town and be of a high quality design and appearance. The Core Area straddles the boundary with Bourne Conservation Area, adjoins a number of listed buildings and may contain heritage assets itself, so any proposal will need to preserve and enhance the historic environment.

**Participate at Examination:** No
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<tbody>
<tr>
<td>487941</td>
<td>Mr M Newton</td>
<td>Policy SAP10: Open Space Provision</td>
</tr>
<tr>
<td>Boyer Planning</td>
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Comment ID: SASub195  
Type: E-Mail  
Attached Files: 

- **IS DPD Legally Compliant:** Yes  
- **Is DPD Sound:** No  
- **Unsound because DPD NOT:** Justified  
  We consider that the principles of the policy are sound but the precise standards do not appear to have a clear and sound technical basis or justification.

**Changes to make DPD sound:**
Supporting text should be provided to justify the precise standards of open space (and in particular, to explain the relationship between the quantum required, population and proximity). If this cannot be provided, the precise numerical standards should be re-considered and greater flexibility applied to the application of the policy in the light of the circumstances of each development site and its surrounding area.

**Participate at Examination:** Yes  
We consider it necessary that we participate in the oral part of the examination to consider and contribute to the debate about the evidence base for the open space standards.
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>372928  Mr Tom Gilbert-Wooldridge</td>
<td>English Heritage</td>
<td>Policy SAP10: Open Space Provision</td>
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**Comment ID:** SASub70  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective  

We welcome the reference in the draft policy wording to protecting existing open space, which complies with Policy EN1 of the Core Strategy. The criteria that proposals have to meet in order to develop existing open space would benefit from a reference towards the need to preserve historic environment features (as well as natural environment), as the current wording suggests a greater possibility that existing spaces could be redeveloped (including those that have national/local environmental designations). Without such reference, the DPD would be rendered unsound as it would not be effective or deliverable against historic environment issues. In terms of the Sustainability Appraisal, we would argue that Policy SAP10 and SA Objective K (Cultural Heritage) are compatible given that the protection of existing open spaces will benefit the historic environment.

**Changes to make DPD sound:**

We recommend that the final bullet point of the policy is reworded along the following lines:

“the site does not contain or support important or protected habitats, species and heritage assets”

**Participate at Examination:** No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 475706 Miss Clare Sterling
Lincolnshire Wildlife Trust

Agent: Lincolnshire Wildlife Trust

Consultation Point: Policy SAP10: Open Space Provision

Comment ID: SASub92
Type: Web

IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: Yes

Unsound because DPD NOT:

Changes to make DPD sound:

SAP 10 – open space provision
The Lincolnshire Wildlife Trust strongly supports this policy to protect, enhance and increase the open space resource. Open space, particularly accessible natural greenspace, is important to provide space for both wildlife and people. Connectivity of open space is essential to enable species to migrate across the landscape as the climate changes. We would recommend that the standard used to assess that there is sufficient accessible natural greenspace in an area is the Natural England Accessible Natural Greenspace Standard (ANGSt). ‘Nature Nearby – Accessible Natural Greenspace Guidance’ was published by Natural England in March 2010 and is available to download from the Natural England website.

Providing new open space - The Lincolnshire Wildlife Trust welcomes the requirement for new development to provide new natural greenspace. This would provide an excellent opportunity to create Biodiversity Action Plan priority habitats and therefore contribute towards achievement of BAP targets.

Protecting existing open space – We welcome the addition of the last bullet point to ensure that the potential presence of important or protected habitats or species is taken into account when determining whether or not development proposals should be permitted on existing open spaces.

Participate at Examination:
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>517670</td>
<td>Natural England</td>
<td>Policy SAP10: Open Space Provision</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub205  
**Type:** E-Mail

**IS DPD Legally Compliant:**
**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Justified

Natural England welcomes the key role that the recently completed South Kesteven Green Infrastructure Study has played in shaping the green infrastructure policies in these documents. Your authority should continue to use this as a baseline study and update where necessary in the future.

The natural environment provides us with ecosystem services, such as water purification, flood alleviation, the lessening of air pollution, urban cooling and space for recreation. The policy/supporting text should give increased prominence to the maintenance of natural processes and ecosystem services. GI is an essential delivery mechanism for the planning system to contribute towards the maintenance and enhancement of ecosystem services. Ecosystem services should be defined in the glossary.

**Changes to make DPD sound:**

The policy/supporting text should give increased prominence to the maintenance of natural processes and ecosystem services. GI is an essential delivery mechanism for the planning system to contribute towards the maintenance and enhancement of ecosystem services. Ecosystem services should be defined in the glossary.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
474396  Mr Gordon Smith

Agent

Consultation Point
Policy SAP10: Open Space Provision

Comment ID: SASub153
Type: E-Mail

Attached Files:

IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound:  No
Unsound because DPD NOT:

Does not reflect the more comprehensive list of facilities addressed in the Open Spaces Study 2009: namely standards for Sports Hall, Swimming pools, STP, Small community halls. This is necessary to inform on-site or off-site provision, or the development of a tariff. The conclusions of the 2009 Open Spaces Survey have not been used.

Changes to make DPD sound:
A strategy for implementation of new Open space and Green Infrastructure in the Deepings is warranted. If such a strategy was in place it way well influence the arrangement of land use in the allocated sites by for instance developing the locally popular idea of a green corridor activity zone or extension of the Peterborough Green Wheel around the town). The work will extend into adjoining districts.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>474396 Mr Gordon Smith</td>
<td></td>
<td>Policy SAP10: Open Space Provision</td>
</tr>
</tbody>
</table>

Comment ID: SASub143
Type: E-Mail

Is DPD Legally Compliant: No
Is DPD Sound: No
Unsound because DPD NOT: On open space, the use of standards is too reactive. It will not guide the spatial provision of new open space, merely its amount. Future open space and green infrastructure (GI) are important elements of the physical structure of the town. A full assessment of open space need has already been carried out by the Council, yet not apparently used. No site specific proposals have followed in the plan. There is no strategy to guide GI development beyond reactive development control criteria.

Changes to make DPD sound:

Participate at Examination:
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<th>Consultee</th>
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<th>Consultation Point</th>
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<td>527735</td>
<td>P &amp; B Lely</td>
<td>Policy SAP10: Open Space Provision</td>
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<tr>
<td></td>
<td>527734 Mr Dan Mitchell Barton Willmore</td>
<td></td>
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</tbody>
</table>

Comment ID: SASub214  
Type: E-Mail  
Attached Files:

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Justified; Effective

Policy SAP10, in similar fashion to policy AT1 of the AAP, places a blanket protection on existing allotment provision. This is despite the provision of allotments being in excess of recognised targets in the area and the proposal of a mechanism for large-scale developments to provide new allotment provision. [see comments in respect of Policy AT1 in attached]

**Changes to make DPD sound:**

**Participate at Examination:** Yes
<table>
<thead>
<tr>
<th>Consultee</th>
<th>Comment ID: SASub154</th>
<th>Type: E-Mail</th>
<th>Attached Files:</th>
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</thead>
<tbody>
<tr>
<td>474396 Mr Gordon Smith</td>
<td>IS DPD Legally Compliant:</td>
<td>Legal Compliance Reasons:</td>
<td></td>
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<tr>
<td></td>
<td>Is DPD Sound: No</td>
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<td>Unsound because DPD NOT:</td>
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<td>Changes to make DPD sound:</td>
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<td></td>
<td>No reference is made to the future of the area’s largest single space user, the Deepings Business and Enterprise college and its future development. This may well be a criticism of the College itself or the County Council.</td>
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<td></td>
<td>Participate at Examination:</td>
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### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tbody>
<tr>
<td>605225 Ms Jane Bateman</td>
<td></td>
<td>Paragraph (5.2.5)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub53  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** No  
**Legal Compliance Reasons:** See below

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified

I would question that there are no capacity issues with GP practices in Stamford given the number of houses currently being built.

**Changes to make DPD sound:**

**Participate at Examination:** No
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
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<tr>
<td>474396</td>
<td>Mr Gordon Smith</td>
<td>Paragraph (5.2.6)</td>
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<th>Comment ID</th>
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<tr>
<td>SASub155</td>
<td>E-Mail</td>
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**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:** No

**Unsound because DPD NOT:** Justified

The following phrase needs expansion: "there are reported to be no capacity issues within the Districts medical practices."

Further work may well be needed to support the development of a tariff, or to protect land for future expansion of the present health centre.

**Changes to make DPD sound:**

Phrase needs further justification

**Participate at Examination:**
Consultee: Annette Hewitson
Agent: Environment Agency

Consultation Point: Paragraph (5.2.8)

Comment ID: SASub83
Type: Web

IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

IS DPD Sound: No

Unsound because DPD NOT: Effective; Consistent with National Policy

The document has not taken the findings of the Detailed Water Cycle Study, November 2011, into account. As such some of the information in the DPD is not accurate and up to date. Also some of the site allocations (DE1a, DE1b and LSC1f) are phased to come forward in advance of the provision of the necessary foul water infrastructure that is needed to serve it. As such, these developments will not be deliverable within the phasing stated in the document and are contrary to Policy contained in PPS1, PPS12 and PPS23, which all require consideration of environmental capacity and environmental protection in decision making.

Changes to make DPD sound:
This paragraph requires updating to reflect the findings of the final Detailed Water Cycle Study, November 2011. It is suggested that bullet points 1, 2 and 4 from Page 121 of this Study are incorporated into this overview to give an up to date picture of the issues that need to be resolved prior to development taking place and likely timings:
"1. Growth in the Deepings. There is not capacity to treat additional wastewater at Deepings WwTW until a new permit is negotiated and obtained, and the technical requirements implemented - this could take at least 5 years.
2. Large scale development in Stamford until wastewater treatment upgrades are completed. Some growth can go ahead but this will be limited by Anglian Water meeting its sanitary levels at the works.
3. All development in Harlaxton is subject to a 5 year delay whilst wastewater treatment and consenting issues are resolved at Harlaxton WwTW. The small size and capacity at Harlaxton WwTW restricts even small scale development."

Participate at Examination: Yes

Insufficient capacity in the sewerage network has significant implication for the environment and compliance with the Water Framework Directive. Development should not be allowed to go ahead until adequate infrastructure is in place.
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<th>Consultee</th>
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<tbody>
<tr>
<td>605314</td>
<td>Annette Hewitson</td>
<td>Paragraph (5.2.9)</td>
</tr>
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</table>

**Comment ID:** SASub84  
**Type:** Web  
**Attached Files:**

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Effective; Consistent with National Policy

The document has not taken the findings of the Detailed Water Cycle Study, November 2011, into account. As such some of the information in the DPD is not accurate and up to date. Also some of the site allocations (DE1a, DE1b and LSC1f) are phased to come forward in advance of the provision of the necessary foul water infrastructure that is needed to serve it. As such, these developments will not be deliverable within the phasing stated in the document and are contrary to Policy contained in PPS1, PPS12 and PPS23, which all require consideration of environmental capacity and environmental protection in decision making.

**Changes to make DPD sound:**
This paragraph requires updating to reflect the findings of the final Detailed Water Cycle Study, November 2011. It is suggested that bullet points 3 and 5 from Page 121 of this Study are incorporated into this overview to give an up to date picture of the issues that need to be resolved prior to development taking place and likely timings:
1. Commercial development at Bourne (B1b 7 part of ExE B4) are subject to 5 year delay to provide sewerage.
2. All development in Long Bennington is subject to a minimum 5 year delay to resolve sewerage constraint. Any additional development, even small scale, in Long Bennington will increase the risk of, and be vulnerable to, sewer flooding until the strategic solution is implemented and so would be inadvisable.

**Participate at Examination:** Yes

Insufficient capacity in the sewerage network has significant implication for the environment and compliance with the Water Framework Directive. Development should not be allowed to go ahead until adequate infrastructure is in place.
IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound:
Unsound because DPD NOT:

Changes to make DPD sound:
New footpaths and cycleways should be resisted in general principle. These tend to be part of the general process of creeping urbanisation of the landscape which has disfigured Lincolnshire so much in recent years; they can severely detract from the rural character of a village.

Participate at Examination:
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<tr>
<th>Consultee</th>
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<tbody>
<tr>
<td>497285 Mr Owen Walters</td>
<td>Highways Agency</td>
<td>Paragraph (5.2.10)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub163  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:**  
The Agency welcomes the reference to large sites, such as those at Stamford, requiring comprehensive Transport Assessments. It is, however, considered that the statement in Section 5.2.11 that ‘the Highways Agency has confirmed that the recent upgrades to the A1 trunk road mean that the amount of development anticipated is not expected to have a significant impact on the operation of the road’, requires some qualification. Whilst the growth in the District may not significantly affect the operation of the A1 mainline, development (on an individual and cumulative basis) has the potential to have localised impacts, particularly for individual junctions.

**Changes to make DPD sound:**  
The Agency recognises that growth in the towns of South Kesteven, such as Stamford, represents the most sustainable option for development due to the availability of public transport, opportunities for walking and cycling and the local provision of employment, retail and other services. However, it is important that, even where this is the case, remedial traffic impacts are appropriately considered and, where necessary, mitigation measures identified together with their deliverability.

The Site Allocations and Policies DPD refers to the Infrastructure Delivery Schedule included within the Core Strategy which identifies the critical infrastructure necessary to serve new development during the plan period; stating that this ‘has been updated in the light of more detailed information available’. It would be helpful if the submission version of the DPD could include the details of the Infrastructure Delivery Schedule amendments, particularly in respect to transport and how this relates to specific sites and allocations.

**Participate at Examination:**
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
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<tr>
<td>26121</td>
<td>372868</td>
<td>Proposals Map Table 1</td>
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<tr>
<td>Mr D Fabris</td>
<td>Robert Doughty</td>
<td></td>
</tr>
<tr>
<td>Mouchel Business Services Limited</td>
<td>RDC</td>
<td></td>
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</table>

**Comment ID:** SASub136  
**Type:** E-Mail  
**Attached Files:** SASub135 and 136[1].pdf; SASub135 and 136[2].pdf

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified  
The DPD fails to allocate the site of the Aveland High School site in Billingborough. The reasons as to why the land should be allocated are set out in the accompanying representation document.

**Changes to make DPD sound:**
The Aveland High School site, identified on the plan that accompanies the Representation, should be allocated for housing on the Billingborough Inset Map.

**Participate at Examination:** No
Consultee
Ms Jane Bateman

Agent

Consultation Point
Proposals Map Table 1

Comment ID: SASub54

Type: Web

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Justified

Changes to make DPD sound:
STM1b - this map does not show the current building that has been approved and is in the process of being built which would be helpful. Also I understand Rutland County Council are considering building in this area on their land which will have a big affect on Stamford and is not referred to.
STM2a - the employment allocation north of Barnack Road is considerable and I would oppose the scale of this proposal on land near the river and Burghley House,
STM1 Housing - I would question the need to build on a greenfield site and the references to reducing the need to travel by car, accessibility by public transport so public transport in Stamford is not good in terms of frequency of service by both buses and trains.
STM2 Employment - again I question the need to build on a greenfield site and the references to employment sites being on the edge of town to reduce travel by private car, journeys to other towns and near the public transport network. Stamford has a limited public transport network with no interchange, a limited bus and train service. Far more will need to be done to encourage less car use.
STM3 Mixed use urban extension - again I question the need to build on a greenfield site. The size of this development is too much given the other building proposed for the town or in the process of being built. The effect of current building is not known yet in terms of impact on existing infrastructure and increase car journeys. This area is in a prominent position in terms of being a gateway to Stamford and it's impact on the town will be considerable. I do not support this location for development.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<th>Consultee</th>
<th>Agent</th>
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<tbody>
<tr>
<td>606978</td>
<td>Mr Robert Jenkinson</td>
<td></td>
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<tr>
<td>26002</td>
<td>Escritt Barrell Golding</td>
<td>Proposals Map Table 1</td>
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</table>

Comment ID: SASub225

Type: Letter

Attached Files:

IS DPD Legally Compliant: Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified

The conclusion for not including Site reference GGON02 pt OS 0006 states that there are no suitable access points. Planning permission for affordable housing has recently been approved on the adjoining land to the south (Site reference GGON03). The approved scheme includes provision for access to GGON02. It would also be possible to construct a new access onto the B1174 not only to serve the site but also to improve the junction with Belton Lane. The Assessment Constraints refer to a sewer crossing the site which neither we or our client are aware of - if it exists this would appear to be a benefit! Rainwater discharge would not be an insurmountable problem as the site is on Limestone. A drainage scheme incorporating water harvesting, soakaways and some discharge to the Toll Bar Drain to the north could be designed.

Changes to make DPD sound:

We propose inclusion of GGON02. A well designed scheme on this land would enhance the visual character of the village and it would have the potential to deliver significant highway improvements.

Participate at Examination: No
# Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>372869 Mr and Mrs Geoff Hix</td>
<td>372868 Robert Doughty RDC</td>
<td>Proposals Map Table 1</td>
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</table>

**Comment ID:** SASub138  
**Type:** E-Mail  
**Attached Files:** SASub137 and 138.pdf

**IS DPD Legally Compliant:** Yes  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified

The DPD fails to allocate land in Castle Bytham despite finding that land is suitable for development through the evaluation of SHLAA sites (notably DPD site reference CAS06 SHLAA site referene SK/CAS/04). In addition, other land under the control of the objector (DPD site reference CAS07 and CAS08) should also be considered for allocation to enable the LSC of Castle Bytham to develop.

**Changes to make DPD sound:**  
Sites CAS06, CAS07 and CAS08 should be included as housing allocations on the Castle Bytham Inset Map.

**Participate at Examination:** No
IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: No
Unsound because DPD NOT: Justified
The DPD fails to identify land off South Road, Bourne for roadside services and other uses. The land has had a number of planning approvals for development in the past and discussions are ongoing with the Planning Authority about proposals to develop the land.

Changes to make DPD sound:
The DPD should refer to the land known to be available off South Road, Bourne, which is essential to deliver the road connection referred to in 3.2.9 of the DPD, and identify the land on the Proposals Map, as per the accompanying location plan.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: Mr J Wherry
Agent: Mr Mike Sibthorp
Consultation Point: Proposals Map Table 2

Comment ID: SASub99
Type: Web

IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

Is DPD Sound: No
Unsound because DPD NOT: Justified; Effective

Our comments relate to the proposed deletion of the Elsea Park residential allocation. H3.15.
The site allocation is not the same as the Elsea Park planning application. In the north-eastern corner of the H3.15 allocation, south of the Stamford Homes development site, and west of Southview, is a triangular area of land in my client's ownership. It is my understanding that this land was not comprised with the Elsea Park planning application, but is nevertheless allocated for residential development meant. We consider that this part of the allocation should be retained as a site for residential development. The land is accessible, either via Elsea Park, or from the north or east. Removal of the allocation in respect of this section of land is not justified.

Changes to make DPD sound:
As above. Retain that element of the H3.15 that does not form part of the Elsea Park permission as a housing allocation.

Participate at Examination: No
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee  | Agent  | Consultation Point
--- | --- | ---
294235 Mr Mark Mann | Savills | Proposals Map Table 2

Comment ID: SASub224  
Type: Letter  
Attached Files: SASub220-224.pdf

IS DPD Legally Compliant: 
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified; Consistent with National Policy

In not identifying the whole or part of STAM14 as a site for development and in effect de-allocating the site, the Council will exacerbate the problems associated with developing this site and any form of environmental improvement/reclamation of this site. We suggest that it would be entirely consistent with the Core Strategy to retain this site as an allocation, either as it is as an employment site, or to enhance its attractiveness and its chances of delivery for other higher value uses. At the time of the Local Plans adoption in 1995, the Council considered that the development of this site would not have a serious effect upon the form, character and setting of the town. We agree with that assessment and we are not aware of anything that has changed in the area surrounding the site to change that view. [see attached letter for full representation]

Changes to make DPD sound:

We suggest that to make the Plan sound that the Council re-examine the assessment of the urban extension sites and in particular consider a smaller extension to the east based upon the existing employment allocation E2.3 in order to compare sites of a similar size. It is considered that this revised assessment will suggest that the site to the east is more appropriate than the other options and also that it will bring forward the redevelopment of previously used site which has a detrimental impact on the environment.

If the above reassessment fails to support the site as an urban extension, we would advocate the retention of the current employment allocation. This site has been considered suitable for such development previously by the Council and we see no justification to change this position. There are difficulties with delivery, but this is typical of a previously developed site. Development in the near future is likely on the adjacent site and this could facilitate the development of site STAM14. This employment allocation of a brownfield site should take precedence over the allocation of a greenfield site.

Participate at Examination: Yes
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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tr>
<td>26386 Miss Joyce Stevenson</td>
<td></td>
<td>Proposals Map Table 2</td>
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</table>

**Comment ID:** SASub134  
**Type:** Letter  
**Attached Files:**

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:**  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**  
Please note that Map 17 (page 46) identifies "Northorpe - Allocations to be Deleted". As this is clearly a map of Thurlby, identifying sites H5.41, H5.42 & H5.43 in the Parish Thurlby, this should be corrected to "Thurlby - Allocations to be Deleted".

**Participate at Examination:**
I must advise that we are very concerned regarding the timing of this document and its implications for the provision of additional housing in Market Deeping for at least the next five years.

It is recognised that the submission DPD (paragraph 3.3.15) states that there are constraints to the overall capacity of the WwTW in the initial phase of the plan period. There is a real and justifiable concern that the implications of the WCS appear not to have been known until November 2011. This has implications for the credibility of the evidence base used to underpin the remainder of this document.

South Kesteven cannot demonstrate a five year deliverable supply of housing and the embargo on housing in Market Deeping arising from the WCS will clearly exacerbate this situation, especially as the 100 dwellings envisaged to be delivered in 2011-2016 will not now come forward. There are already identified constraints in Stamford and it is questionable as to whether the objectives of the Core Strategy can be fulfilled. The impacts of the WCS on the DPD will also have implications for the delivery of housing identified at Policy H1 of the Core Strategy and the supporting advice contained within para 5.1.7. The ramifications of the above on the DPD is significant and it leads to the conclusion that this DPD is unsound as it is clearly not in accordance with the adopted policies of the Core Strategy and will not enable the policies of this document to be fulfilled.

My client's drainage consultant is currently attending a working group looking at foul and surface water drainage issues with SK and specifically at Market Deeping in the light of the WCS findings. Due to the lateness of this meeting I would like to reserve our position to provide further comments if technical solutions arise from this meeting which impact on both the WCS and the DPD.

**Changes to make DPD sound:**

**Participate at Examination:** Yes

This WCS has resulted in fundamental changes to our perception of the DPD, and my clients would wish to appear at the examination and assess and comment on the implications of WCS on the final version of the DPD.
Consultee Comments

Consultee: 487941 Mr M Newton
Agent: Boyer Planning
Comment ID: SASub250
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective

Reasons why not Justified:
Paragraph 5.2.8 (as amended by the Schedule of Minor Changes to the DPD of December 2011) states the Water Cycle Study (WCS) concludes that:
“Upgrade of wastewater treatment required in Stamford to accommodate large scale development”.
In our view, the DPD is not justified in drawing this conclusion from the WCS.
Our specific concern is the impact of the statement in paragraph 5.2.8 on the development at land between Empingham and Tinwell Roads in Stamford, proposed for allocation in Policies STM1, STM2 and STM3 (the Empingham Road site). This is the major housing allocation for Stamford proposed in the DPD and the reference to “large scale development” in para 5.2.8 could be construed as constraining this allocation in particular.
We have evidence to demonstrate there is sufficient wastewater treatment capacity at Stamford to accommodate all the development proposed in the DPD.
Further, we consider the reference to “large scale development” to be imprecise.
Table 3.6 in part 1 of the WCS demonstrates that headroom at the Stamford Waste Water Treatment Works (Stamford WwTW) is more than sufficient to meet residential growth requirements at Stamford.
In response to site specific enquiries, Anglian Water has confirmed that sufficient capacity exists currently at the Stamford WwTW to accommodate the development of the Empingham Road site.
Anglian Water state:
“The foul drainage from this development is in the catchment of Stamford Sewage Treatment Works that will have available capacity for these flows.”
Anglian Water also confirm that:
“...we do not currently anticipate the need for a phased approach to development nor do we envisage upgrades to the system as a result of this development going ahead.”
Accordingly, the development may proceed and will fall within the consented parameters of this WwTW.
The WCS outlines that future requirements set by the Water Framework Directive may result in upgrading of the Stamford WwTW to reduce the level of phosphates that are discharged to the River Welland. Whilst this is a valid point and one which must be considered, any such requirements are routinely phased to ensure that enhancements required at treatment facilities are incorporated into the cyclical water industry Asset Management Plan process. Accordingly,
Site Allocation DPD: Submission October 2011 - Consultee Comments

where facilities are presently operating within consented limits, there is no practical reason to delay development due to potential future enhanced treatment criteria.

Overall, we consider that the evidence does not support the statement in paragraph 5.2.8 about wastewater treatment in Stamford in relation to large scale development.

Changes to make DPD sound:
Delete the second bullet point from paragraph 5.2.8 (as amended by the Schedule of Minor Changes to the DPD)

Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to demonstrate that changes are necessary to the wording of the DPD on this issue, why the recommended wording is appropriate and to set out the evidence that supports the change.
Consultee: Annette Hewitson  
Agent: Environment Agency  
Consultation Point: Water Cycle Study  

Comment ID: SASub260  
Type: E-Mail

IS DPD Legally Compliant: 
Legal Compliance Reasons: 

Is DPD Sound: 
Unsound because DPD NOT: 

Changes to make DPD sound: 
We welcome the proposed changes and I can confirm they would be sufficient to resolve our representation on the following paragraphs: 3.3.15, 3.4.1.4, 5.2.8, 5.2.9. 
Our outstanding representations relate to the phasing of site allocations (DE1a, DE1b and LSC1f), which we discussed at our meeting on 22 November 2011. I hope we will be able to deal with these through a statement of common ground, for submission into the Inquiry process. 

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee
603266  Mrs Jane Evans
Long Bennington Parish Council

Consultation Point
Water Cycle Study

Comment ID: SASub243
Type: E-Mail
Attached Files:

IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound:
Unsound because DPD NOT:

Changes to make DPD sound:
The Parish Council would like to following comments adding to the earlier representation:
The report non-technical summary of the water cycle study states “potentially minimum of 5 years required to resolve sewerage constraint. This is not simply a local site specific problem. The whole of Long Bennington is vulnerable to sewer flooding and a strategic solution is required. All parties should be made aware of this situation when considering planning applications”.
I would also like to draw your attention to the WCS amendments to the schedule in respect of paragraph 3.4.1.4:
The Parish Council feel quite strongly that the comments in this report increase the concerns in relation to development in Long Bennington and in particular this relatively large site on which there has already been an application for development for 35 dwellings.
It would be very much appreciated if the above comments are taken into consideration alongside our earlier representations.

Participate at Examination:
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>549651 Mr William Strain</td>
<td>607499 Mr Raymond F Kilsby</td>
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**Comment ID:** SASub258  
**Type:** E-Mail  
**Attached Files:** Kilsby-Strain WCS.pdf

**IS DPD Legally Compliant:**  
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified; Effective

We believe and submit that the findings and conclusions of this Practice's earlier Statement (dated 15 November 2011) are endorsed by, and given weight and emphasis by, the terms and analysis of this WCS. Consequently this Study reinforces our contention that the Plan is not sound because its provisions are neither fully justified nor effective. In advising upon the "Strategy for Proposed Development" as it applies to Stamford the following alternatives are advanced: "... it is recommended that either the strategic site or the individual smaller sites are brought forward ..."

At the same time ADD42 is identified as a "Preferred Site" being one of 9 within the total number of 27 sites examined. The District Council identify ADD42 (STM1a) as one of two sites for release and development over the 2011-2016 period. We have demonstrated the "tightness" of residential land supply over that period and highlighted the inescapable concomitant that an additional margin of supply is needed, wholly justified and should be welcomed - particularly here where that additional supply would comprise a logical, coherent and wholly unobjectionable extension of the adjacent resident allocation. In relation to the first "limb" of the strategy, the "strategic site" referred to (STM1e anticipated provision 400) is: phased for development 2016-2026, heavy score in Study, neither a realistic nor appropriate short term solution to contemplate, given the significant capital expenditure required to overcome the constraints identified and the time likely to be required to do so.

Hence we are led to the compelling conclusion that the appropriate strategy to pursue here - and one which is essential to render the Plan sound and effective - is to ensure that the identified smaller sites with minimal constraints are brought forward for early development, and that allocation STM1a is enlarged and extended (as our Clients’ representations seek) as part of that process.

[full representation attached]

**Changes to make DPD sound:**

ensure that the identified smaller sites with minimal constraints are brought forward for early development, and that allocation STM1a is enlarged and extended (as our Clients’ representations seek) as part of that process.

**Participate at Examination:** Yes
Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>517670</td>
<td>Natural England</td>
<td>Water Cycle Study</td>
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**Comment ID:** SASub256  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**

**Legal Compliance Reasons:**

**Is DPD Sound:**

**Unsound because DPD NOT:**

**Changes to make DPD sound:**

In view of the new information Natural England have the following comments to make:

The Water Cycle Study forms an important part of the background evidence base which is prepared to inform the Core Strategy. The study has assessed the impact of the proposed growth on water and has helped to identify whether there is capacity or whether infrastructure improvements are required to achieve the LDF objectives.

Natural England hope where possible the results of the WCS will help to influence housing allocations to take account of the constraints and influence the policies within the Site Allocation and Policies DPD to positively address the water issues outlined in the report. Policies should promote flood resilient and resistance measures to mitigate the impacts of flooding.

**Green Infrastructure**

The report highlights that surface water flooding is a major issue in the district and surface water management is recommended including the use of Sustainable Drainage Systems (SuDS).

Natural England support the use of Sustainable Drainage Systems (SuDS) which can help to prevent and manage flooding whilst offering additional benefits such as rehabilitating landscape character, enhancing biodiversity and offering opportunities for recreation and helping to mitigate and adapt to the impacts of climate change.

As identified in the report we recommend that proposals for SuDS should be linked to the Green Infrastructure network and therefore reference should be made to the GI Strategy in order to maximise the opportunity to create an enhanced multifunctional network of green spaces across the district.

**Participate at Examination:**
# Site Allocation DPD: Submission October 2011 - Consultee Comments

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<tr>
<td>497567  Mr Andrew Russell-Wilks</td>
<td>Aner Spa Midlands Ltd</td>
<td>Water Cycle Study</td>
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**Comment ID:** SASub242  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:** No  
**Legal Compliance Reasons:**  
These representations are supplementary to those made in November 2011 and they relate solely to the issues raised by the publication of the Water Cycle Study in Dec 2011.

**Is DPD Sound:** Yes  
**Unsound because DPD NOT:**

**Changes to make DPD sound:**
We consider the DPD to be sound and these comments are in support of the DPD. The inclusion of site LSC1b is welcomed and forms a logical extension to the settlement.  
Our client's drainage engineers have carefully studied the findings of the AMEC Water Cycle Study dated Nov 2011 and have concluded that in relation to the development site in Colsterworth LSC1b:  
*That the Colsterworth LSC1b site can be satisfactorily drained for both foul and storm water.*  
*That there is nothing revealed by the Water Cycle Study that would prevent it being delivered.*  
*That the landowners will follow the site specific advice in the study and “seek appropriate pre-planning technical support to identify and resolve drainage/surface water management issues”.*  
*That it will be possible to accelerate the conservative programme set out in the Water Cycle Study.*

**Participate at Examinations:** Yes  
To ensure that the Inspector is fully aware of the deliverability of this site.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 487941 Mr M Newton
Boyer Planning

Consultation Point: Water Cycle Study

Comment ID: SASub251
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified; Effective

Reasons why it is not justified:

With regard to paragraph 3.5.1 and 3.5.1a, we are concerned that there is no clear justification for the allocation of specific sites to particular five-year phases, based on site characteristics or timescales for delivery.

Whilst there may be a rationale for phasing the delivery of sites in certain circumstances, the phasing provisions of this DPD appear arbitrary. Whilst some sites could be “constrained in the early part of the plan period by the capacity of existing infrastructure and the need for improvements prior to development” (para 3.5.1) this does not provide a basis for the phasing provisions in Policy STM1 for example, as there is no evidence that site STM1e carries such constraints or why this particular site cannot be released in the 2011-2016 period while sites STM 1a and STM 1b can be released in this period.

We consider that the provision for phasing in Section 3.5 does not satisfy a key question raised in the Inspectorate’s soundness guidance in relation to the test of justification: i.e. “Is the content of the DPD justified by the evidence? What is the source of the evidence? How up to date is it and how convincing is it?”

Without proper justification, the provision for phasing in section 3.5 of the DPD will be unnecessarily restrictive in terms of the delivery of development. More specifically, we object to a statement in paragraph 3.5.1a which is the additional paragraph proposed in the Schedule of Changes issued in December 2011 (schedule of changes) i.e. that Stamford requires “the consideration and implementation of a strategic solution to increase the capacity of either the sewerage network or Wastewater Treatment Works”. On the basis of information supplied by Anglian Water (set out in detail in our representations on STM1) we consider that Stamford does not require such a “strategic solution”.

However, without prejudice to our objections above (and our objections to the proposed phasing in policies STM 1e and STM 3), we welcome the proposed inclusion of additional wording to this paragraph in the schedule of changes, specifically:

• That the phasing indicated in the policies will be subject to “maintaining a continuous five year supply of deliverable sites”
• That “if delivery constraints can be satisfactorily addressed, allocated sites could be released earlier, if it is demonstrated that the site is needed to maintain a five year supply”

The statement in paragraph 3.5.2 that “Planning permission will not normally be granted for allocated housing sites earlier than 12 months before the beginning of the phase identified in the allocating policy” appears to set an arbitrary constraint on when planning permission will be granted in relation to each phase. There is no clear basis or justification for the 12 months referred to.
We consider that it would be justifiable and appropriate to grant permission for sites in advance of 12 months before the beginning of each phase in view of the long lead in time to the development process, including the time taken to finalise S106 agreements and site preparation. It would be particularly inappropriate to restrict outline planning permissions to this 12 month rule as it can, in some cases, be a number of years before planning permission is granted for reserved matters and could prevent sufficient delivery of housing within the identified phase.

Reasons why it is not effective
Section 3.5 is not “effective” as it does not allow a sufficient degree of flexibility.
Paragraph 3.5.3 states that “if during the plan period it is clearly demonstrated that insufficient housing development has taken place, that allocated housing sites have not been delivered in accordance with the phasing strategy and that there is not a five year supply of deliverable housing land, consideration will be given to re-prioritising the phasing of sites.”
This is not effective because it is not clear how the re-prioritising of sites is to be achieved within the development plan process. The delivery mechanism and timescale for the implementation of this re-prioritisation is not clear.

Changes to make DPD sound:
We consider that references to limiting the delivery of development to five year phases and preventing the grant of planning permission for allocated sites more than 12 months before the beginning of the relevant phase, should be deleted. References to re-prioritising sites should also be deleted whilst there is no clear mechanism for this process.
The statement in the additional paragraph 3.5.1a (in the Schedule of Changes issued December 2011) that “Stamford and the Deepings require the consideration and implementation of a strategic solution to increase the capacity of either the sewerage network or Wastewater Treatment Works” should be deleted insofar as it relates to Stamford.

Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to demonstrate that the phasing provisions set out in Section 3.5 are not justified or effective, which impacts upon the soundness of the DPD.
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee: 487941  Mr M Newton
Boyer Planning

Agent:

Consultation Point: Water Cycle Study

Comment ID: SASub254
Type: E-Mail
Attached Files:

IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified

We consider that paragraph 5.2.9 is unsound because it is not “justified” in its current form (for reasons set out in our representations to policies STM 1 and STM 3) but that the proposed changes (as set out in the Schedule of Minor Changes to the DPD of December 2011) could address this if there is a further minor change in wording.

Reasons why not Justified:
Paragraph 5.2.9 in the form proposed in the original submission draft DPD states:
“Sewerage network issues have been identified for Stamford, where planned growth is likely to exceed the capacity of the infrastructure and require significant infrastructure improvements”.

The proposed revised wording states:
“Sewerage network issues have been identified for Stamford and Long Bennington. In Stamford a UPM is recommended to detail the constraints and propose the most appropriate solution”

We support the proposed change because it removes reference to a statement that growth planned by the DPD cannot be supported by the capacity of the infrastructure. That statement could have rendered the DPD unsound as it suggests the DPD would not be capable of delivering its own proposals.

We believe the reference to “UPM” in the revised wording refers to an Urban Pollution Management model. There is a further reference to this in paragraph 3.1.14 (as proposed to be changed in the in the Schedule of Minor Changes to the DPD of December 2011). This states:
“It is recommended that an Urban Pollution Management (UPM) model is undertaken to properly assess the constraints to the network. Development in the town may be required to contribute to improvements to the network”.

We consider that these references to a UPM model arise from the need to manage the impact of potential Combined Sewer Overflows (CSOs). They do not suggest any fundamental constraint that has to be addressed before development can proceed. The UPM concerns measures that can be taken in parallel with the development process and we consider this point should be made clear in the revised wording of paragraph 5.2.9.

Changes to make DPD sound:
After the words “In Stamford a UPM is recommended to detail the constraints and propose the most appropriate solution” insert: “….as part of the process of managing the impacts of development. It does not imply any constraint on the timing or delivery of the Stamford site allocations”.

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Participate at Examination: Yes

We consider it necessary that we participate in the oral part of the examination to demonstrate that changes are necessary to the wording of the DPD on this issue, why the recommended wording is appropriate and to set out the evidence that supports the change.
IS DPD Legally Compliant: Yes
Legal Compliance Reasons:

IS DPD Sound: No
Unsound because DPD NOT: Justified; Effective

The following statement is made in paragraph 3.1.14:
“Modelling of wastewater transition in the town reveals that there are constraints within the existing sewer network. Improvements will be required to the network to accommodate additional flows. This work will impact upon the phasing and delivery of large allocations.”

Although the results of the Final Water Cycle Study (WCS) indicate a constraint to growth in Stamford, the model has not fully considered a range of progressive growth scenarios together with the impacts and interventions available to address them as development occurs.

We consider it is not justified for the DPD to conclude that works are necessary to accommodate additional flows or that these works will impact on the phasing and delivery of sites. The methodologies used in the WCS to appraise the likely impacts cannot be relied upon to inform or justify delivery constraints and phasing requirements at particular sites.

Our specific concern is the impact of the judgements in paragraph 3.1.14 on the timing of development at land between Empingham and Tinwell Roads in Stamford, proposed for allocation in Policies STM1, STM2 and STM3 (the Empingham Road site). The wording in paragraph 3.1.14 suggests that “improvements would be required to the network to accommodate additional flows” before this allocated development can proceed and “that these works will impact on the phasing and delivery” of the site.

These conclusions are not consistent with appraisals completed by Anglian Water specifically for the Empingham Road Site (see Appendix to this representation). Following the completion of modelling for the Empingham Road site, Anglian Water states:

“The sewerage system, at present, has available capacity for gravity flows from the proposed development site.”

In its appraisal, Anglian Water has also indicated three suitable points of connection that can accommodate the full extent of the development and ensure an appropriate on-site drainage strategy can be formulated for the disposal of foul flows.

The information provided, which can be found within the Appendix, provides details of the investigation that has been completed in relation to foul drainage capacity for the Empingham Road site. The results demonstrate that sufficient capacity is present within the network and that no reinforcements will be required to accommodate the development. Another statement by Anglian Water, also contained within the Appendix, demonstrates this further:

“The current situation is that there is sufficient capacity within the existing network to receive foul flows from the proposed development on land West of Stamford as and when required, as such, we do not currently anticipate the need for a phased approach to development nor do we envisage upgrades to the...
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system as a result of this development going ahead.”
Consequently, Anglian Water indicates there is available capacity to accommodate development within the existing network without the requirement for upgrading / reinforcements or phasing of development.
The infrastructure works necessary to deliver the Empingham Road site can be provided as part of the development proposals. There appears to be no evidence that specific requirements for phasing are necessary against allocation of this site. From this evidence, we conclude that the Empingham Road site may proceed without phasing constraint.
Although the points made above relate specifically to the Empingham Road site, they cast doubt on the general applicability of the constraints to development in Stamford referred to in paragraph 3.1.14. We conclude that the statements in paragraph 3.1.14 are not justified and could render the DPD unsound.
The Schedule of Minor Changes to the DPD arising from the final Water Cycle Study adds the following words to paragraph 3.1.14:
“It is recommended that an Urban Pollution Management (UPM) model is undertaken to properly assess the constraints to the network. Development in the town may be required to contribute to improvements to the network”.
We do not dispute the recommendation that a UPM model is undertaken. However, we consider that this recommendation arises from the need to manage the impact of potential Combined Sewer Overflows (CSOs). It does not suggest any fundamental constraint that has to be addressed before development can proceed. It concerns measures that can be taken in parallel with the development process and this should be made clear in the text of paragraph 3.1.14.
Reasons Not Effective
We consider that paragraph 3.1.14 is not effective as it imposes constraints on the delivery of the DPD. In our view, it fails to meet the key question set out in the Inspectorate’s Soundness Guidance: “Have the infrastructure implications of the strategy/policies clearly been identified?”
There is a pressing need for additional market and affordable housing in Stamford, and for additional employment land. Paragraph 3.1.14 indicates constraints that could impact on the ability of the DPD to meet these needs. We consider:
• Any evidence of constraints must be balanced against the overall need for development and the need for development to be brought forward at the earliest possible date to maintain housing and employment land supply
• In the light of these pressing housing and employment land needs, the emphasis of the DPD should, wherever possible, be on addressing constraints in parallel with the development process, rather than setting out requirements that must be met before development can proceed.
Changes to make DPD sound:
1) Change to paragraph 3.1.14 (penultimate sub para):
Delete the sentence “Modelling of wastewater transition in the town reveals that there are constraints within the existing sewer network. Improvements will be required to the network to accommodate additional flows. This work will impact upon the phasing and delivery of large allocations.”
This change will remove the reference to the impact of wastewater transition on phasing and delivery that we consider to be not justified.
2) Change to paragraph 3.1.14 (penultimate sub para):
After the additional wording proposed in the Schedule of Minor Changes to the DPD concerning the recommendation for a UPM, insert: “The UPM is part of the process of managing the impacts of development and does not imply any constraint on the timing or delivery of the Stamford site allocations”.
Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to demonstrate that changes are necessary to the wording of the DPD on this issue, why the recommended wording is appropriate and to set out the evidence that supports the change.
IS DPD Legally Compliant: Yes

Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT: Justified

We are concerned that there is no clear justification for the allocation of specific sites to particular five-year phases in this policy, based on site characteristics or timescales for delivery.

The provision for phasing within this section does not satisfy one of the key questions raised in the Inspectorate’s soundness guidance in relation to the test of justification: i.e. “Is the content of the DPD justified by the evidence? What is the source of the evidence? How up to date is it and how convincing is it?”

The supporting text for Policy STM1, at paragraph 3.1.2.2, (as amended by the Schedule of Minor Changes to the DPD) states that “the phasing of sites has been influenced by evidence relating to infrastructure constraints, particularly wastewater infrastructure, which will require additional modelling and improvement”.

This statement does not explain or justify why some sites are allocated to a 2011-2016 phase while others are allocated to a 2016-2021 phase or what distinction is to be made between them in terms of waste water infrastructure constraints.

Our specific concern is the lack of justification for the phasing of land between Empingham and Tinwell Roads under reference STM1e (the Empingham Road site) within the period 2016-2021.

The phasing of the Empingham Road site within the 2016-21 period is not consistent with appraisals completed by Anglian Water specifically for the proposed development of the site (see Appendix to this representation). These appraisals cover both waste water infrastructure and the waste water network and the results are outlined below under these headings.

Waste Water network

Following the completion of modelling for the Empingham Road site, Anglian Water states:

“The sewerage system, at present, has available capacity for gravity flows from the proposed development site.”

In its appraisal, Anglian Water has also indicated three suitable points of connection that can accommodate the full extent of the development and ensure an appropriate on-site drainage strategy can be formulated for the disposal of foul flows.

The information provided, which can be found within the Appendix, provides details of the investigation that has been completed in relation to foul drainage capacity for the Empingham Road site. The results demonstrate that sufficient capacity is present within the network and that no reinforcements will be required to accommodate the development. Another statement by Anglian Water, also contained within the Appendix, demonstrates this further:

“The current situation is that there is sufficient capacity within the existing network to receive foul flows from the proposed development on land West of
Site Allocation DPD: Submission October 2011 - Consultee Comments

Stamford as and when required, as such, we do not currently anticipate the need for a phased approach to development nor do we envisage upgrades to the system as a result of this development going ahead.”

Consequently, Anglian Water indicates there is available capacity to accommodate development within the existing network without the requirement for upgrading / reinforcements or phasing of development.

Any infrastructure works necessary to deliver the Empingham Road site can be provided as part of the development proposals. There appears to be no evidence that specific requirements for phasing are necessary against allocation of this site. From this evidence, we conclude that the Empingham Road site may proceed without phasing constraint. It is our submission that the phasing of the Empingham Road site to the 2016-2021 period is not justified.

We note the reference to the need for additional modelling in 3.1.2.2. We understand this refers to the recommendation in the Water Cycle Study (WCS) that an Urban Pollution Management (UPM) model be undertaken to assess constraints to the network.

Whilst there may be a case for additional modelling, it does not follow that this justifies the phasing of the proposed allocations at Stamford. We consider that any additional modelling and improvement to the network, should this prove necessary, can be carried out in parallel with the development as part of the development process. It need not delay the development and does not warrant any provision for phasing.

We do not dispute the recommendation that a UPM model is undertaken. However, it does not suggest any fundamental constraint that has to be addressed before development can proceed.

Waste Water Treatment

Table 3.6 in part 1 of the WCS demonstrates that headroom at the Stamford Waste Water Treatment Works (Stamford WwTW) is more than sufficient to meet residential growth requirements at Stamford.

In response to site specific enquiries, Anglian Water has confirmed that sufficient capacity exists currently at the Stamford WwTW to accommodate the development of the Empingham Road site.

Anglian Water state:

“The foul drainage from this development is in the catchment of Stamford Sewage Treatment Works that will have available capacity for these flows.”

Anglian Water also confirm that:

“...we do not currently anticipate the need for a phased approach to development nor do we envisage upgrades to the system as a result of this development going ahead.”

Accordingly, the development may proceed and will fall within the consented parameters of this WwTW.

The WCS outlines that future requirements set by the Water Framework Directive may result in upgrading of the Stamford WwTW to reduce the level of phosphates that are discharged to the River Welland. Whilst this is a valid point and one which must be considered, any such requirements are routinely phased to ensure that enhancements required at treatment facilities are incorporated into the cyclical water industry Asset Management Plan process. Accordingly, where facilities are presently operating within consented limits, there is no practical reason to delay development due to potential future enhanced treatment criteria.

Overall, we consider that the phasing provisions in Policy STM1 are not justified and, for this reason, are not sound. Moreover, there is no justification, in terms of site characteristics, to allocate specific sites to different phases.

Cont/……

Reasons Not Effective
Site Allocation DPD: Submission October 2011 - Consultee Comments

We consider that the phasing provisions within Policy STM1 are not effective as they impose constraints on the delivery of the DPD. As a consequence, the DPD fails to meet the key question set out in the Inspectorate’s Soundness Guidance: “Have the infrastructure implications of the strategy/policies clearly been identified?”

There is a pressing need for additional market and affordable housing in Stamford, and for additional employment land. The phasing in Policy STM1 is a constraint that could impact on the ability of the DPD to meet these needs. We consider:

- Any evidence of constraints must be balanced against the overall need for development and the need for development to be brought forward at the earliest possible date to maintain housing and employment land supply
- There is clear need, in terms of housing and employment land supply in Stamford, and in the District as a whole, for the STM1e allocation to be developed as soon as possible in the development plan period
- In the light of these pressing housing and employment land needs, the emphasis of the DPD should, wherever possible, be on addressing constraints in parallel with the development process, rather than setting out requirements that must be met before development can proceed.

Changes to make DPD sound:

We consider that the phasing provisions within the final column of the table in Policy STM1 should be deleted.

We consider that paragraph 3.1.2.2 which outlines the phasing provisions within the policy, should be deleted.

Participate at Examination: Yes

We consider it necessary that we participate in the oral part of the examination to demonstrate that the phasing set out in the policy is not justified or effective, which impacts upon the soundness of the DPD.
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<tr>
<td>26231</td>
<td>Mr D Bainbridge Bidwells</td>
<td>Water Cycle Study</td>
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**Comment ID:** SASub257  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:** Justified

I write on behalf of Bidwells' Client, Larkfleet Limited, in response to the above. Firstly, I would like to thank you for providing interested parties with the opportunity to comment on the South Kesteven District Council Detailed Water Cycle Study (WCS), Final Report, dated November 2011 and the proposed schedule of changes. I would like to confirm that the representations submitted on behalf of my Client dated 18 November 2011 in respect of the Site Allocation and Policies Development Plan Document (SAP DPD) Submission version, remain relevant and should be provided by South Kesteven District Council (the Council) as part of the submission to The Planning Inspectorate (PINS) when the SAP DPD is submitted for examination. I also request that this further response is also considered by the Council and provided to PINS.

My Client is a local stakeholder who undertakes award winning sustainable residential and commercial development in the East of England and whose head office is located at Bourne in South Kesteven District (the District). My Client has a number of land interests at various stages of the planning process located within the District.

You will be aware from the aforementioned representations and other discussions held with planning officers at the Council that my Client is promoting land to the north of Market Deeping for housing-led mixed-use development. This site has been identified in the SAP DPD under Policy DE1d, Policy DE2 and Policy DE3. You will recall from the aforementioned representations that my client is supportive of the Council's intention to progress the SAP DPD through to examination and is supportive of the Council's intention to allocate the aforementioned site under these policies.

Notwithstanding this my Client has expressed concerns about certain aspects of the soundness of the SAP DPD such as the lack of justification for the phasing of development at The Deepings as proposed by Policy DE1. In our response in respect of Policy DE1 we requested that the WCS and any additional relevant information from Anglian Water Services Limited (AWS) be made available as part of the evidence base and considered prior to submission of the SAP DPD.

We are pleased the Council has undertaken this further consultation but following careful consideration of the newly available evidence and the proposed changes it is with some regret that we must confirm our continued objection to the phasing contained within Policy DE1. To inform this response my Client's consultant engineers M-EC, have engaged with AWS. The main reason for this is because we understand the Council's intention for phasing of development at The Deepings as covered by Policy DE1 is entirely due to the content of the WCS. In particular, the phasing is being proposed by the Council entirely because of the perceived lack of capacity at The Deeping Waste Water Treatment Works (WwTW) for additional flows as a result of uncommitted development. This is a detailed...
technical matter one which M-EC as consultant engineers are experienced in dealing with.
Just to confirm there is no planning policy basis to the proposed phasing under Policy DE1. The Core Strategy adopted July 2010 does not contain a strategic policy requiring the phasing of residential and other development at The Deepings or at any of the market towns in the District. Neither Policy SP1: Spatial Strategy or the explanatory text to this policy requires the phasing of development across the plan period i.e. to 2026, at The Deepings or at any of the market towns in the District. Policy H1 Residential Development and part of the explanatory text states that new housing in the District to 2026 should be planned and phased to deliver the minimum level of housing development required by the Regional Plan. Through the careful selection of sites for development at The Deepings, which are intended to deliver the minimum level of housing required by the Regional Plan, there is absolutely no justification for phasing of the development into 5 year delivery periods. Therefore, as mentioned above the phasing proposed by Policy DE1 is entirely because of the perceived lack of capacity at the WwTW for additional flows as a result of uncommitted development.
Comments on WCS and WwTW
We consider there is no justification for the phasing of development at The Deepings under policy DE1 based solely on the findings of the WCS.
Foul capacity for new development cannot be reserved for future take-up because it is allocated by AWS on a first come first served basis.
We understand directly from AWS that the response in the WCS to the capacity situation at the WwTW takes into account the cumulative effect if all potentially allocated sites were connected to the works at the same time and highlights the need for a revised environmental consent should this situation occur. In reality, not all sites will be developed at the same time and therefore it is AWS’s duty to manage the load as and when it comes on-line and to take the appropriate action as necessary.
AWS is able to design, cost and implement improvement works in-between the Asset Management Planning cycle (of which we are currently within the fifth cycle which began in 2010). Under the Water Industry Act (1991) a connection on capacity grounds can not be refused by the relevant water authority if a suitable connection point to the server network can be provided. M-EC have confirmation from AWS that the sewerage system at present has capacity for gravity flows from the proposed development site (under Policy DE3). The connection point will be to the 175mm foul sewer in Towngate East, Market Deeping. It has been determined that a pumping station will be required on site and AWS has confirmed that pumped flows of 7 litres per second can be supported within the foul sewer in Towngate East without the need for upgrades.
It is our view that whilst the WCS is a useful part of the evidence base to inform the SAP DPD, the findings in respect of the WwTW should not be translated by the Council into a restriction on the timing of delivery of new development at The Deepings. Even if this were a justified response to the WCS, the Council’s intention to allow an indicative number of 100 houses under Policies DE1a and DE1b in advance of the tail-end of AMP5, is not justified by the WCS. Either there is no capacity and no new development can be delivered and hence all sites should be held back (which is not supported by the evidence) or else none of the sites should be held back (which is the correct approach to take).
According to the WCS the solution to the WwTW capacity might take several years to decide on and implement. The WCS states that the works will be decided before AMP6 commences in 2016. We infer from correspondence by AWS that should development be granted planning permission prior to delivery of a capacity solution in AMP6 then it will be AWS’s responsibility to fund and provide sufficient foul capacity to the relevant site, in both the treatment works and wider infrastructure.
As mentioned above, on other sites we have been involved in, AWS have been able to identify what improvements are required in less than a year and have indicated a programme of 2 years in order to deliver the full scheme. This is outside of the AMP period and previously was not included as part of any known budget by AWS for the particular location. Whilst the relevant waste treatment works are considered to be at capacity, the developer is being permitted
connections up to a specific threshold to enable an initial phase of development to proceed.
Whilst the SAP DPD seeks to allow 100 dwellings at The Deepings prior to 2016 under Policies DE1a and DE1b, there is no explanation or justification for this decision. If this is a sound approach to take then this could be equally applied to an initial phase of my Client's site under Policy DE1d (DE3).

The lack of clarity and justification for the phasing approach under Policy DE1 is compounded by the fact that the catchment area for The Deepings WwTW extends beyond current built development and any extension to The Deepings. There is at least one emerging residential development site within the catchment area which is at the pre-application stage and about which AWS have been engaged pre-application and have confirmed in a pre-development report that capacity exists for foul drainage to the WwTW.

Comments on Proposed Changes to SAP DPD

The proposed change under paragraph 3.3.15 of the SAP DPD now states:
"Until a new permit is obtained and the technical requirements of the works have been implemented no additional development should taken [typo: replace with 'take'] place. This represents a constraint to the overall capacity of the works which limit new development in the town for the first five years of the plan period."

Whilst we do not accept this as a consequence of the WCS, should the Council succeed in pursuit of this aim then it absolutely follows that all proposed site allocations within the SAP DPD should be phased for commencement after 2016. However, the proposed changes do not deliver on the above statement as no change is proposed to Policies DE1a or DE1b.

Support is expressed for the proposed additional statement at the end of paragraph 3.5.1 of the SAP DPD because this would appear to represent a pragmatic approach to delivery of development, should the Council succeed in phasing development.

Support is expressed for the proposed new paragraph 3.5.1a of the SAP DPD because this would also appear to represent a pragmatic approach to delivery of development, should the Council succeed in phasing development. Notwithstanding this, if the phasing and new paragraph is considered acceptable at examination, these might be viewed at odds with the first sentence of paragraph 3.5.2 and therefore it is recommended this is considered by the Council prior to submission of the SAP DPD

Conclusion

In conclusion, foul drainage within the catchment area of The Deepings WwTW will be self-managed by AWS and the EA. These statutory bodies will not permit new connections to the system if capacity constraints or environmental impact will occur. Therefore, the SAP DPD does not need to impose additional restrictions on phasing of development at The Deepings. By allowing AWS and EA to manage the situation will ensure greater flexibility in the delivery of development at The Deepings should for example improvements come forward prior to the time periods in the current draft of the SAP DPD.

These representations raise objections to the soundness of the approach proposed by the Council to phase development at The Deepings based on the WCS. This is a fundamental issue for The Deepings and for the SAP DPD and therefore it is requested that the Council's lead officers and key contacts at AWS and the EA are invited to attend a meeting with my Client and consultants in advance of submission of the SAP DPD. Such an approach is likely to be seen as being helpful by the Planning Inspector appointed to examine the soundness of the SAP DPD and it might result in changes which enhance the prospects for a sound DPD.

Changes to make DPD sound:

Participate at Examination:
Consultee: 260968  Mr Tim Lee  
Stamford Chamber of Trade and Commerce

Comment ID: SASub247  
Type: E-Mail  
Attached Files: 

IS DPD Legally Compliant:  
Legal Compliance Reasons:

Is DPD Sound:  No  
Unsound because DPD NOT:  

We confirm our wish to attend/be represented at the Examination Hearing(s) into the soundness of the Stamford part of the SAP DPD. Our representations and objections of 18 November 2011 have already set out our views in respect of the Flood Risk issues on our Chamber's proposed Stamford "East" site, including a report by our consultants WYG which makes clear that there is no flood risk of any significance to the development of the "East" site. WYG are more familiar with the detail of our site than either Entec or AMEC; for instance WYG have detailed topographical survey levels. We consider WYG judgements which are supported by the EA are more likely to be correct than the original SKDC Flood Risk judgements of Entec and now EMEC which necessarily take a more broad brush approach.

AMEC also assert that sewerage is a strategic problem in Stamford and will affect all sites equally. This is not correct. This problem, whilst severely affecting sites to the West of Stamford, does not affect our Chamber’s "East” proposals. This is because the developments can pump their foul sewage directly into the Stamford terminal pumping station (TPS) near Hudds Mill, which forwards flows to the Stamford WwTW near Barnack. This system is operating at only 65% capacity. In respect of STAM01 and STAM02 on the West, AMEC states it will take up to 5 years to design solutions and obtain funding, plus construction time. It is therefore questionable if the STAM01 and STAM02 sites are deliverable.

The new evidence calls into question the fundamental basis upon which the STAM01 and STAM02 sites were selected as the SKDCs choice as the Urban Extension for Stamford.  
[full text attached]

Changes to make DPD sound:  
To avoid delay and legal challenge, SKDC should now revise their entire Site allocation and Policy Development Plan Document for Stamford.

Participate at Examination:  Yes
The 2nd paragraph of the policy states “The development of this site should provide approximately 400 new homes completed in phases across the 10 year period 2016 to 2026 and up to 14 ha of land for a range of different employment uses including a 10 ha high quality and designed business park (as allocated in STM2 above)”. Reasons why it is not justified:

- It is not considered that the phasing of the development within the policy is justified as it is unnecessarily restrictive in terms of the delivery of the development and not informed by a robust and credible evidence base.
- The Planning Inspectorate’s Soundness Guidance (August 2009) requires consideration of the following:-
  - “Is the content of the DPD justified by the evidence? What is the source of the evidence? How up to date is it and how convincing is it?”
- Paragraph 3.1.2.2 states that the phasing of sites has been influenced by evidence relating to infrastructure constraints, particularly wastewater infrastructure. However, the findings of the Water Cycle Study that forms part of the evidence base do not appear to be consistent with a pre-development report prepared by Anglian Water on behalf of the promoters of the site. This report demonstrates that capacity exists within the sewerage infrastructure to accommodate the STM3 development, with a choice of three potential points of foul water connection to adequately convey flows from the development to the treatment works. Indeed, the site specific advice from Anglian Water does not suggest “significant infrastructure improvements” being required as suggested by the Water Cycle Study.
- Adequate headroom is available at Stamford Sewage Treatment works for the development.
- Further, no justification for the 2016-2026 timeframe has been provided within Policy STM3 or its supporting text, and it has not been demonstrated that the definition of this phase (or the allocation of the site within it) is founded upon a robust and credible evidence base.

Reasons why it is not effective

- The policy is not “effective” as it does not allow a sufficient degree of flexibility. The lack of flexibility within the proposed phasing undermines the soundness of the DPD. The Planning Inspectorate’s Soundness Guidance (August 2009) sets a key question in relation to flexibility: “Is the DPD flexible enough to respond to a variety of, or unexpected changes in, circumstances?” The answer to this is ‘no’ as there is no mechanism within the policy to bring forward the development of the site in the event that circumstances, such as housing land supply, require it.
- Reasons why it is not consistent with National Policy
Paragraph 10 of PPS3 sets out a number of outcomes the planning system should seek to deliver. One of these is: “A flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate”.

Furthermore, paragraph 52 goes on to say: “The Government’s objective is to ensure that the planning system delivers a flexible, responsive supply of land. Reflecting the principles of ‘Plan, Monitor, Manage’, Local Planning Authorities and Regional Planning Bodies should develop policies and implementation strategies to ensure that sufficient, suitable land is available to achieve their housing and previously-developed land delivery objectives”.

This is further reinforced by paragraph 14 of the draft National Planning Policy Framework (NPPF) which requires local authorities: “to prepare Local Plans on the basis that objectively assessed development needs should be met, and with sufficient flexibility to respond to rapid shifts in demand or other economic changes”.

The phasing provisions of the policy could work against these principles, particularly as there is no mechanism within the policy to bring forward development where a shortfall in land supply requires this.

**Changes to make DPD sound:**
Given the site is available, deliverable and free of any significant constraints, it is considered that the reference to the phasing should be omitted from the policy.

The following paragraph is suggested as a replacement to the 2nd paragraph of the policy:

“The development of this site should provide approximately 400 new homes and up to 14 ha of land for a range of different employment uses including a 10 ha high quality and designed business park (as allocated in STM2 above)”.

**Participate at Examination:** Yes
We consider it necessary that we participate in the oral part of the examination to present evidence relating to the infrastructure capacity and to demonstrate that the phasing set out in the policy is not justified or effective, which impacts upon the soundness of the DPD.
IS DPD Legally Compliant: Yes
Legal Compliance Reasons:
Is DPD Sound: Yes
Unsound because DPD NOT:

Changes to make DPD sound:
The findings of Water Cycle Study (WCS) are broadly supported. With reference to site LSC1f it is noted that the WCS concludes that:
- The site is at no risk of fluvial flooding and only low risk of pluvial flooding
- The Long Bennington Waste water Treatment Works (WwTW) catchment area has Dry Weather Flow spare headroom capacity even if all four potential development sites (approximately 219 dwellings) in the settlement were constructed.
- Long Bennington does not fall within a Source Protection Zone
- Long Bennington WwTW do not require upgrading to accommodate the growth recommended for the settlement in the draft Site Allocations document

The WCS does however, conclude that the whole of Long Bennington is vulnerable to sewer flooding and a strategic solution, involving further investment in the sewerage network is required prior to any further development in the settlement. The WCS indicates that there could be a potential delay of at least five years for this solution to be resolved.

In response to the conclusions of the WCS further clarification has been sought from Anglian Water regarding the current situation with sewer capacity in Long Bennington. This was considered to be necessary as Part One of the WCS had concluded that this issue was not of concern for the settlement.

On the recommendation of Anglian Water a Pre-Development Enquiry Form was completed in order to confirm what site specific issues related to the development of LSC1f for upto 35 dwellings. The findings of that enquiry can be summarised as follows:
- Public foul and surface water sewers are within close proximity of the development site boundary, Long Bennington Sewage Treatment Works has available capacity for foul drainage from the proposed development
- The sewerage system has available capacity for gravity flows from the proposed development site.
- There have not been any instances of flooding in the vicinity of the development site that can be attributed to the public sewerage system.

Since the publication of the report Anglian Water has confirmed that the site discharges to a sewer network which is separate from the main Long Bennington sewer catchment. I have been informed by Anglian Water that this network serves a relatively small proportion (approximately 15%) of the settlement towards the northern eastern edge. On the basis of this report it is our understanding that LSC1f is capable of being delivered within the first five years of the plan without
requiring the improvements to the sewer network.
I have attached a copy of the report for your information.

**Participate at Examination:**
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee                  
407064    Mr Philip Williams
Ryhall Road Residents Association

Consultation Point         
Water Cycle Study

Comment ID: SASub245
Type: E-Mail

IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT:
I strongly agree with the thrust of the reports recommendations that "any growth in Stamford will need to be limited until a sewerage solution is in place" also "serious constraints have been identified in Stamford and partial development would be more likely to generate cumulative problems and difficulties." I believe STAM05 (STM1d) in particular should not be taken forward on the grounds of constraints in the water environment and water infrastructure. With projected costs of WwTw in excess of 1 million pounds, plus the further costs of road improvements that this site would require. I don’t think the taxpayer either directly or indirectly should fund this project unless this development can be shown to be a moral imperative and be of national importance.
These comments are made in the light of information provided in "The Final Water Cycle Study Report".

Changes to make DPD sound:
Participate at Examination:
**Site Allocation DPD: Submission October 2011 - Consultee Comments**

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<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tr>
<td>407029 Mr Robert Conboy</td>
<td>South West Approaches Group</td>
<td>Water Cycle Study</td>
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**Comment ID:** SASub244  
**Type:** E-Mail  
**Attached Files:**

**IS DPD Legally Compliant:**
**Legal Compliance Reasons:**

**Is DPD Sound:** No  
**Unsound because DPD NOT:**

I write as Chairman of the Stamford South West Approaches Protection Group to reaffirm our objections to the allocation of development on 71.5 acres of land nominated STAM01 and STAM02 and also confirm that our group wishes to be represented/attend at the Examination Hearings into the Soundness of the Stamford part of the Local Development Framework site allocation.

The allocation decision was made on the insufficient and flawed information particularly with regard to the status of alternative brown field sites to the east of Stamford, which was incorrectly excluded on a flood risk basis which has now been shown to be a false assumption.

No account was given for the allocation of sites STAM01 and STAM02 of the requirements for capacity in existing systems to cope with additional foul and surface water volumes.

All these issues, together with several others suggest that SKDC should withdraw the allocation on STAM01 and STAM02 and correctly assess allocation of other brown field sites to the east of Stamford.

**Changes to make DPD sound:**

**Participate at Examination:** Yes
Site Allocation DPD: Submission October 2011 - Consultee Comments

Consultee:
294235  Mr Mark Mann
Savills

Agent

Consultation Point

Water Cycle Study

Comment ID: SASub255
Type: E-Mail
Attached Files:

IS DPD Legally Compliant:
Legal Compliance Reasons:

Is DPD Sound: No

Unsound because DPD NOT:
Savills L&P Limited has been instructed by PricewaterhouseCoopers LLP (PwC) the administrative receivers of FH Gilman and Co. to make representations in respect of land at Stamford.

Further to the representations made in respect of the Site Allocations and Policies Document (SA&PD) in November, please find below our representations in respect of the Detailed Water Cycle Study undertaken by AMEC on behalf of the Council. The Water Cycle Study forms part of the ‘evidence base’ of the SA&PD and is required to determine whether or not the planned for growth for the town can be accommodated within the existing or planned for water infrastructure. Some potential sites will perform better than others in this respect; therefore this document is important in identifying sites for development.

The comments below should be considered along with the comments already made in respect of the SA&PD made in November 2011. As discussed with Mrs Parr, we confirm that F H Gilman & Co wishes to attend/be represented at the Examination Hearing(s) into the Soundness of the Stamford part of the SA&P Submission DPD.

In our earlier representations in November 2011 we highlighted concerns about the assessment of potential development sites as detailed in the report by the Portfolio Holder for Economic Development reported entitled Site Allocation and Policies DPD: Site Assessment and Allocation.

For the purposes of that assessment the Council had grouped together the lands owned by F H Gilman & Co in the Gwash Valley at Stamford (STAM14) with a number of adjacent sites (STAM15 and STAM16) to create a very large site in excess of 91ha. This was compared with sites of less than 30ha each. As a result we considered the comparison of the three sites was considered to be unfair. In addition we also raised concerns about the nature of the evidence and its interpretation, used to support the Council’s preferred option.

Consequently, you were advised that the SA&P DPD was unsound as the Council had not justified its choice adequately.

The Detailed Water Cycle Study compounds this unfairness and also makes it even more difficult to compare the relative merits of each potential site again by amalgamating the land owned by F H Gilman & Co with other adjacent sites and also by combining some sites with others and changing their names. For example, STAM14 and STAM17 have been added together to form a new site known as STAM18 for reasons that remain wholly unclear. Whilst other sites including the preferred options STAM1 and STAM2 remain the same the sites to the east of the town have been altered which makes comparing sites difficult.

We also note that STAM17 does not appear to have been considered in the report by the Portfolio holder of Economic Development in August 2011 as part of the proposed Newstead site. That report refers only to Sites STAM14-STAM16 forming part of the Newstead site. However, it must include that site as in order to get
to a figure of over 90ha all four sites (STAM14-STAM17) need to be added together.
In respect of STAM18, which includes STAM14, the Water Cycle Study states:
Flood risk is a severe constraint to small sections of some of the sites which extend into Flood Zone 3b (STAM15, STAM18, and STAM16 of which approximately 4 percent of the land lies in flood zone 3b). No development (unless it is water compatible) should be located within flood zone 3b. Most of STAM18 (which incorporates STAM15) is actually in Flood Zone 1 (very low risk of flooding) but there are patches at high risk in the south west corner of the site, and along the northern perimeter. The Sequential Test has been applied within the SFRA and the sites have been identified on this basis. However, where there remain minor areas of overlap it is recommended that the site boundaries are refined so that these erroneous areas of overlap are excluded.
It is clear that in terms of flood risk STAM18, which now includes STAM14 (not STAM15 as the report actually says), should not be dismissed as a potential site for development on the grounds of flood risk. Indeed, in the Level 1 Strategic Flood Risk Assessment (SFRA) report (ENTEC, June 2009) it is stated:
It should be noted that where the floodplain is narrow, but a proposed development site overlaps with Flood Zones 2 or 3, this can appear to suggest a disproportionately large area at risk of flooding. The maps are still relevant to this case to highlight the need for further consideration of flood risk, however for larger sites a sequential approach can then be applied in within a site, as described below.
“\nThe sequential test can first be applied to whole sites, to provide the most effective and efficient avoidance of development in areas of flood risk. However for larger sites allocated for development or regeneration, this could be highly restrictive. This is particularly evident in South Kesteven where the flood plains are generally narrow but some potential site allocations are located close to the river. ...These [maps] can be used to apply the sequential approach within a site, by steering all, or at least the most vulnerable, development away from the areas of flood risk.\nThe above approach is not contradicted by the Level 2 SFRA (ENTEC, Jan 2011) which states:
“The Level 2 SFRA does not supersede the Level 1 SFRA, rather it provides new and more detailed information in specific parts of the District, where development pressure and flood risks coincide....
The reader is directed to the Level 1 SFRA for full details on the flood risk assessment methodologies applied in the District and for a discussion of relevant planning policy guidance”.

thus confirming that, in the specific case of the STAM 18 site (including STAM14), the presence of a small area of Flood Zone 3b should not prejudice the allocation of the remainder of the site.
This is further supported by the additional, detailed work that has been undertaken in respect of the proposed Gwash Valley Business Park, by WYG Limited. Their detailed hydraulic modelling report concludes that:
WYG undertook a hydraulic model which analysed the construction of the river diversion through the construction of a fish pass as well as a wetland. This showed that this was feasible to achieve without affecting the flow upstream and downstream of the site, whilst reducing the extent of Flood Zone 2, 3a and 3b to such an extent that the proposed outline application was no longer affected with the exception of Cell 5 which would be abandoned in part to make room for the construction of a wetland which would enhance the ecology within the area and also act as part of the SuDS for the site.
The construction of the fish pass would effectively put the entire site within Flood Zone 1 meaning that the site could be considered as suitable as any other within Stamford for development.
The hydraulic modelling undertaken indicates that the development is feasible and that the detail of the scheme is proposed to be undertaken under separate detailed applications.
The revised modelling has been reviewed by the Environment Agency and the technical aspects of the modelling have been agreed with them. They also suggest
that in the light of this modelling the flood zones need to be revised. In respect of potential pluvial flood risk, again the above report confirms that a Sustainable Drainage Systems (SuDS) is appropriate for the site and that a suitable scheme can be achieved that will ensure that run off will not exceed current levels.

Sewerage Capacity
In terms of sewage capacity, the study confirms that there is sufficient capacity at Stamford WTWs for the level of proposed development. However the study considers that a significant constraint to development in Stamford is that all of Stamford’s sewerage system flows to the Hudds Mill Terminal Pumping Station (TPS)
This is located close to STAM09 one of the FH Gilman sites and this TPS includes a combined sewer overflow (CSO). Anglian Water is rightly concerned that any growth in Stamford will add to the existing pressure on this CSO increasing the risk of non-compliance (i.e. spills into the watercourse). Anglian Water has examined the potential growth at the preferred sites using a hydraulic model. At this stage it has concluded that the capacity in the existing sewer system may not be sufficient to avoid increased spills at the CSO and has concluded that a more detailed Urban Pollution Management (UPM) study will be required to better understand the precise issues for each site, and as an accumulation.

The study states:
This is a major risk for the Council as stated in the study. Anglian Water has stated that it would be preferable to undertake a single UPM study to take account of and integrate all the sewerage issues that the proposed Stamford growth would generate.
At this stage Anglian Water anticipates the results of a UPM will indicate that significant sewerage upgrades will be required to support growth in Stamford.
The study then comments that:
Sewerage is a strategic problem in Stamford and will affect all sites equally as whichever sites are selected sewerage flows will put unacceptable pressure on the downstream CSO.
We suggest that this is not true as the issue of spillage from the CSO at the TPS only occurs during a storm because the sewers in Stamford are largely combined sewers. A dedicated foul sewer from STAM18 would not require major works to the sewerage infrastructure; we suggest only a short run of sewer from that site to the TPS a few hundred metres away. Surface water would be dealt with by SuDS and would go into the River Gwash, thus avoiding any increase in pressure on the CSO.
Table 3.5 of the study appears to confuse matters further and states in respect to STAM18:
The site appears to fall considerably from west to east; consequently a pumping station would be required to pump the flows directly to ST Martins Without SPS. However, depending on the available capacity / storage at the TPS, it may be necessary to pump the anticipated flows from the site directly to the WwTW
STAM18 includes the River Gwash which flows north to south, towards the TPS, until it reaches the southern edge of what was STAM14 (now part of STAM18), where it then turns and flows east. At that point it is less than 0.5km from the TPS and whilst there is some higher ground in between (owned by FH Gilman), it is likely that a foul water connection could be made to the TPS without the need for a pumping station. Apart from crossing Uffington Road, all new sewer pipes can be laid in land owned by FH Gilman. In addition, as outlined above, we consider that there is capacity at the TPS itself, provided it relates to foul water only.
The reference to ST Martins appears to be erratic as it makes no sense to pump flows to the other side of the River Welland.
In respect of STAM01 and STAM02, whilst those sites also could potentially use SuDS for surface water, foul water flows would have to utilise the existing (and almost certainly requiring upgrading) combined sewers to get to the TPS and therefore they would have an impact on the CSO which the study confirms is unacceptable.
In Table 8.1 in Section 8 of the Water Cycle Study report, in relation to constraints, it is stated that: “All sites: restricted by 6 to 18 months to allow for Urban Pollution Management modelling to be completed. This may coincide with the planning application timetable. This does create a risk as the impact in terms of timescale will not be certain until the UPM study is complete. The results may identify category 1 (severe) constraints. Part One of this study indicates that this risk is high. Lead in time for design and implementation of required infrastructure upgrades could be a further 5 years”.

However, in much the same way as the study confirms that FH Gilman site STAM09 is ‘technically’ unconstrained, we consider that STAM18 (incorporating STAM14) is also unconstrained. While it may still be considered necessary to carry out the initial UPM study, the subsequent 5 year delay to development while the sewerage infrastructure of Stamford is upgraded, can be completely avoided if the development were to be located within STAM18. Thus, we conclude that the development of STAM18 as a whole or in part will have limited impact on the sewerage system in Stamford and in respect of STAM14, is acceptable in terms of flood risk. As these were factors which were used by the Council is identifying the preferred sites, the Council should reassess the appropriateness of their decision in the light of this information.

Our representations contained within my letter of the 18 November also raised questions about the soundness of the evidence used by the Council, as well as the manner in which that evidence was used, when the Council identified their preferred sites for development. On balance we consider that the FH Gilman sites perform well when compared to the other sites including the Council’s preferred location STAM01 and STAM02. In addition part of STAM14 is previously developed and the Council should give every encouragement to developing such sites, rather than discouraging it. Should the Council’s preference prevail, then STAM14, currently allocated under E2.3, will become unallocated and any chance of redeveloping this site and delivering the necessary environmental improvements will be significantly reduced.

We would be grateful if you would consider these further representations and pass them onto the Inspector at the appropriate time. Should you have any queries regarding any of the above please contact me.

**Changes to make DPD sound:**

**Participate at Examination:** Yes
### Site Allocation DPD: Submission October 2011 - Consultee Comments

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<th>Agent</th>
<th>Consultation Point</th>
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<tr>
<td>26481</td>
<td>Ms Jennifer Dean</td>
<td>Water Cycle Study</td>
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<tr>
<td>Anglian Water</td>
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</table>

**Comment ID:** SASub261

**Type:** E-Mail

**Attached Files:**

**IS DPD Legally Compliant:**
Legal Compliance Reasons:

**Is DPD Sound:**
Unsound because DPD NOT:

**Changes to make DPD sound:**

We are encouraged with the level of engagement on water infrastructure and the site allocations DPD. I have the following comments to ensure the document is clear and reflects the findings of the WCS. In view of the relationship between predevelopment queries and the WCS, we are keen that the WCS is seen as a starting point for engagement highlighting areas for further consideration. This should lead to developers engaging with AWS/EA/SKDC to progress the issue. In partnership we may identify solutions that will allow sites to come ahead of the phasing plan. However, we support the position that until capacity is created, or a solution to create capacity is identified, development is likely to be delayed.

**3.1.14**

The WCS (page 63 table 9.2 of Oct 2011 draft) suggests a UPM (and has not revealed a constraint but a potential issue). We suggest the wording is amended to reflect this. For information, we do not normally undertake UPM models for this scale of development (less than 10% increase in population), however we have taken on board this comment and are progressing a UPM study (this will take about 3 months).

**3.1.2.2** rather than referring to additional modelling it may be prudent to refer to ‘additional consultation with relevant parties’ (EA, AWS and SKDC). There are many considerations and modelling may not be required (it is one part of assessment).

**3.3.15** the trigger should be creating sufficient capacity rather than a new permit. I suggest the following sentence replaces the- until a new permit... ‘Until sufficient capacity is created, or a solution identified, no additional development...’ Capacity could be created through a new permit, network optimisation or a reduction in existing demand.

**3.4.1.4** From my understanding the site in question in Long Bennington (previous reference LB02a) does not impact on the sewerage issues as it bypasses the area of concern. This may need to be reflected within this section.

**3.5.1a** We suggest as the modelling is not complete for the UPM in Stamford we do not know whether a strategic solution is required. The first paragraph could be misleading.

**5.2.8** suggest the wording is changed along the following lines:

Deeping- Additional capacity at Deepings WwTW is required, this can be achieved through measures such as a new discharge permit, network optimisation and/or reduction in existing demand.
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Stamford- According to table 9.2 page 64 of draft WCS Oct 2011 there appears to be sufficient capacity for the proposed growth.
Harlaxton- Additional capacity at Harlaxton WwTW is required, this can be achieved through measures such as a new discharge permit, network optimisation and/or reduction in existing demand.
Marston- We have a strategy in place to meet the demands at Marston. Please see the Grantham Wastewater Growth Strategy Report provided to SKDC to inform the Grantham Area Action Plan.

We are keen to ensure water infrastructure is adequately considered upfront without blocking development. We are committed to work with all parties to progress solutions to enable development of the proposed sites.

5.2.9 suggest the inclusion of ‘may’ delay. The developer will need to engage with us in order to progress the solution. Without the upfront engagement the delays are more likely to impact on the development.

The tables on page 67:
Stamford Sewerage: Risk and contingency- we can confirm a UPM is underway. Request ‘additional’ is removed as it will identify the only constraints (if there are any).

Stamford STW- this is not a problem so we suggest this line is removed
Deepings STW- remove developer requisition from funding sources. Reflect the comments above (Additional capacity at Deepings WwTW is required, this can be achieved through measures such as a new discharge permit, network optimisation and/or reduction in existing demand) in detail rather than upgrades at works.
Harlaxton STW- remove developer requisition from funding sources. Reflect the comments above (Additional capacity at Harlaxton WwTW is required, this can be achieved through measures such as a new discharge permit, network optimisation and/or reduction in existing demand) in detail rather than upgrades at works.

Remove Long Bennington as the site proposed is not impacted?
Bourne sewerage- no changes proposed.

Participate at Examination:
Consultee: 487941  Mr M Newton  
Boyer Planning 

Consultation Point: Water Cycle Study 

Comment ID: SASub253  
Type: E-Mail  
Attached Files: Boyer Planning WCS.pdf 

IS DPD Legally Compliant: Yes 
Legal Compliance Reasons: 
Is DPD Sound: No 
Unsound because DPD NOT: Justified 

This policy principle refers to “Provision of necessary infrastructure improvements required to support the development, including improvements to the waste water transmission network.” 
The principle does not satisfy one of the key questions raised in the Inspectorate’s soundness guidance in relation to the test of justification: i.e. “Is the content of the DPD justified by the evidence? What is the source of the evidence? How up to date is it and how convincing is it?”  
Anglian Water has provided information and evidence to the effect that “improvements to the waste water transmission network” are not necessary to support the development of the STM 3 allocation. This evidence is provided in the form of appraisals completed by Anglian Water specifically for the proposed development of the site (see Appendix to this representation). 

Following the completion of modelling for the Empingham Road site, Anglian Water states:  
“The sewerage system, at present, has available capacity for gravity flows from the proposed development site.” 
In its appraisal, Anglian Water has also indicated three suitable points of connection that can accommodate the full extent of the development and ensure an appropriate on-site drainage strategy can be formulated for the disposal of foul flows. 
The information provided, which can be found within the Appendix to our representation on Policy STM 1, provides details of the investigation that has been completed in relation to foul drainage capacity for the Empingham Road site. The results demonstrate that sufficient capacity is present within the network and that no reinforcements will be required to accommodate the development. Another statement by Anglian Water, also contained within the Appendix to our representation on Policy STM 1, demonstrates this further:  
“The current situation is that there is sufficient capacity within the existing network to receive foul flows from the proposed development on land West of Stamford as and when required, as such, we do not currently anticipate the need for a phased approach to development nor do we envisage upgrades to the system as a result of this development going ahead.”  

Therefore, Anglian Water indicates there is available capacity to accommodate development within the existing network without the requirement for upgrading. 
From the information provided by Anglian Water, we conclude that the STM 3 allocation may proceed without improvements to the waste water transmission network. 

In order to be considered sound, the DPD must be founded upon a robust and credible evidence base which includes the requirement that the choices made in
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the plan are backed up by facts. In this case, the requirement to make improvements to the wastewater network does not fulfil this requirement and is not considered justified.

Changes to make DPD sound:
Deletion of bullet point 9.

Participate at Examination: Yes
We consider it necessary that we participate in the oral part of the examination to present evidence relating to the infrastructure capacity and to demonstrate that the development can be accommodated within the existing network, which impacts upon the justification and soundness of this part of the DPD.