Summary of Comments
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 â€“ A Guide to Good Practice'.

Officer's Response
None of the proposed allocations are designated Wildlife Sites and the
information available confirms that there is little or no wildlife interest.
There may be opportunities for improving wildlife sites as part of
development.

Summary of Comments
Houses not needed. Sites mainly greenfield (against national policy). Wants local
SHMA.

Officer's Response
The allocations accord with the Core Strategy requirement to provide
additional residential development to 2026. The site assessment process
provides robust evidence for site selection. Greenfield sites have been
selected because not sufficient brownfield land is available, or suitable,
for development.
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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26691</td>
<td>Peter Williams</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
</tr>
<tr>
<td>607538</td>
<td>Cllr Bob Sampson</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
</tr>
</tbody>
</table>

**Summary of Comments**

**Consultee**: 26691 Peter Williams  
**Agent**: East Midlands Councils

**Comment ID**: SASub2  
**Type**: Letter

Do you consider the DPD Legally Compliant? = Yes  
Do you consider the DPD is Sound? = Yes  
On the basis that the Site Allocation and Policies DPD will reflect the RSS and your core strategy, it is not appropriate from the viewpoint of strategic planning policies to comment on the local planning policy framework or detailed merits of individual sites.

**Officer’s Response**

no action required

**Summary of Comments**

**Consultee**: 607538 Cllr Bob Sampson  
**Agent**: East Midlands Councils

**Comment ID**: SASub211  
**Type**: Letter

Concerns that rural villages and hamlets are being 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. Concerns about LA policy re housing tenants. Wants term "less sustainable" removed from SKDC vocabulary.

**Officer’s Response**

This representation raises matters which were addressed in the preparation and examination of the Core Strategy, and it is not appropriate to re-visit them through the SAP. The concerns about tenants of Local Authority housing should be raised with the Tenancy Services Team.

09/03/2012
**Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response**

### Consultee
26481  Ms Jennifer Dean  
Anglian Water

**Comment ID:** SASub202  
**Type:** E-Mail

**Summary of Comments**
DPD not reflect the evidence in WSC - especially related to phasing of DE1a, DE1b and LSC1f. 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. Want text amended to reflect the above.

### Agent

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

### Officer's Response
Changes have been proposed to the DPD to reflect the recommendations of the final detailed WCS published in November 2011. (See Schedule of Proposed Minor Changes: WCS1-WCS16). This is a constantly changing matter and may need to be updated, however, as more information is available.

### Consultee
26233  Mr Peter Graham  
Exclusive Brethren

**Comment ID:** SASub156  
**Type:** E-Mail

**Summary of Comments**
Wants plan to make provision for: the erection of places of public worship and the provision of faith related schools

### Agent

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

### Officer's Response
It is not considered appropriate to allocate land specifically for places of worship or for faith-related schools. Applications for such facilities will be considered on their own merits. The Council is, generally, supportive of proposals for local facilities and services.
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<tr>
<td>260141 Ms Rose Freeman</td>
<td>Theatres Trust</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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</tbody>
</table>

**Summary of Comments**
Lack of guidance for Use Classes. Use Classes not included in Glossary. Policies for community facilities/assets but is unclear about what term represents - no description in Glossary and only few examples in supporting text.

**Officer's Response**
Minor change is proposed to include Use Classes in Glossary and link to where fuller information is available on the Planning Portal.

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<tr>
<td>474396 Mr Gordon Smith</td>
<td></td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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</table>

**Summary of Comments**
DPD too narrow focus. Should include leisure, open space and other services necessary to a sustainable community.

**Officer's Response**
Comments noted. DPD policies are in accordance with the Core Strategy. Issues relating to open space and infrastructure provision are included in this plan. No specific proposals but potentially also fall under SP1.
Summary of Comments
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.

Officer's Response
comments noted.
### Consultee
| 489312  | Mr Stewart Patience | 
| Cambridgeshire County Council |

**Comment ID:** SASub39  
**Type:** E-Mail

### Summary of Comments
Thank you for the opportunity to comment on the above Development Plan Documents. As the proposals do not raise any significant issues for Cambridgeshire County Council has no comments to make in relation to these documents. However the County Council would wish to be consulted on any relevant planning policy documents in the future.

### Officer's Response
noted

### Consultee
| 26352  | Ms Rosemary H Woolley  
| Baston Parish Council |

**Comment ID:** SASub30  
**Type:** Letter

### Summary of Comments
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.

### Officer's Response
noted
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<th>Consultee</th>
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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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<td></td>
<td>Sport England</td>
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**Comment ID:** SASub36  
**Type:** Letter

### Summary of Comments
Do you consider the DPD is Sound? = Yes

### Officer's Response
noted

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<tr>
<td>603273</td>
<td>Mr Kevin Foster</td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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<td></td>
<td>SE Lincolnshire Joint Strategic Planning Committee</td>
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</tbody>
</table>

**Comment ID:** SASub25  
**Type:** Letter

### Summary of Comments
Do you consider the DPD Legally Compliant? = Yes  
Do you consider the DPD is Sound? = Yes

### Officer's Response
noted.
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<th>Consultee</th>
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<tr>
<td>26304 Mr J M Mettham</td>
<td></td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
</tr>
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</table>

**Summary of Comments**
Concerned about the impact that the allocations and policies will have on the smaller villages of the District.

**Officer's Response**
Comments noted. Strategy for encouraging development in larger villages and restricting development in smaller villages is a fundamental part of the Core Strategy. This issue has, therefore, been considered through the Core Strategy preparation and examination process.

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<tr>
<td>497324 Mr Chris Evans Ministry of Defence</td>
<td></td>
<td>Site Allocation and Policies DPD: Submission October 2011</td>
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**Summary of Comments**
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.

**Officer's Response**
noted
Summary of Comments
Support criteria used for assessment of housing allocations, and suggest that land at Newstead would be suitable as an allocation.

Officer's Response
No change - site assessment provides robust evidence for site selection. Land east of Stamford was considered for allocation. As part of the site assessment process, a Landscape Sensitivity and Capacity Study was undertaken. This concluded that most of the land to the east of the town is of moderate to high sensitivity to development. There are also flood risk and access issues associated with some of the land to the east of the town, which will affect the capacity of the sites. The Stamford Transport Forecasting Results Report (prepared for Lincolnshire County Council) concluded that the urban extensions will result in significant expansion in housing and employment related development and general background traffic growth. Several scenarios were tested and the report concluded that Scenario 4b (urban extension on the western side of Stamford, south of Empingham Road, shows the best results in terms of overall journey times and average ravel speed in the Stamford network. It is considered that the allocated site, to the west of Stamford, offers the best means of satisfying the housing requirement for the town.
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<tr>
<td>607531</td>
<td>Mr Niall Shannon</td>
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<td>(1.2.1)</td>
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**Consultation Point**

**Summary of Comments**
Parish Councillors did not have authority to approve allocation of site.

**Officer's Response**
No change - site assessment process provides robust evidence for site selection. Parish Council comments at workshop sessions were only one part of the site selection process.

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<tr>
<td>603952</td>
<td>Mr Colin Wigginton</td>
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<td></td>
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<td>(1.2.1)</td>
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**Consultation Point**

**Summary of Comments**
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.

**Officer's Response**
Comments noted. Stamford Town Council response to Site Assessments was used to help inform decision-making about sites. The Town Council indicated the allocated site would be the best option for development. The Chamber of Trade and Commerce made representations throughout the process and these have been considered. The SKDC Council meeting followed the procedure set out in its constitution.
## Summary of Comments and SKDC Response

### Consultee
**474396  Mr Gordon Smith**

**Comment ID:** SASub144  
**Type:** E-Mail

#### Officer's Response
A Study of Open Space, Sport and Recreation in South Kesteven District (April 2009) and South Kesteven Green Infrastructure Strategy (April 2009) are already included.

### Consultee
**490730  Mr Alan Hubbard**  
The National Trust

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

#### Officer's Response
Add Belton Setting Study (jointly commissioned with National Trust) to list of Background Evidence - Proposed Change SKSAP3.
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<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

**Summary of Comments**  
Recommend inclusion of a policy to reflect Policy HE4 of GAAP [setting of Belton House].

**Officer's Response**  
No change. Belton House study forms part of Background Evidence, and will, therefore, be considered when assessing land for allocation or when determining planning applications, particularly as EN1 refers to protecting important assets. It may, however, be considered appropriate to include a policy similar to HE4 of the GAAP as a modification.

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<tr>
<td>26277  Jenny Young</td>
<td>Heritage Trust for Lincolnshire</td>
<td>Paragraph (2.1.1)</td>
</tr>
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</table>

**Comment ID:** SASub75  
**Type:** Web

**Summary of Comments**  
Wants changes to wording of Vision in line with PPS5.

**Officer's Response**  
The Site Allocation and Policies DPD has the same Vision as the Core Strategy. This vision has been adopted with the Core Strategy. It would, therefore, be inappropriate to amend it in the DPD.
Summary of Comments
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.

Officer's Response
Typographical error. The number of new homes required has been corrected as a proposed minor change (SKSAP6). Correct figure is 5940, which is the total of the Core Strategy figures for Stamford, Bourne, Deepings, LSCs and Rural Areas in Policy H1.

Summary of Comments
seeks clarification on number of dwellings required to be delivered.

Officer's Response
Typographical error. The number of new homes required has been corrected as a proposed minor change (SKSAP6). Correct figure is 5940, which is the total of the Core Strategy figures for Stamford, Bourne, Deepings, LSCs and Rural Areas in Policy H1.
### Summary of Comments

**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.

**Officer's Response**

Comments noted. The GI study is referenced in para 1.4.5. However, an explanation of GI could be added to the glossary as a minor change.

---

**Summary of Comments**

We welcome reference to protecting and enhancing historic assets and archaeology as part of Objective 8 (although to ensure consistency with PP55, "heritage assets" would be more appropriate), and we welcome reference to the historic environment as part of Objective 11 on green infrastructure.

**Officer's Response**

Proposed change SKSAP7 suggests that Objective 8, bullet 4 is changed to read "heritage assets".
### Summary of Comments and SKDC Response

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<th>Consultee</th>
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<tbody>
<tr>
<td>605795 Stamford Property Company Ltd</td>
<td>396969 Mr Matthew Bagnall</td>
<td>Paragraph (2.2.1)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub95  
**Type:** Web

**Summary of Comments**
Support for objectives 1, 2, 8, 9, 10 & 11.

**Officer's Response**
support welcomed

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<th>Consultee</th>
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<tr>
<td>475706 Lincolnshire Wildlife Trust</td>
<td>396969 Mr Matthew Bagnall</td>
<td>Paragraph (2.2.1)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub87  
**Type:** Web

**Summary of Comments**
The Lincolnshire Wildlife Trust strongly supports Objectives 8 and 11.

**Officer's Response**
support welcomed.
### Summary of Comments

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.

### Officer's Response

No change - allocation of land at Stamford accords with the Core Strategy requirement for residential development in Stamford to 2026. Any proposals in historic core will need to be reflective of that location in the historic setting.

---

### Summary of Comments

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.

### Officer's Response

comment noted. Employment opportunities do exist in Stamford. However, they have been restricted over recent years. It is an important element of the Core Strategy to provide for additional employment opportunities within the town to try to reduce out-commuting.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<th>Consultee</th>
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<tr>
<td>26277 Jenny Young</td>
<td>Heritage Trust for Lincolnshire</td>
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Comment ID: SASub76  
Type: Web

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

Officer’s Response  
Proposed change SKSAP8 suggests the following words: "The many archaeological remains (both designated and undesignated) throughout the town are among its attraction" are added after first sentence.

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<tr>
<td>605036 Mrs Lisa Staunton</td>
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Comment ID: SASub45  
Type: Web

Summary of Comments  
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.

Officer’s Response  
no change - site assessment provides robust evidence for site selection. The Stamford Transport Forecasting Results Report (prepared for Lincolnshire County Council) concluded that the urban extensions will result in significant expansion in housing and employment related development and general background traffic growth. Several scenarios were tested and the report concluded that Scenario 4b (urban extension on the western side of Stamford, south of Empingham Road, shows the best results in terms of overall journey times and average ravel speed in the Stamford network.
Summary of Comments
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.

Officer's Response
Concerns noted, however the adopted Core Strategy for the District requires land for both housing and employment development to be located where people can cycle and/or walk.

Summary of Comments
Welcome the fact that the Plan does not seek to rigidly restrict its scope to 500 new homes at Stamford. The DPD does not attempt to consider the actual need for development. Therefore it does not conform to national planning guidance (especially the NPPF).

Officer's Response
Comments noted. NPPF is only in draft at this time. Need for development has been established within the adopted Core Strategy. This is considered an appropriate basis for the SAP DPD allocations.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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

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

**Officer's Response**  
Proposed change SKSAP9 corrects the housing numbers in Stamford.

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<td>487941 Mr M Newton Boyer Planning</td>
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<td>Paragraph (3.1.12)</td>
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**Comment ID:** SASub194  
**Type:** E-Mail

**Summary of Comments**  
Text does not show the conclusions of Stamford Traffic Model.

**Officer's Response**  
Stamford Traffic Model is part of background evidence to support the site allocations, it does not need repeating within the plan itself.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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

**Summary of Comments**  
Concerns about impact of works necessary to obtain required visibility splays.

**Officer's Response**  
development brief will include details of junctions/ layouts and works required. These will need to be approved by the Highway Authority.

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</table>
| 487941    | Mr M Newton  
Boyer Planning | Paragraph (3.1.14) |

**Comment ID:** SASub196  
**Type:** E-Mail

**Summary of Comments**  
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.

**Officer's Response**  
Changes have been made to the text to reflect the recommendations of the WCS published in November 2011. The phasing of development also allows for the maintenance of a continuous 5 year supply of housing land across the plan period. Adoption of the DPD will help increase 5 year supply through the provision of a range of allocated sites across the District. This is in accordance with the provisions of the Core Strategy, especially para 5.1.6 to maintain a continuous 5 year supply of deliverable land.
### Summary of Comments

Mr Paul Huyton endorses 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.

### Summary of Comments

Jenny Young from the Heritage Trust for Lincolnshire notes an Historic Landscape Character Assessment has recently been completed for the county. Reference could be made throughout the document on this.

### Summary of Comments

Officer's Response

Officer's Response noted.

Officer's Response

Noted. However, it is unclear what benefits there would be from this suggestion.
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

### Consultee: Mr M Newton, Boyer Planning

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### Summary of Comments
The findings of the Landscape Sensitivity and Capacity Study should be included, to demonstrate how it has been used to inform site selection. Suggested wording includes justification for Clients' Empingham Road site.

### Officer's Response
The text is a statement of the fact that a Landscape Sensitivity and Capacity Study was prepared and that its findings have been taken into account when assessing the suitability, or otherwise, of sites for allocation. The document is identified in the list of background evidence [para 1.4.5] and is available on the Council's website, and, where appropriate, requirements included in policies eg STM3. It is not considered necessary, or appropriate, to provide details of its conclusions in respect of specific sites in the general text.

### Consultee: Mrs Lisa Staunton

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<th>Comment ID: SASub50</th>
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### Summary of Comments
CEG have stated that properties will be in line with those on Tinwell Road, not affordable housing by any standard.

### Officer's Response
Comment noted. Allocation STM3 and policy H3 of the Core Strategy require that up to 35% of the site's capacity should be "affordable", ie liable for social rent or shared ownership to local people in housing need.
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>372928 Mr Tom Gilbert-Wooldridge</td>
<td>English Heritage</td>
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**Consultation Point**

Allocations (3.1.1)

**Comment ID:** SASub57  
**Type:** Web

### Summary of Comments

Welcome decision not to allocate ADD41 (Priory Road) and STAM14, 15, 16 & 17 (Newtead).

**Officer's Response**

Comments noted. Representation SASub157 continues to promote the site (ADD41) through this Examination.

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<tr>
<td>603952 Mr Colin Wigginton</td>
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**Consultation Point**

Paragraph (3.1.1.1)

**Comment ID:** SASub74  
**Type:** Web

### Summary of Comments

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. Traffic Model conclusions were used to help inform the decision-making process.

**Officer's Response**

No change - site assessment provides robust evidence for site selection. There is no commitment to a ring road and no defined route. Consideration of all the suggested sites concluded that, on balance, the allocated site was the best option for addressing the housing and employment needs of the town.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
<td>Paragraph (3.1.2.1)</td>
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<tr>
<td>Bidwells</td>
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</table>

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

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

### Officer's Response
Proposed change SKSAP9 corrects the housing numbers in Stamford.

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<tr>
<td>487941</td>
<td>Mr M Newton</td>
<td>Policy STM1: Housing Allocations in Stamford</td>
</tr>
<tr>
<td>Boyer Planning</td>
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**Comment ID:** SASub227  
**Type:** E-Mail

### Summary of Comments
Would like phasing removed from policy.

### Officer's Response
The phasing of allocations is designed to enable a continuous supply of housing land throughout the District. It takes into account information about the availability of sites, and the provision of infrastructure, as expressed in the response by Peterborough City Council [SASub19]. Where further information becomes available, it may be necessary to revise this. Changing phasing may have impacts beyond the District, eg Peterborough and Rutland. However, the need to ensure a continuing 5year supply of housing land is an important element of the phasing policy.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee: 597902 Mr Harjinder Kumar
Agent: 597895 Mr Harjinder Kumar
Peterborough City Council

Consultation Point: Policy STM1: Housing Allocations in Stamford

Comment ID: SASub19
Type: Web

Summary of Comments
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.

Officer’s Response
no action - support for DPD
Consultee  
372928  Mr Tom Gilbert-Wooldridge  
English Heritage  

Consultation Point  
Policy STM1: Housing Allocations in Stamford  

Comment ID: SASub58  
Type: Web  

Summary of Comments  
No objection to principle of allocating any of the sites referred to in Policy STM1. However, STM1a and STM1d form part of approach to historic core of Stamford and will need to be carefully designed to avoid negative impacts. Request inclusion of development criteria (such as in STM3) for these sites.  

Officer's Response  
It is not considered necessary to include additional criteria, as all development must also accord with other policies. Core Strategy policy EN1 requires consideration of environmental, heritage and landscape factors.
Consultee: Mr Jeremy Dawson
Agent: Strutt and Parker
Comment ID: SASub157
Type: E-Mail

Summary of Comments:
Wants client's site [ADD41 - Priory Road, Stamford] included as an allocation.

Officer's Response:
No change. It was considered that the site may be suitable for a small scheme, avoiding flood zone and Scheduled Monument, provided that Highway Authority concerns can be overcome. However, English Heritage expressed concerns that any development would impact on the setting of the adjacent Priory. At the time of the assessment English Heritage confirmed that no request had been received to remove the site from the list of Scheduled Monuments. However, an application has now been made to de-schedule the site. The decision of English Heritage about this application is expected this spring.
Summary of Comments
RUT1 should be acknowledged as a suitable site for Stamford development.
RUT1 should be the subject of a Joint AAP with Rutland CC.

Officer’s Response
There is no provision within Rutland CC’s recently adopted Core Strategy to accommodate a large amount of housing or employment on its boundary with Stamford, and no apparent appetite to consider development in this location. The site assessment process undertaken concludes that the site allocated as STM3 is preferable for allocation to meet the housing needs of the town for this plan period. The site is being promoted through Rutland Allocations DPD.
# Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<th>Consultee</th>
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<tr>
<td>549250 Mr John Burton</td>
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<td>STM1a</td>
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### Summary of Comments
concerns about: overlooking/loss of privacy, traffic impact, loss of open countryside. Also that if developed this would give rise to further plans for development of adjacent fields. High density modern housing within metres of historic houses on High Street St Martins is 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.

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<tr>
<td>463930 Mr P West and Mrs S Wilson</td>
<td>34334 Ms Justine Bailey Smiths Gore</td>
<td>STM1a</td>
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</table>

### Summary of Comments
Support for site (on behalf of owners).

### Officer's Response
no change - site assessment provides robust evidence for site selection. Core Strategy Policy EN1 ensures that landscape and environmental impacts are considered before development, and that new development respects the historic character of the area. Phasing linked to redevelopment and relocation of Stamford AFC.

### Summary of Comments
no action required - support for site
Summary of Comments
Concerned about traffic impact of development on Kettering Road, especially during peak periods. Concerned about loss of green space and footpaths. The fields provide a welcome break between Stamford, Wothorpe and the A1. Development would be another encroachment on green areas.

Officer's Response
no change - site assessment provides robust evidence for site selection. Core Strategy Policy EN1 ensures that landscape and environmental impacts are considered before development.
Summary of Comments
Wants allocation increased to include client's land

Officer's Response
This site was not suggested for consideration in the early preparation stages. It has not been the subject of public consultation, or the full site assessment process. Evidence submitted in support of the representation would suggest that the site might be suitable for allocation. However, consultation and site assessment have not been undertaken. Since receiving this response, the Highways Authority has been consulted and has expressed concerns about the cumulative impact which would result from the development of this site and the adjacent site (STM1a) as well as the redevelopment of the Football Club site (STM1d). Mitigation works have been proposed for the redevelopment of site STM1d and the Highways Authority is concerned that these will be negated by further development.
# Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tbody>
<tr>
<td>605511</td>
<td>Mrs Linda Cross</td>
<td>605511 DLP Planning Ltd</td>
</tr>
<tr>
<td>396969</td>
<td>Mr Matthew Bagnall</td>
<td>STM1b</td>
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</table>

**Comment ID:** SASub72  
**Type:** Web

**Summary of Comments**
Do you consider the DPD Legally Compliant? = Yes  
Do you consider the DPD is Sound? = Yes

**Officer's Response**
Support noted.

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<tr>
<td>294235</td>
<td>Mr Mark Mann</td>
<td>294235 Savills</td>
</tr>
<tr>
<td>396969</td>
<td>Mr Matthew Bagnall</td>
<td>STM1c</td>
</tr>
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**Comment ID:** SASub220  
**Type:** Letter

**Summary of Comments**
Support allocation but 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.

**Officer's Response**
Support welcomed. Policy makes it clear that 50 houses is indicative.
**Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response**

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<th>Consultee</th>
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<tr>
<td>407064  Mr Philip Williams Ryhall Road Residents Association</td>
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<td>STM1d</td>
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**Comment ID:** SASub32  
**Type:** Letter

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**Summary of Comments**
Object to development of Kettering Road, Barnack Road and Ryhall Road sites. Agree with comments about traffic congestion on Kettering Road and in the town centre: Town bridge already gridlocked.

**Officer's Response**
The site assessment provides robust evidence for the selection of sites. There is no proposal to allocate land at Barnack Road and Ryhall Road, although these sites are the subject of planning applications. It is proposed to allocate two sites on Kettering Road. Both sites are well located with respect to the town and will provide a modest amount of development, to address the needs of the town. Allocation STAM1d is the site of the Stamford football club, who wish to relocate to create better, more up-to-date facilities. The development of this site is dependant upon this relocation. Assessment by the Highway Authority concluded that improvement works would be required in this location, but these would meet the needs of additional development.
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<tr>
<td>487941</td>
<td>Mr M Newton</td>
<td>STM1e (and STM3)</td>
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<td>Boyer Planning</td>
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**Comment ID:** SASub228  
**Type:** E-Mail

**Summary of Comments**
wants additional supporting text (or an appendix) drawn from Council's evidence base and information supplied by developer to demonstrate justification for allocation. *(suggested text provided)*

**Officer's Response**
Evidence is contained within background evidence; it is not necessary to repeat this within the DPD.
Empingham Road site is not the most suitable to deliver Stamford’s housing requirement. 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.

Officer’s Response
No change - site assessment provides robust evidence for site selection. Land east of Stamford was considered for allocation. As part of the site assessment process, a Landscape Sensitivity and Capacity Study was undertaken. This concluded that most of the land to the east of the town is of moderate to high sensitivity to development. There are also flood risk and access issues associated with some of the land to the east of the town, which will affect the capacity of the sites. The Stamford Transport Forecasting Results Report (prepared for Lincolnshire County Council) concluded that the urban extensions will result in significant expansion in housing and employment related development and general background traffic growth. Several scenarios were tested and the report concluded that Scenario 4b (urban extension on the western side of Stamford, south of Empingham Road, shows the best results in terms of overall journey times and average ravel speed in the Stamford network. It is considered that the allocated site, to the west of Stamford, offers the best means of satisfying the housing requirement for the town.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee  
605036  Mrs Lisa Staunton

Agent

Consultation Point

STM1e (and STM3)

Comment ID: SASub51
Type: Web

Summary of Comments
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.

Officer’s Response
The development brief, or detailed planning application, required must meet the policy criteria. These include landscaped corridor and other green infrastructure requirements. The availability of brownfield sites in Stamford is very limited. Those which are available have been considered and, where appropriate, allocated for redevelopment.
Summary of Comments
RUT1 should be identified as suitable for meet Stamford development needs. RUT1 should be the subject of a joint AAP with Rutland CC.

Officer's Response
The site assessment process provides robust evidence for site selection. This site lies in Rutland and is outside this Council’s administrative area. Allocation would, therefore, require preparation of a joint plan with Rutland CC. There is no provision within Rutland CC’s recently adopted Core Strategy to accommodate a large amount of housing or employment on its boundary with Stamford, and no apparent appetite to consider development in this location. The site assessment process undertaken concludes that the site allocated as STM3 is preferable for allocation to meet the housing needs of the town for this plan period.
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>372928</td>
<td>Mr Tom Gilbert-Wooldridge</td>
<td>Policy STM2: Employment Allocations in Stamford</td>
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<td>English Heritage</td>
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**Comment ID:** SASub59  
**Type:** Web

### Summary of Comments
No objection to principle of allocating any of the sites referred to in Policy STM2. However, there are historic environment issues with STM2a and STM2c. Request inclusion of development criteria (re need to preserve and enhance the significance and setting of nearby designated heritage assets) for these sites.

**Officer's Response**
It is not considered necessary to include additional criteria, as all development must also accord with other policies. Core Strategy policy EN1 requires consideration of environmental, heritage and landscape factors.

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<td>294235</td>
<td>Mr Mark Mann</td>
<td>STM2b</td>
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<td>Savills</td>
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**Comment ID:** SASub221  
**Type:** Letter

### Summary of Comments
Support allocation but 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.

**Officer's Response**
support welcomed. Policy clearly states that the site capacity for all allocations is indicative.
Empingham Road site not the most suitable to deliver Stamford’s housing requirement. 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.

Officer’s Response
No change - site assessment provides robust evidence for site selection. Land east of Stamford was considered for allocation. As part of the site assessment process, a Landscape Sensitivity and Capacity Study was undertaken. This concluded that most of the land to the east of the town is of moderate to high sensitivity to development. There are also flood risk and access issues associated with some of the land to the east of the town, which will affect the capacity of the sites. The Stamford Transport Forecasting Results Report (prepared for Lincolnshire County Council) concluded that the urban extensions will result in significant expansion in housing and employment related development and general background traffic growth. Several scenarios were tested and the report concluded that Scenario 4b (urban extension on the western side of Stamford, south of Empingham Road, shows the best results in terms of overall journey times and average ravel speed in the Stamford network. It is considered that the allocated site, to the west of Stamford, offers the best means of satisfying the housing requirement for the town.
Summary of Comments
seeks amendments to wording: 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". To provide greater flexibility.

Officer's Response
Policy STM3 has been amended to read "14ha" for for consistency with policy STM2. (Proposed minor change SKSAP13)

Summary of Comments
Object to allocation. Development should be on eastern side of town.

Officer's Response
The policy requires the preparation of a masterplan. This will address the landscape and setting principles of policy EN1 to ensure protection of historic assets and environment.
Summary of Comments
The western development has no merit and no benefits: it is a greenfield site, 400 houses would distort the uneven expansion of Stamford towards the west causing more commuter traffic into town, there is good brownfield land to the east of the town centre which would provide more balance to the town and provide opportunities for a start on a relief road.

Officer's Response
Brownfield sites in the town are very limited: those which are available have been assessed as part of the allocation process. Where suitable and available, brownfield sites have been allocated. There is no commitment to a ring road and no defined route. This was considered in detail at the Core Strategy examination. The policy requires the preparation of a masterplan. This will address the landscape and setting principles of policy EN1 to ensure protection of historic assets and environment.

Summary of Comments
seeks additional text: “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.”

Officer's Response
The policy requires the provision of a masterplan for development, which is to be prepared in consultation with the local community. This is to ensure that the concerns will be addressed to the satisfaction of all interested parties. However, the suggested wording could be accepted as an appropriate addition.
Summary of Comments
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.

Officer's Response
comments noted.

Summary of Comments
Disagrees with conclusions of Jacobs transport assessment (best site not part of Urban Extension site). 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.

Officer's Response
No one single piece of evidence has been used to determine which site to allocate. All sites have been assessed using the same criteria. The Council decided that, on balance, the proposed allocation would have less of an impact upon highway capacity issues; landscape and setting; ecology; flood risk and was of an appropriate scale to meet the identified housing and employment needs of the town.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee
487941  Mr M Newton
Boyer Planning

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

Comment ID: SASub233
Type: E-Mail

Summary of Comments
seeks additional wording to supporting text and amendments to policy: New section entitled "Major Mixed-use Allocation" to justify mixed use allocation. "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)."

Officer's Response
It is considered that the site assessment process provides robust evidence of site selection. The policy has been amended for consistency and now requires "14 ha of land for ... employment use including a 10ha high quality ... business park". (proposed minor change SKSAP13). The Core Strategy establishes the requirement and provides the justification for a mixed-use allocation.

Consultee
487941  Mr M Newton
Boyer Planning

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

Comment ID: SASub234
Type: E-Mail

Summary of Comments
seeks changes to wording of 3rd bullet to remove reference to "landscaped corridor"

Officer's Response
It is not considered that the wording of the masterplan principles in relation to landscaping are overly prescriptive in terms of layout. The masterplan is to be prepared in consultation with the local community, members of which have already raised concerns that no such corridor will be provided.

09/03/2012
### Summary of Comments

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.

### Officer's Response

Support welcomed.

---

### Summary of Comments

Affordable housing requirement not in accordance with adopted Core Strategy - seeks changes to wording: "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."

### Officer's Response

The policy includes provision of 400 houses, of which 140 should be affordable homes. This is 35% of the provision, which accords with Core Strategy policy. Could remove "at least" from policy, so it reads "including 140 affordable homes".
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

**Consultee**  
487941  Mr M Newton  
Boyer Planning

**Agent**

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

**Comment ID:** SASub237  
**Type:** E-Mail

#### Summary of Comments

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.

**Officer's Response**

support welcomed.

---

**Consultee**  
487941  Mr M Newton  
Boyer Planning

**Agent**

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

**Comment ID:** SASub238  
**Type:** E-Mail

#### Summary of Comments

seeks replacement of bullet point 7 with the following:

- 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.

**Officer's Response**

comments noted, however no change is proposed as the suggestion adds little to the policy.
Summary of Comments
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.

Officer's Response
noted.

Summary of Comments
seeks removal of wording relating to phasing of development.

Officer's Response
The phasing of allocations is designed to enable a continuous supply of housing land throughout the District. It takes into account information about the availability of sites, and the provision of infrastructure.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>557675</td>
<td>Mr Stuart Dolby</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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**Summary of Comments**
We 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'.

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<tr>
<td>482965</td>
<td>Mr Chris Briance</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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<td>Comment ID:</td>
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**Summary of Comments**
Development not needed. Stamford needs ring road and more car parking spaces before any further development is permitted.

**Officer's Response**
No change - site assessment provides robust evidence for site selection.

**Officer's Response**
No change - The Core Strategy establishes development need for Stamford, and the site assessment provides robust evidence for site selection. The Local Transport Plan does not include provision for a ring road around Stamford. No route is defined and no funding committed. This issue was considered at the Core Strategy examination.
### Summary of Comments

**Consultee**: Site should not be developed because of landscape quality, setting on the town of Stamford, traffic impacts and location of facilities (schools, hospital, retail) on the eastern side of town. Suggests that Casterton and Stamford should be treated jointly and that Williamson Cliffe sites at Casterton would be more appropriate site for development (although in Rutland). Brownfield sites should be re-examined.

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

**Agent**: Officer's Response

The policy requires the preparation of a masterplan. This will address the landscape and setting principles of policy EN1 to ensure protection of historic assets and environment. Core Strategy Policy EN1 ensures that landscape and environmental impacts are considered before development. Brownfield sites within the town are very limited, and those which are available have been assessed as part of the process. Where suitable and available, brownfield sites have been allocated.

### Summary of Comments

**Consultee**: Site should not be developed because of landscape quality, impact on setting of Stamford, traffic impacts and location of facilities (schools, hospital, retail) on eastern side of town. All brownfield options within the current boundary of Stamford should be reconsidered.

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

**Agent**: Officer's Response

Brownfield sites in the town are very limited: those which are available have been assessed as part of the allocation process. Where suitable and available, brownfield sites have been allocated. The policy requires the preparation of a masterplan. This will address the landscape and setting principles of policy EN1 to ensure protection of historic assets and environment.
### Summary of Comments

Development of site will result in pressure on town infrastructure and cause road congestion: retail premises, schools, medical facilities are all more accessible from the east. 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.

### Officer's Response

The site has been allocated following site assessment process which provides robust evidence for site selection. The availability of brownfield sites in Stamford is very limited. Those which are available have been considered and, where appropriate, allocated for redevelopment. All sites have been assessed using the same criteria. The Council decided that, on balance, the proposed allocation would have less of an impact upon highway capacity issues; landscape and setting; ecology; flood risk and was of an appropriate scale to meet the identified housing and employment needs of the town.
Summary of Comments
seeks removal of bullet point 9 - "Provision of necessary infrastructure improvements required to support the development, including improvements to the waste water transmission network".

Officer's Response
Do not agree. The Water Cycle Study has identified that there are constraints to water infrastructure which may affect this development. It is important that these issues are "flagged" up to potential developers to ensure that they are properly addressed through the planning application process.

Summary of Comments
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.

Officer's Response
Addition to policy text included in Schedule of Changes: to include Travel Plans as part of masterplan process. (SKSAP14)
### Consultee
559479  Ms Anna Russo

### Agent

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

#### Comment ID: SASub166  
**Type:** Letter

#### Summary of Comments
against development. too close to A1 and will cause congestion (both in town centre and on A1). Supporting infrastructure needed.

#### Officer's Response
No change - site assessment provides robust evidence for site selection. The policy criteria include provision for appropriate infrastructure and local facilities.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee  
260968  Mr Tim Lee  
Stamford Chamber of Trade and Commerce

Comment ID: SASub100  
Type: E-Mail

Summary of Comments  
Stamford should be developed on the east side and a ring road route provided/protected. Object to the urban extension to the West of the town

Officer’s Response  
No change - The issue of a ring road or relief road for Stamford was considered in detail by the Inspector at the Core Strategy examination. She concluded that the road would not be provided within the plan period as there was no commitment to such a scheme by the Highway Authority, therefore no public funding was available and no definitive routes were available, nor had the HA confirmed that a new road was the best solution. She also concluded that it was not appropriate to make provision for safeguarding of a route. The site assessment process is considered robust, and considered all the sites which were proposed and available for development. The larger area of brownfield land to the east of the town is allocated for housing (STM1c) and the other parcels of land to the east of Stamford referred to in the representation are constrained by highway and flood risk issues.
<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>26084 Mrs Margaret Chirico</td>
<td></td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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</tbody>
</table>

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

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

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

**Summary of Comments**
objects to allocation of site.

**Officer's Response**
No change - it is considered that the site assessment provides robust evidence of site selection.

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<tr>
<th>Consultee</th>
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<tbody>
<tr>
<td>559484 Mr &amp; Mrs Steve &amp; Val Brown</td>
<td></td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub169  
**Type:** Letter

**Summary of Comments**
Oppose site for development which would include industry and sheds. Loss of green space in agricultural use, attractive approach and setting for Stamford. Also impact on traffic congestion and road safety adjacent to school. Site previously protected and has important role in defining the setting and views of the town.

**Officer's Response**
No change - site assessment provides robust evidence for site selection. The policy criteria include landscape/green infrastructure provisions, high standards of sustainable design and construction for all buildings. Development is to be residential and high quality business park incorporating B1 and B2 uses, not heavy industry and storage.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee
517670  Natural England
Natural England

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

Comment ID: SASub206
Type: E-Mail

Summary of Comments
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: Energy efficiency: Renewable energy: Design: 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.

Officer's Response
The policy requires the preparation of a masterplan. It is considered that the principles which will govern the masterplan will satisfy the concerns expressed by Natural England. In addition, policy EN4 of the Core Strategy covers this issue for all types of development.
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
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<tbody>
<tr>
<td>26085</td>
<td>Mr John B Gibson</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
</tr>
<tr>
<td><strong>Comment ID:</strong> SASub203</td>
<td><strong>Type:</strong> Letter</td>
<td></td>
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</table>

### Summary of Comments
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.

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<th>Consultee</th>
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<tbody>
<tr>
<td>417569</td>
<td>Mr Malcolm Brandwood</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
</tr>
<tr>
<td><strong>Comment ID:</strong> SASub164</td>
<td><strong>Type:</strong> Letter</td>
<td></td>
</tr>
</tbody>
</table>

### Summary of Comments
Development at wrong side of Stamford. Ring road needed.

### Officer's Response
No change - the site assessment provides robust evidence of site selection.

### Officer's Response
The Council has considered development options to the east, west and north of Stamford, and on balance concluded that the allocated site is the best option. The issue of the ring road was considered at the Core Strategy examination [para 3.78 of the Inspector’s report].
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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<tbody>
<tr>
<td>26053</td>
<td>Mr &amp; Mrs B &amp; P Till</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub16  
**Type:** Letter

### Summary of Comments
Site should be protected for its landscape value and not developed.

### Officer's Response
no change - site assessment provides robust evidence for site selection. Policy includes landscaping and environmental criteria and Core Strategy Policy EN1 ensures landscape and environmental impacts are considered before development. Landscape was considered as part of the assessment process and the Landscape Sensitivity and Capacity Study looked at each of the sites considered.

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<tr>
<th>Consultee</th>
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<tbody>
<tr>
<td>603952</td>
<td>Mr Colin Wigginton</td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub35  
**Type:** Web

### Summary of Comments
Area should be protected because of its prominent location on a main approach to the town. Concerns because of traffic impact. Concerns about developer's proposals, which ignore Council requirements.

### Officer's Response
Concerns noted. No change - site assessment provides robust evidence for site selection. The policy requires the preparation of a masterplan. It is considered that the principles which will govern the masterplan will ensure that these concerns are addressed. Core Strategy Policy EN1 ensures that landscape and environmental impacts are considered before development.
Summary of Comments
Site not suitable because: landscape value, important for setting of Stamford, majority of retail outlets on eastern side of town and traffic impact. 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.

Officer's Response
The policy requires the preparation of a masterplan. This will address the landscape and setting principles of policy EN1 to ensure protection of historic assets and environment.
Consultee 487941  Mr M Newton
Boyer Planning

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

Comment ID: SASub241
Type: E-Mail

Summary of Comments
seeks replacement of bullet point 10 with:- â€œEnsures that the development incorporates sustainable design and construction principles within the proposed buildings on the site to reduce the energy demand of the developmentâ€.
seeks expanded policy text. Suggest additional paragraph:- â€œThe 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 â€™Very goodâ€™ for commercial buildings, unless it can be demonstrated that this is not financially viableâ€.

Officer's Response
It is not considered that the suggested wording will add anything to the requirement for the highest standards of sustainable design and construction. Policy EN4 of the Core Strategy already makes this provision. However, wording could be included if it was felt it would strengthen rather than weaken the Council's ability to achieve sustainable development.
**Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response**

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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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<tbody>
<tr>
<td>407029 Mr Robert Conboy South West Approaches Group</td>
<td></td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub44  
**Type:** Letter

**Summary of Comments**
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 brownfield sites are available to the east of Stamford. We have over 200 members in the Protection Group from throughout Stamford and we intend to continue our objections through to a Public Enquiry.

**Officer's Response**
The site has been allocated following site assessment process which provides robust evidence for site selection. There is no greenbelt in SKDC, and the availability of brownfield sites in Stamford is very limited. Those which are available have been considered and, where appropriate, allocated for redevelopment. The impact of development on the landscape, setting and character of Stamford has been considered as part of the evidence base for the plan. Stamford Town Council’s response was that if greenfield sites were required to be allocated, this was the best option.

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<th>Consultee</th>
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<tr>
<td>605036 Mrs Lisa Staunton</td>
<td></td>
<td>Policy STM 3: Mixed Use Urban Extension site in Stamford</td>
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</table>

**Comment ID:** SASub48  
**Type:** Web

**Summary of Comments**
Contrary to government guidelines where development of brown field sites over green field sites.

**Officer's Response**
The site has been allocated following site assessment process which provides robust evidence for site selection. The availability of brownfield sites in Stamford is very limited. Those which are available have been considered and, where appropriate, allocated for redevelopment.
Summary of Comments
I disagree with these assessments. There is a very high sensitivity to development at the edge of these settlements. This is what a visitor first sees.

Officer's Response
The overall landscape character assessment is that the area around Bourne has a low to medium sensitivity. However, it is acknowledged that there are, within the character area, areas which have a higher sensitivity. The text is quite clear that "any new development around the edge of settlements should carefully consider the settlement edge."
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
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<th>Consultation Point</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>
<tr>
<td>Lindum Group</td>
<td>RDC</td>
<td></td>
</tr>
</tbody>
</table>

**Comment ID:** SASub139  
**Type:** E-Mail

#### Summary of Comments
Wants land off South Road, Bourne, identified for roadside services and other uses and referred to in 3.2.9.

#### Officer’s Response
This greenfield site lies to the south of Bourne immediately adjacent to and opposite existing residential development. It has an existing access point off the roundabout and has previously been considered suitable for roadside uses, with historic planning consents which include a public house/restaurant. The DPD includes an aspiration to improve the road connection between Cherryholt Road and South Road and allocates land to the east of the site for employment use (B1b). Part of the site has been granted planning permission for a public house and an undetermined application for a petrol filling station is likely to be determined soon. There is, therefore, no need to allocate this site.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>406572</td>
<td>26011</td>
<td>Policy B1: Employment Allocations in Bourne</td>
</tr>
<tr>
<td>Workplace Property</td>
<td>Mr Mike Sibthorp</td>
<td></td>
</tr>
<tr>
<td>Workplace Property</td>
<td>Mike Sibthorp Planning</td>
<td></td>
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</tbody>
</table>

**Comment ID:** SASub208  
**Type:** E-Mail

#### Summary of Comments
Re land at The Slipe. Considers that detail in Evidence Document is flawed and that site should be assessed as suitable for development and should be allocated for B1 employment use.

#### Officer's Response
No change - site assessment provides robust evidence for site selection. The fact that the site has planning permission is noted. However, sites with outstanding planning consent have not been allocated in the DPD.

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

**Comment ID:** SASub171  
**Type:** E-Mail

#### Summary of Comments
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.

#### Officer's Response
No change - site assessment provides robust evidence for site selection. The site cannot be developed until adjacent land has been developed, because there is no means of access to the public highway. This, and because there is sufficient employment land already identified, meant that the site was not allocated.
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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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<tbody>
<tr>
<td>26270 Miss Gill Brown</td>
<td>25977 Mr N Gough</td>
<td>B1a</td>
</tr>
</tbody>
</table>

**Summary of Comments**
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.

**Officer's Response**
It is not considered appropriate to allocate land specifically for C2 care accommodation, particularly where the need for such a proposal has not been established or justified. Proposals for care homes for the elderly will be considered on their own merits.

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<tr>
<th>Consultee</th>
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<tr>
<td>26579 Mr W Croft</td>
<td></td>
<td>B1c</td>
</tr>
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</table>

**Summary of Comments**
Concerns about type of business to be allowed in this location. Does not want industrial or factory units.

**Officer's Response**
The allocation is for high quality business park [B1 & B2 uses] and not heavy industry or factory units.
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

<table>
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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
<td>Paragraph (3.3.10)</td>
</tr>
<tr>
<td>Bidwells</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

### Summary of Comments
change wording to approximately 23ha of employment land at Deepings.

### Officer's Response
Suggested change is not considered to add anything to the DPD.

<table>
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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>605314</td>
<td>Annette Hewitson</td>
<td>Paragraph (3.3.15)</td>
</tr>
<tr>
<td></td>
<td>Environment Agency</td>
<td></td>
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</tbody>
</table>

**Comment ID:** SASub78  
**Type:** Web

### Summary of Comments
Should be updated to reflect findings of detailed WCS (November 2011).

### Officer's Response
Changes have been proposed which would update the DPD, where appropriate, in the light of the final detailed Water Cycle Study which was received in November 2011. However, it should be recognised that the WCS is a snapshot in time and continuing investigation by AWS and EA of potential constraints may mean that the cautionary approach set out in the WCS is not required for some locations.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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

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

**Summary of Comments**  
WCS should be published as part of Evidence Base.

**Officer's Response**  
Final Detailed Water Cycle Study published in November 2011. Amendments to the text have been made as a result of its recommendations. (see proposed changes WCS1-WCS16). Everyone has had an opportunity to comment on these documents.

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>605165</td>
<td>Mr A Jennings</td>
<td>Paragraph (3.3.20)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub183  
**Type:** Letter

**Summary of Comments**  
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.

**Officer's Response**  
The overall landscape character assessment is that the area around the Deepings has a low to medium sensitivity. However, it is acknowledged that there are, within the character area, areas which have a higher sensitivity. The text is quite clear that "any new development around the edge of settlements should carefully consider the settlement edge."
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<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
<td>Paragraph (3.3.21)</td>
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**Comment ID:** SASub112
**Type:** E-Mail

<table>
<thead>
<tr>
<th>Summary of Comments</th>
<th>Officer's Response</th>
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<tbody>
<tr>
<td>support.</td>
<td>support welcomed.</td>
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<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
<td>Paragraph (3.3.2.1)</td>
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**Comment ID:** SASub113
**Type:** E-Mail

<table>
<thead>
<tr>
<th>Summary of Comments</th>
<th>Officer's Response</th>
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<tbody>
<tr>
<td>700 dwellings (not 600 as stated).</td>
<td>should read 700, document to be amended. (see SKSAP19 in Schedule of Minor Changes)</td>
</tr>
</tbody>
</table>
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee  | Agent  | Consultation Point
---|---|---
26231  Mr D Bainbridge  | Bidwells | Policy DE1: Housing Allocations in The Deepings

Comment ID: SASub109
Type: E-Mail

Summary of Comments
WCS should be included in evidence base. Changes to the phasing of sites. [bring DE1d forward to 2011-2021].

Officer's Response
Changes have been proposed to update the DPD, where appropriate, in the light of the recommendations of the final detailed Water Cycle Study which was received in November 2011. (see proposed changes WCS1-WCS16). The WCS indicates that there are issues to be resolved. However, the response to a current planning application appears to indicate that these constraints can be overcome. An update WCS paper is to be prepared, for submission to the examination, to clarify the most up-to-date situation with regard to water cycle issues. It is not proposed to change the phasing as the phasing also allows a 5 year land supply.
Consultee: Mr Roger Smith
Agency: Savills
Consultation Point: Policy DE1: Housing Allocations in The Deepings

Summary of Comments
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.

Officer’s Response
No change - site assessment provides robust evidence for site selection. This site was considered as part of the site assessment process. However, it was not selected for allocation because development would encroach upon the open countryside. Part of the site, in the form of two smaller areas adjacent to Broadgate Lane, were also considered for allocation. These were rejected because of highway concerns.
Summary of Comments
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.

Officer's Response
no action - support for DPD

Summary of Comments
Frognall suitable location for development. Wants site allocated.

Officer's Response
No change - the site assessment process provides robust evidence for site selection. Frognall is a separate settlement, with no local facilities. That housing development has occurred here in the past is no justification for allowing additional development in an unsustainable location.
Summary of Comments
houses not needed - infrastructure unable to support.

Officer's Response
No change - site assessment provides robust evidence for site selection. Housing requirement has been establed by the adopted Core Strategy. Infrastructure capacity and capable of being improved.

Summary of Comments
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.

Officer's Response
It is not proposed to change the phasing. The WCS indicates that there are issues to be resolved. However, the response to a current planning application appears to indicate that these constraints can be overcome in a shorter timeframe than suggested by WCS. Phasing of development provides for 5 year supply as well as a means of trying to resolve infrastructure constraints.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>605314</td>
<td>Annette Hewitson</td>
<td>DE1b</td>
</tr>
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**Comment ID:** SASub80  
**Type:** Web

**Summary of Comments**
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.

**Officer’s Response**
It is not proposed to change the phasing. The WCS indicates that there are issues to be resolved. However, the site size is such that it is expected that these can be overcome.

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<tbody>
<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
<td>DE1d (DE3)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub107  
**Type:** E-Mail

**Summary of Comments**
Support for allocation.

**Officer’s Response**
support welcomed.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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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>DE1d (DE3)</td>
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**Comment ID:** SASub146  
**Type:** E-Mail

#### Summary of Comments
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.

#### Officer’s Response
Policy contains development brief requirements. These include requirement for "appropriately planned green infrastructure and landscaping" and provision of access to the site, as required by a detailed Traffic Assessment, from Peterborough Road and/or Towngate East, along with provision of infrastructure necessary to support the development. Policy also requires pedestrian and cycle route connections within and to the site.

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<th>Consultee</th>
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<th>Consultation Point</th>
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<tr>
<td>474396</td>
<td>Mr Gordon Smith</td>
<td>DE2a</td>
</tr>
</tbody>
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**Comment ID:** SASub148  
**Type:** E-Mail

#### Summary of Comments
East-west 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.

#### Officer’s Response
Policy contains development brief requirements. These include requirement for "appropriately planned green infrastructure and landscaping" and provision of access to the site, as required by a detailed Traffic Assessment, from Peterborough Road and/or Towngate East, along with provision of infrastructure necessary to support the development. The policy also requires development of a masterplan, in liaison with the local community.

09/03/2012
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tbody>
<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
<td>DE2b (DE3)</td>
</tr>
</tbody>
</table>

**Consultee**

**Agent**

**Consultation Point**

**Comment ID:** SASub111  
**Type:** E-Mail

**Summary of Comments**

Wants policy to read "up to" 6ha and "B1, B2 & B8 uses" removed.

**Officer's Response**

No change - however a change is proposed to policy DE3 to remove the "up to" for consistency (SKSAP20).

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<tr>
<th>Consultee</th>
<th>Agent</th>
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<tbody>
<tr>
<td>474396</td>
<td>Mr Gordon Smith</td>
<td>DE2b (DE3)</td>
</tr>
</tbody>
</table>

**Consultee**

**Agent**

**Consultation Point**

**Comment ID:** SASub147  
**Type:** E-Mail

**Summary of Comments**

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.

**Officer's Response**

Policy contains development brief requirements. These include requirement for "appropriately planned green infrastructure and landscaping" and provision of access to the site, as required by a detailed Traffic Assessment, from Peterborough Road and/or Towngate East, along with provision of infrastructure necessary to support the development.
Summary of Comments
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: Energy efficiency: Renewable energy: Design: 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.

Officer’s Response
The policy requires the preparation of a masterplan. It is considered that the principles which will govern the masterplan will satisfy the concerns expressed by Natural England.

Summary of Comments
I do not believe proposals in relation to DE1d (DE3) and DE2b (DE3) are suitable as they encroach on farm land 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.

Officer’s Response
no change - development will be contained within the area enclosed by the built settlement and the northern bypass, encroachment is not considered to be an issue.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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<tbody>
<tr>
<td>26231</td>
<td>Mr D Bainbridge</td>
<td>Policy DE 3: Mixed Use Urban Extension in Market Deeping</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub106  
**Type:** E-Mail

**Summary of Comments**  
support for allocation.

**Officer's Response**  
support welcomed.

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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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</thead>
<tbody>
<tr>
<td>26924</td>
<td>Mrs J Shield</td>
<td>Policy DE 3: Mixed Use Urban Extension in Market Deeping</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub160  
**Type:** Letter

**Summary of Comments**  
concerned that development at road frontage will "represent the area in a very good way".

**Officer's Response**  
Policy criteria, which includes requirement for a masterplan to be prepared in consultation with the local community, should ensure that the gateway to the town is treated sympathetically and that development reflects its location as a gateway to the town.
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<th>Consultee</th>
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<th>Consultation Point</th>
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<tbody>
<tr>
<td>605165  Mr A Jennings</td>
<td></td>
<td>Paragraph (3.4.1.4)</td>
</tr>
</tbody>
</table>

**Summary of Comments**

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.

**Officer's Response**

It is considered that some development is appropriate in LSCs to enable them to maintain their vitality and to meet a local need. This is part of the Spatial Strategy, included in the Core Strategy. The levels of development and growth are modest and should have a limited impact upon the countryside.

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<th>Consultee</th>
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<th>Consultation Point</th>
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<tr>
<td>605314  Annette Hewitson</td>
<td>Environment Agency</td>
<td>Paragraph (3.4.1.4)</td>
</tr>
</tbody>
</table>

**Summary of Comments**

Text should be amended to reflect the findings of the Detailed WCS, November 2011. Amended wording suggested.

**Officer's Response**

Suggested changes to the text to reflect the findings of the detailed WCS, November 2011 have been proposed as changes WCS1-WCS16.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tr>
<td>443969 Mr Andy Rogers</td>
<td>Capita Symonds</td>
<td>Paragraph (3.4.1.5)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub126  
**Type:** E-Mail

#### Summary of Comments
re: TA, already submitted in respect of application for site LSC1f Long Bennington.

**Officer’s Response**
comments noted.

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<th>Consultee</th>
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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 (3.4.2.1)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub127  
**Type:** E-Mail

#### Summary of Comments
comment that policy acknowledges the severe shortage of brownfield sites.

**Officer’s Response**
comments noted.
### Summary of Comments

#### Adjustments and Comments

- **Consultee**: Mr D Bainbridge
- **Agent**: Bidwells
- **Comment ID**: SASub118
- **Type**: E-Mail

**Summary of Comments**
Wants to include Baston as suitable for additional planned development.

**Officer’s Response**
No change - site assessment provides robust evidence for site selection. Village capacity assessment also used to consider suitability and desirability of LSCs for additional planned growth. Baston not considered suitable for development. There are numerous issues, including flood risk, and, at the time of assessment the Highway Authority said that there was no suitable means of access to the only site in the village which was not within the flood risk area. The Parish Council has supported this assessment via representation SASub30.

---

- **Consultee**: Mr Andy Rogers
- **Agent**: Capita Symonds
- **Comment ID**: SASub128
- **Type**: E-Mail

**Summary of Comments**
support for assessment of LSC capacity

**Officer’s Response**
support noted.
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
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<tr>
<td>402634 Mr Rex Hill</td>
<td></td>
<td></td>
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<tr>
<td>590493 Mr Daniel Hewett</td>
<td>150520 Mr Daniel Hewett</td>
<td>Paragraph (3.4.3.2)</td>
</tr>
</tbody>
</table>

### Comment ID: SASub167
**Type:** Letter

#### Summary of Comments
Support for no development in Baston.

#### Officer's Response
Support welcomed.

### Comment ID: SASub4
**Type:** Web

#### Summary of Comments
Greater preference should be given to directing growth to LSCs. A range of allocations should be included in LSCs (including greenfield sites which are well related to settlement). [specific reference to Billingborough]

#### Officer's Response
No change - because of the number of recent completions and outstanding commitments it is not considered necessary to allocate land in all LSCs. An assessment process has been carried out to consider the ability of villages to accommodate new development. This village capacity assessment, together with the site assessment, has informed site selection process.
Summary of Comments
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'.

Officer's Response
There is already high level of completions and commitments in the LSCs. This means that only a small amount of additional housing is required in these locations, to meet the Spatial Strategy and Housing Policy (SP1 and H1) of the Core Strategy. Para 5.1.6 of the Core Strategy makes it clear that it is not expected to make an allocation in each LSC and that a clear and consistent approach to assessing the ability of each village to absorb new development, the need for development and the scale of development built or committed will be undertaken. This has been carried out and is evidenced by documents already submitted to the examination. Further clarification of the process undertaken can be provided if required. Over-providing housing in the LSCs to compensate for a possible under-delivery (which in itself is not evidenced) in the towns is not in accordance with SP1 and H1 of the Core Strategy, neither would it conform with the provisions of para 5.1.7 which consider the Council's contingencies for addressing an under-delivery of housing land.
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<tr>
<td>443969</td>
<td>Mr Andy Rogers</td>
<td>Capita Symonds</td>
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**Comment ID:** SASub129  
**Type:** E-Mail

**Summary of Comments**  
Because the Council has only a 4 year supply of housing land, the respondent recommends that the Council seeks to make further allocations in addition to those already selected within the LSCs.

**Officer's Response**  
It is acknowledged that the Council cannot demonstrate a five-year housing land supply at this time. The phasing of development allows for the maintenance of a continuous 5 year supply of housing land across the plan period. Adoption of the DPD will help increase 5 year supply through the provision of a range of allocated sites across the District. This is in accordance with the provisions of the Core Strategy, especially para 5.1.6 to maintain a continuous 5 year supply of deliverable land.

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<tr>
<td>443969</td>
<td>Mr Andy Rogers</td>
<td>Capita Symonds</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub130  
**Type:** E-Mail

**Summary of Comments**  
support inclusion of LSC1f in first delivery phase.

**Officer's Response**  
support welcomed.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>443969 Mr Andy Rogers</td>
<td>Capita Symonds</td>
<td>Paragraph (3.4.5.4)</td>
</tr>
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</table>

**Comment ID:** SASub131  
**Type:** E-Mail

**Summary of Comments**  
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 up to 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.

**Officer's Response**  
support welcomed.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee  
26339  Mrs P Buttery  
Billingborough Parish Council

Agent

Consultation Point  
Policy LSC 1: Housing Allocations in the Local Service Centres

Comment ID: SASub175  
Type: Letter

Summary of Comments  
suggested allocation of Aveland School site, Billingborough for housing and community uses.

Officer's Response  
The school use of this sites ceases in the summer 2012. It will, therefore, be a brownfield site and is considered suitable for redevelopment. A planning application for redevelopment would be considered acceptable in principle under the Core Strategy policy framework. Evidence submitted in support of the representation would suggest that the site might be suitable for allocation. However, consultation and detailed site assessment have not been undertaken. The Highways Authority state that this site may be acceptable for some residential development, subject to a Traffic Assessment. It is thought likely that a change from secondary school to residential use will not result in an increase in traffic movements.
Summary of Comments
Core Strategy identifies 16 LSCs but limits identification of areas suitable for development to a handful. 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. Wants The Old Quarry, Castle Bytham identified 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.

Officer’s Response
No change - site assessment provides robust evidence for site selection. The site is a former quarry and, therefore, located below the level of the surrounding land. It has been identified as being susceptible to surface water flooding. Development has been agreed in principle through employment, medical centre and nursing home approvals. However, the site is considered to be unsuitable for major residential development due to concerns about SSSI, surface water flood risk and capacity of the STW. It should also be noted that the village capacity assessment concluded that Castle Bytham is less able to accommodate planned growth than other villages. The type of facility suggested is not appropriate in this village which is remote from the necessary facilities.
Summary of Comments
Allocate Aveland High School, Billingborough.

Officer's Response
The school use of this sites ceases in the summer 2012. It will, therefore, be a brownfield site and is considered suitable for redevelopment. A planning application for redevelopment would be considered acceptable in principle under the Core Strategy policy framework. Evidence submitted in support of the representation would suggest that the site might be suitable for allocation. However, consultation and detailed site assessment have not been undertaken. The Highways Authority state that this site may be acceptable for some residential development, subject to a Traffic Assessment. It is thought likely that a change from secondary school to residential use will not result in an increase in traffic movements.
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<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

**Summary of Comments**  
Policy LSC1 is too restrictive. Client’s site in Billingborough (R/O 5 Pointon Road - consultation reference BIL06) should be included within allocation.

**Officer’s Response**  
The Highway Authority raised objections to the site because of access concerns.
Summary of Comments
Promoting site SK/LON/10 (Costa Row, Long Bennington). Identification of villages and site locations is NOT justified because it is not the most appropriate strategy when considered against the reasonable alternatives. The promoted site performs better than the allocated site at Long Bennington. Three of the selected sites appear to have been chosen solely because of additional benefits to community BUT policy LSC1 does not require or guarantee delivery of these. The policy should make it clear if additional benefits are required.

Officer's Response
The site assessment process provides robust evidence for site selection. SK/LON/10 was considered (as LB16 & LB17) and rejected because of highway objection and concerns, as well as noise impacts on the site as a result of its proximity to the A1 trunk road. The policy text (para 3.4.4.3) highlights that some of the allocated sites might enable community benefits (other than the provision of affordable housing and open space/play facilities required by other policies) to be provided. The policy identifies sites where it is considered this is the case and allows for the allocation to be of sufficient size to allow for development to benefit the community in addition to the residential development proposed. Changes may need to be made to the policy requiring the provision of the public benefits on the three allocated sites.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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<tbody>
<tr>
<td>26279</td>
<td>Mr Richard Edwards</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
<tr>
<td>401839</td>
<td>Mr David McStravick</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
</tbody>
</table>

#### Comment ID: SASub191
**Type:** E-Mail

<table>
<thead>
<tr>
<th><strong>Summary of Comments</strong></th>
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<tbody>
<tr>
<td>Site at Morton (ADD28) should be allocated. Reassess other sites.</td>
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<table>
<thead>
<tr>
<th><strong>Officer's Response</strong></th>
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<tbody>
<tr>
<td>No change - site assessment provides robust evidence for site selection. The site is not considered suitable for allocation. It is located in Hanthorpe village, which is outside the main settlement and on the wrong side of the A15 to access the village facilities. The Highway Authority has objected to development because of concerns about road widths and will support only infill development. There is no bus stop on this side of the A15.</td>
</tr>
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#### Comment ID: SASub122
**Type:** E-Mail

<table>
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<th><strong>Summary of Comments</strong></th>
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<tbody>
<tr>
<td>support for there being no allocations in Ancaster</td>
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<tr>
<th><strong>Officer's Response</strong></th>
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<tbody>
<tr>
<td>support welcomed.</td>
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Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>606978 Mr Robert Jenkinson</td>
<td>Escritt Barrell Golding</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
</tbody>
</table>

Comment ID: SASub120
Type: Letter

Summary of Comments
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.

Officer’s Response
No change - site assessment provides robust evidence for site selection. This is a steeply sloping site which occupies a prominent position on the edge of the settlement overlooking the valley towards Grantham. Development here would have a significant impact on landscape character (high) of the open countryside. The Highway Authority has objected to development on this site because of visibility issues and the lack of suitable access points. The site also acts as a separation between the village and Grantham. Development of this site would effectively join Great Gonerby to Grantham, which would be contrary to Core Strategy policy SP2.
Summary of Comments
Wants changes to ensure developments at LSC1a (Barrowby) and LSC1d (Gt Gonerby) do not exceed 2storey and planting on eastern edge of LSC1d because of impact on setting of Belton House. Wants allocation of LSC1b (Colsterworth) deleting (if some allocation needed than site size to be reduced to exclude higher land to north and east of site).

Officer’s Response
No change - site assessment provides robust evidence for site selection. In addition, policy EN1 of the Core Strategy directs that all development proposals must be judged against a number of criteria. These include the settings, patterns of development, historic character of the locale. These should ensure that development respects the character of the settlement.
Site LSC1b: The site is in excess of 1/2km measured in a straight line from Woolsthorpe Manor. However, the recent residential development on the former Colsterworth Industrial Estate lies between the Manor and the site. The topography of the site is such that the site is level at the road frontage with Bridge End Road and the area to the rear of the four properties, and rises towards the south of the site to its junction with Woodlands Drive. In addition, the four properties along Bridge End Road which lie in front of the site are two-storey houses. It appears, therefore, unlikely that any development in this location will be visible from Woolsthorpe Manor. The outbuildings to the Manor are located between the Manor and the site, and their arrangement is such that these shield the Manor from public view. These buildings are former stables/barns and have few openings in them. One door and one small window opening are just visible, but the overall appearance is of a blank wall. The buildings look towards the Manor rather than the village and/or countryside. Core Strategy policy EN1 provides criteria against which any development proposals will be judged. These include the impact of the development on the existing landscape and built and historic environment. The allocation provides for a development of 40 dwellings, and the site size is
1.86ha. This should enable development to reflect the character of the existing built environment.

**Consultee**
606978  Mr Robert Jenkinson

**Agent**
26002  Escritt Barrell Golding  
Escritt Barrell Golding

**Consultation Point**
Policy LSC 1: Housing Allocations in the Local Service Centres

**Comment ID:** SASub119  
**Type:** Letter

**Summary of Comments**
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.

**Officer's Response**
No change - the site assessment provides robust evidence for site selection. GGON02 has no suitable access points. A small part of the site, to be accessed via adjacent land, was considered but was rejected due to highway concerns. ADD16 is located outside the village, in open countryside. The Highway Authority will not allow access from the B1174, therefore access constraints and poor relationship to the built up area and services make it unsuitable for development.
## Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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<tbody>
<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>

**Summary of Comments**
Should be allocations in Ancaster. Clients site (Ant House Farm) should be allocated for either residential or employment use.

**Officer's Response**
No change - site assessment provides robust evidence for site selection. The site was not considered suitable for allocation because of Highway Authority objections. The Highway Authority object to residential development because of a lack of a pedestrian footway, and the need for pedestrians to cross the busy A153. The Highway Authority would accept an employment use in this location, provided that the existing access to the LCC Highways Depot could be utilised.

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<th>Consultee</th>
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<tr>
<td>405422 Mr P Eaton</td>
<td>26011 Mr Mike Sibthorp</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
</tbody>
</table>

**Summary of Comments**

**Officer's Response**
No change - site assessment provides robust evidence for site selection. The Highway Authority has objected to development in this location. The site is not considered suitable for development. It is a large site, in open countryside, which would be prominent in the landscape. There is no highway access and the site is poorly related to the existing settlement.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<th>Consultee</th>
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<tr>
<td>372869</td>
<td>372868</td>
<td>Policy LSC 1: Housing Allocations in the Local Service Centres</td>
</tr>
<tr>
<td>Mr and Mrs Geoff Hix</td>
<td>Robert Doughty RDC</td>
<td></td>
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</table>

**Comment ID:** SASub137  
**Type:** E-Mail

**Summary of Comments**  
Sites CAS06, CAS07 and CAS08 should be included as housing allocations in Policy LSC1.

**Officer's Response**  
No change - site assessment provides robust evidence for site selection. These three sites are located outside the confines of the main village, away from the main facilities, and where development would impact on the surrounding area. Because of the number of completions and commitments, only a small amount of additional housing is required to meet the Spatial Strategy and Housing Policy (SP1 and H1) of the Core Strategy. An assessment was made of the capacity of each village to absorb new development. This showed that other villages are more suitable for additional development than Castle Bytham and, thus, no allocations have been made.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

**Consultee**

590493  Mr Daniel Hewett  
The Crown Estate

**Agent**

150520  Mr Daniel Hewett  
Carter Jonas Llp

**Consultation Point**

LSC1 a

**Comment ID:** SASub10  
**Type:** Web

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**Summary of Comments**

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'.

**Officer's Response**

no change - site assessment provides robust evidence for site selection. The village capacity assessment found that most primary schools were at capacity. However, many had scope to expand and could accommodate additional pupils. This is the case at Barrowby. There are a few local facilities at this end of the village, although the majority are located in the village centre. The site is, however, located close to the bus stop which provides regular access both to Grantham and the village centre via the Centre Bus Route 6 (hourly services).
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<th>consultee</th>
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<tbody>
<tr>
<td>497567</td>
<td>Mr Andrew Russell-Wilks</td>
<td>LSC1b</td>
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<tr>
<td>Ancer Spa Midlands Ltd</td>
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</table>

**Comment ID:** SASub133  
**Type:** E-Mail

**Summary of Comments**
Support for allocation of site. Suggestion that site should not be brought forward until 2016-21 is arbitrary. No impediments to site and it is suggested that it should be brought forward during first 5year period. Measures should be put in place to rectify deficiency in 5year housing land supply.

**Officer's Response**
Support welcomed. The phasing of development allows for the maintenance of a continuous 5 year supply of housing land across the plan period. Because of housing commitments in the LSCs it is considered necessary to restrict development and to ensure that additional sites do not come forward till the later phases of the plan period. This is in accordance with para 5.1.6 of the adopted Core Strategy.

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<tr>
<td>26279</td>
<td>Mr Richard Edwards</td>
<td>LSC1b</td>
</tr>
<tr>
<td>Larkfleet Group</td>
<td></td>
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</tr>
</tbody>
</table>

**Comment ID:** SASub123  
**Type:** E-Mail

**Summary of Comments**
Supports policy. Supports inclusion LSC1b. Want site brought forward earlier [in first 5year phase].

**Officer's Response**
Support welcomed. The phasing of development allows for the maintenance of a continuous 5 year supply of housing land across the plan period. Because of housing commitments in the LSCs it is considered necessary to restrict development and to ensure that additional sites do not come forward till the later phases of the plan period. This is in accordance with para 5.1.6 of the adopted Core Strategy.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee
590493  Mr Daniel Hewett
The Crown Estate

Agent
150520  Mr Daniel Hewett
Carter Jonas Llp

Consultation Point
LSC1b

Comment ID: SASub11
Type: Web

Summary of Comments
Since 2006 there has been a large amount of residential development in Colsterworth and there is extant planning permission for further 64 homes. Parish Council do not support more development, and various constraints exist. WCS identified high risk of fluvial flooding affecting this site. Selection is not founded on 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'.

Officer's Response
WCS identifies that 4% of the site might be at risk of surface water flooding (table 5.2 of Final WCS). Appendix E of the Study concludes that various potential SuDS can be employed on site to attenuate surface water run-off. Allocated site area is large enough to accommodate such measures within site area. Colsterworth considered by village capacity assessment to be a suitable village for some additional development later in plan period. Allocation also brings potential for additional village shopping which is considered necessary by the Parish Council. It is noted that the Parish Council has not objected to the allocation in the DPD.
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<tr>
<th>Consultee</th>
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<tbody>
<tr>
<td>604904</td>
<td>Mr Richard Oatridge</td>
<td>LSC1c</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub41  
**Type:** Letter

**Summary of Comments**  
I believe the DPD is sound. [comments specifically relate to Tanners Lane site - not allocated]

**Officer's Response**  
noted. Sites on Tanners Lane (namely CORB04, 03, 02 & 01) were considered but not selected for allocation for the following reasons:  
CORB04 - part of site in flood zone, WCS identifies high risk of surface water flooding. Highway Authority concerns about visibility and access.  
CORB03 - whole site within flood zone, Highway Authority concerns about access and drainage, requiring major improvements.  
CORB02 - Highway Authority concerns - major improvements, including drainage, required.  
CORB01 - Highway Authority objection - no suitable access.
**Summary of Comments**
This site is remote from local services and facilities, and development would encroach into the open countryside and have significant impacts on the landscape character of the countryside. 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'.

**Officer's Response**
Site is adjacent to secondary school, new medical centre, village hall and playing field. Surface water issues affect 4% of this site area, and can be addressed through appropriate layout and SuDS provision.
Summary of Comments
delete allocation and substitute site CORB10.

Officer's Response
It is not proposed to change the allocation. The site assessment process provides robust evidence for site selection. The Highway Authority expressed concerns about development of the site: carriageway improvements and footway links would be required. There are also concerns about the provision of an access point. The proposed allocation site would also provide some public benefits as a result of development.

Summary of Comments
Great Gonerby Parish Council wish to make the following comment: Easthorpe Road development my not be sufficiently adequate for Great Gonerby.

Officer's Response
noted. The site assessment concluded that the allocation site and one further site, which has planning permission for affordable housing, were the only suitable sites in the village. Proposed policy SAPH1 of the DPD will allow for small infil developments.
**Summary of Comments**

Site is unsuitable and should be deleted. Substitute client's site at The Drift (HARL03).

**Officer's Response**

The site suggested was not considered suitable for allocation because of Highway Authority concerns and the site's poor relationship with the village centre. The site is separated from the main settlement, where the main services are located, by a busy main road. Development of the site would encroach on open countryside and have a significant impact on the landscape character (high) of the area.
Summary of Comments
Not agree with assessment of suitability of site. Client's own site (ADD17 - land to the west of Swine Hill) should be allocated.

Officer's Response
The site is within Entry on Register of Parks and Gardens of Special Historic Interest. However, despite this designation the allocated site is not considered to have a detrimental impact on the setting of the Harlaxton Manor and could also provide for car parking for the school and doctors surgery. Site ADD17 was assessed. This site was not selected for allocation because there are Highway Authority concerns regarding development of such a large site via an access that is constrained by width, visibility and proximity to the school, or via an access to the south of the site which would extend the built form of the village into the countryside.
Summary of Comments

Consultee: Mr Paul Procter
Agent: Consultee
Consultation Point: LSC1e

Comment ID: SASub60
Type: Web

Summary of Comments

Objects to allocation of site in Harlaxton. Suggests smaller numbers of houses in a wider spectrum of villages is the most sensible proposition, rather than concentrating on just 6 villages which denies other villages from modest development. Reference to affordable housing is vague and carries no conviction.

Officer's Response

Affordable housing requirement accords with Core Strategy policy H3, and is a requirement on all development sites.

Summary of Comments

Consultee: Mr Daniel Hewett
Agent: 150520 Mr Daniel Hewett
Consultation Point: LSC1e

Comment ID: SASub13
Type: Web

Summary of Comments

Since 2006 there has been a large amount of residential development in Harlaxton and there is extant planning permission for further 9 homes. Evidence Report confirms school is at capacity and there are major concerns about traffic impact from development on Swine Hill. Development of site will have significant impact on landscape and on the visual character of village. 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'.

Officer's Response

It is not proposed to change the allocation - site assessment provides robust evidence for site selection. Harlaxton is considered by the village capacity assessment to be a suitable village for some additional development. The school is stated to be at capacity but has room for expansion. Highway concerns can be addressed by the provision of car parking within the site for the school and medical centre, and also wider public benefits of footpath/cycle way links.
Summary of Comments
Object to site on impact grounds (it lies within Harlaxton Manor Grade II* registered park and garden). There are other sites in Harlaxton which may be better, although the need for development is questioned.

Officer's Response
Site assessment in Appendix 5 of SA report amended to show site within Entry on Register of Parks and Gardens of Special Historic Interest. However, despite this designation, the allocated site is not considered to have a detrimental impact on either the Historic Park and Garden, or on the setting of the Harlaxton Manor. The development is small scale and, as it could also provide for car parking for the school and doctors surgery, will provide considerable public benefit. The proposal is supported by the Parish Council who is keen to see parking issues in this location addressed.
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<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>607510</td>
<td>Mr &amp; Mrs Brenda &amp; Colin Braziel</td>
<td></td>
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</tbody>
</table>

Comment ID: SASub192  
Type: Letter

**Summary of Comments**  
no support from site from parish council. Allocation should be deleted.

**Officer's Response**  
The site assessment provides robust evidence for site selection. Responses from the Parish Councils are only part of the assessment process. Long Bennington is considered by village capacity assessment to be a suitable village for some additional development: the school has room, albeit limited, for expansion and the medical centre confirms that there is a small amount of capacity available. The WCS indicates that, although there are issues to be resolved, these do not affect this site. The Parish Council has indicated that it does not support the site, but that it would be ranked as No 1 of the sites considered suitable for allocation in this village.

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<th>Consultee</th>
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<tr>
<td>607531</td>
<td>Mr Niall Shannon</td>
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</tbody>
</table>

Comment ID: SASub189  
Type: E-Mail

**Summary of Comments**  
Delete allocation.

**Officer's Response**  
It is not proposed to change the allocation. The WCS indicates that there are issues to be resolved with the village. However, Anglian Water's response to a current planning application indicates that the constraint does not affect this site.
Summary of Comments
Since 2006 there has been a large amount of residential development in Long Bennington and there is extant planning permission for further 60 homes. Evidence Report states both medical centre and school are at capacity. There are flooding issues in 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'.

Officer's Response
Long Bennington is considered by village capacity assessment to be a suitable village for some additional development. The school is stated to be at capacity but there is room, albeit limited, for expansion. The medical centre confirms that there is a small amount of capacity available. The WCS indicates that there are issues to be resolved. However, the response to a current planning application indicates that the constraint does not affect this site. There is, however, a high level of need for affordable housing in Long Bennington. Land and house values in this village are high and the only realistic means of delivering much needed affordable housing is through the allocation of a mixed market and affordable housing scheme. Therefore, despite the high levels of completions and commitments the Council determined that it was appropriate to make a small allocation in this village as the means of delivering affordable housing.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<th>Consultee</th>
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<tr>
<td>607550 Mr Walter Hughes</td>
<td></td>
<td>LSC1f</td>
</tr>
</tbody>
</table>

Comment ID: SASub178
Type: Letter

Summary of Comments
Site not supported by Parish Council. Wants site deleted and LB12 substituted if development needed.

Officer's Response
It is not proposed to change the allocation. The WCS indicates that there are issues to be resolved. However, the response to a current planning application appears to indicate that this constraint does not affect the allocated site. Consultation site LB12 was not considered suitable for allocation because development would extend into the open countryside and it was considered that there were other more preferable sites available which were better related to the village.
Summary of Comments
LSC1f not the preferred choice of Parish Council and site LB18 (west of Old Great North Road) should be substituted.

Officer's Response
It is not proposed to change the allocation. The WCS indicates that there are issues to be resolved in the village. However, Anglian Water's response to a current planning application indicates that this constraint does not affect the allocated site. The Parish Council has indicated that it does not support the site, but that it would be ranked as No 1 of the sites considered suitable for allocation in this village. Site LB18 was not selected for allocation because of Highway Authority objections. The Highway Authority has concerns with the point of access off Main Road, which would create a crossroad with Westborough Lane (a major route into the village).
Summary of Comments
Parish Council response to site LB02 at workshop did not reflect full Parish Council opinion. The ranking "1" is not objected to, but this site is not supported given concerns relating 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. PC also raise concerns that a site indicated for 30 potential dwellings is now subject to an application for 35.

Officer's Response
Concerns noted. Site assessment provides robust evidence for site selection. It should be noted that the policy provides an "indicative" capacity only for each site. Although the WCS indicates that there are issues to be resolved, the response to a current planning application indicates that the constraints does not affect this site. The Long Bennington Parish Plan contains a map which identifies the site as "Amenity Use (Sports)", but includes no indication of how this is to be achieved. It is noted that the Parish Plan was published in 2005, the site is currently in agricultural use and is being promoted by the landowner for housing. It would appear, therefore, that it is not available for the use indicated in the Parish Plan. Policy SAP10 of the DPD requires that contributions are made for the provision of play space/equipment/open space as appropriate to the scale of development.
Summary of Comments
The phasing for this site should be amended to read 2016-2021 so that the sewerage issues can be resolved before development commences.

Officer’s Response
It is not proposed to change the phasing. The WCS indicates that there are issues to be resolved with Long Bennington. However, Anglian Water’s response to a current planning application indicates that this constraint does not affect the allocated site.

Summary of Comments
Support for allocation of site. (on behalf of developer)

Officer’s Response
support welcomed.
**Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response**

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<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
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<tbody>
<tr>
<td>26231</td>
<td>Mr D Bainbridge Bidwells</td>
<td>Housing Development and Managing Delivery (3.5)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub114  
**Type:** E-Mail

**Summary of Comments**
Wants table included showing proposed housing allocations for each settlement in SAP DPD. States absence means that effective delivery cannot be readily viewed and considered.

**Officer's Response**
It is not considered necessary as each policy includes details of sites, capacities, and phasing.

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<th>Consultee</th>
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<tbody>
<tr>
<td>487941</td>
<td>Mr M Newton Boyer Planning</td>
<td>Paragraph (3.5.1)</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub198  
**Type:** E-Mail

**Summary of Comments**
Phasing of allocations arbitrary and not justified, would be inappropriate to restrict grant of O/L planning permission to "12 month" rule in view of time taken to conclude S106 agreements and grant reserve matters permissions - restrict delivery of housing within the identified phases.

**Officer's Response**
The phasing of allocations is designed to enable a continuous supply of housing land throughout the District over the whole of the plan period. It takes into account information about the availability of sites, the provision of infrastructure, and the need to phase delivery over the whole plan period. Where further information becomes available, it may be necessary to revise this. However, the phasing of allocations allows development to make provision for continuous 5 year land supply, in accordance with the provisions of the Core Strategy Policy H1, and as explained in paras 5.1.6 and 5.1.7 of the DPD.

09/03/2012
Summary of Comments

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.

Officer's Response

Support welcomed.

Summary of Comments

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.

Officer's Response

Support welcomed. It should be noted that representation SASub118 concerns the provision of a site in Baston for allocation.
## Summary of Comments

**Consultee** 372928  Mr Tom Gilbert-Wooldridge

**Agent** English Heritage

**Consultation Point** Policy SAP H1: Other Housing Development

**Comment ID:** SASub62  
**Type:** Web

**Summary of Comments**

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.

**Officer's Response**

Support noted.

---

## Summary of Comments

**Consultee** 474396  Mr Gordon Smith

**Agent**

**Consultation Point** Retention of Services and Facilities (4.1)

**Comment ID:** SASub149  
**Type:** E-Mail

**Summary of Comments**

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.

**Officer's Response**

Policy is clear that it refers to LSCs. This policy accords with Core Strategy policy SP2.
Summary of Comments
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.

Officer's Response
The text to the policy contains an illustrative list of "community facilities", but it should not be regarded as exhaustive. Vicarages are usually the home of the vicar of the parish, rather than a community facility in the sense envisaged by the policy. Any change of ownership, but not of use as a residence, would not require planning permission.

Summary of Comments
Support the aims of the policy to retain community services and facilities. However, 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. Seeks clarification of which settlements the policy applies to.

Officer's Response
Policy is clear that it refers to LSCs. This policy accords with Core Strategy policy SP2. All applications for development must satisfy the criteria in Core Strategy policy EN1, which include consideration of historic environment (including listed buildings and conservation areas).
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<tbody>
<tr>
<td>474396 Mr Gordon Smith</td>
<td></td>
<td>Policy SAP1: Retention of Community Services and Facilities</td>
</tr>
</tbody>
</table>

**Consultation Point:**
Policy SAP1: Retention of Community Services and Facilities

**Summary of Comments:**
Use of the term "village" would exclude main towns.

**Officer's Response:**
Policy is clear that it refers to LSCs. This policy accords with Core Strategy policy SP2.

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<tr>
<td>475706 Miss Clare Sterling</td>
<td>Lincolnshire Wildlife Trust</td>
<td>Policy SAP2: Rural Exception Affordable Housing</td>
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</table>

**Consultation Point:**
Policy SAP2: Rural Exception Affordable Housing

**Summary of Comments:**
Support for policy criteria.

**Officer's Response:**
support welcomed.
**Summary of Comments**
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.

**Officer's Response**
support welcomed. Settlement boundaries are not defined, and the phrase "within built-up part of the village" is felt to be adequate, however additional confirmation of this could be included in the policy.

**Summary of Comments**
Support for policy criteria.

**Officer's Response**
support welcomed.
**Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response**

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<tr>
<th>Consultee</th>
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<th>Consultation Point</th>
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<tr>
<td>490730</td>
<td>Mr Alan Hubbard</td>
<td>Policy SAP3: Supporting Local Business in Local Service Centres</td>
</tr>
</tbody>
</table>

The National Trust

**Comment ID:** SASub216  
**Type:** E-Mail

**Summary of Comments**
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.

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<tbody>
<tr>
<td>372928</td>
<td>Mr Tom Gilbert-Wooldridge</td>
<td>Policy SAP3: Supporting Local Business in Local Service Centres</td>
</tr>
</tbody>
</table>

English Heritage

**Comment ID:** SASub65  
**Type:** Web

**Summary of Comments**
We welcome reference to the historic environment and character in the policy wording.

**Officer’s Response**
comments noted.

**Officer’s Response**
support welcomed.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<th>Consultee</th>
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<tr>
<td>475706 Miss Clare Sterling</td>
<td>Lincolnshire Wildlife Trust</td>
<td>Policy SAP4: Business Development in the Countryside (Including Rural Diversification Schemes)</td>
</tr>
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</table>

#### Summary of Comments
Supports policy criteria.

#### Officer's Response
Support welcomed.

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<tr>
<td>372928 Mr Tom Gilbert-Wooldridge</td>
<td>English Heritage</td>
<td>Policy SAP4: Business Development in the Countryside (Including Rural Diversification Schemes)</td>
</tr>
</tbody>
</table>

#### Summary of Comments
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.

#### Officer's Response
Support welcomed.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<th>Consultation Point</th>
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<tbody>
<tr>
<td>26102</td>
<td>Mr P R Tame</td>
<td>Policy SAP4: Business Development in the Countryside (Including Rural Diversification Schemes)</td>
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<tr>
<td>National Farmers Union</td>
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**Consultation Point**

**Summary of Comments**

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. Concerned that the final paragraph, about viability and appropriateness to rural setting, is against Government policy as it does not promote development but severely limits it.

**Officer's Response**

no change - it is considered that the criteria allow for economic development in the countryside whilst ensuring environmental and landscape protection.
### Consultee
490730  Mr Alan Hubbard  
The National Trust

#### Summary of Comments
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.

#### Officer’s Response
Comments noted.

### Consultee
475706  Miss Clare Sterling  
Lincolnshire Wildlife Trust

#### Summary of Comments
Existing sites may support protected or important habitats or species. Wish to ensure all sites are subject to an ecological survey at planning application stage. If adverse impacts cannot be mitigated against then planning permission should not be granted.

#### Officer’s Response
Comments noted. All proposals for development must also accord with other policies. Core Strategy policy EN1 requires consideration of environmental, heritage and landscape factors. If there are protected species then other legislation applies.
Summary of Comments
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 from 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.

Officer’s Response
The policy is aimed at safeguarding important local employment sites. The policy does permit non-employment uses, which may allow for some uses listed. However, as town entre uses they would also have to satisfy the retail policy, provided certain strict criteria, particularly the sequential approach, can be met. The policy does not specify what uses are acceptable on existing employment sites. The supporting text to the policy at para 4.4.2 does make reference to uses; however this is in the context of how EXE sites have been identified.
### Summary of Comments
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, are not yet been fully developed (such as ExE B1 or ExE D1), while any of the sites could be redeveloped. Therefore there could be additional impacts on the surrounding environment, including heritage assets (e.g., Burghley Park and St. Leonard’s Priory in the case of ExE S4). The SA 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.

### Officer’s Response
There should be not significant additional environmental impacts resulting from the sites remaining in employment use. Proposals for redevelopment would need to comply with environmental criteria in Core Strategy policy EN1. This policy is site specific: any proposals for extensions to existing development would be subject to Core Strategy policy EN1. It is not considered that any amendment is required.

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<tr>
<td>372928 Mr Tom Gilbert-Wooldridge</td>
<td></td>
<td>Policy SAP5: Locally Important Existing Employment Sites</td>
</tr>
<tr>
<td>474236 Mr N Grace Savills</td>
<td></td>
<td>Policy SAP6: Employment Development at Gonerby Moor</td>
</tr>
</tbody>
</table>

### Summary of Comments
support for SAP6 and wants land identified within policy.

### Officer’s Response
The policy criteria would allow for development in this location. To accord with the Core Strategy, it is not considered appropriate to allocate a specific site.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tbody>
<tr>
<td>606978</td>
<td>Mr Robert Jenkinson</td>
<td>Policy SAP 6: Employment Development at Gonerby Moor</td>
</tr>
<tr>
<td>Agent</td>
<td>Escritt Barrell Golding</td>
<td></td>
</tr>
<tr>
<td>26002</td>
<td>Escritt Barrell Golding</td>
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</table>

**Comment ID:** SASub121  
**Type:** Letter

#### Summary of Comments
Inclusion of area GMOOR02 for future Industrial Development

#### Officer's Response
The policy criteria would allow appropriate employment development in this location. To accord with the Core Strategy, it is not considered appropriate to allocate a specific site.

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<tr>
<td>474396</td>
<td>Mr Gordon Smith</td>
<td>Policy SAP7: Development Within the Defined Town Centres</td>
</tr>
</tbody>
</table>

**Comment ID:** SASub151  
**Type:** E-Mail

#### Summary of Comments
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.

#### Officer's Response
The plan does not allocate any land for retail development: no sites were found suitable for allocation. A review of those sites identified in the Retail Needs Study concluded that none of them were suitable to be identified as Opportunity Areas, for a variety of reasons, including site constraints and present uses. SAP8 Town Centre Opportunity Areas provides the policy basis to determine planning applications for retail development in the town centres, and it is considered that the criteria within the policy are sufficient to allow for the redevelopment of redundant sites in and around the town centres.
**Summary of Comments**

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.

**Summary of Comments**

Policy SAP7 should have the benefit of an appropriate Proposals Map identifying the extent and boundary of the town centre of Bourne.
Summary of Comments
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.

Officer's Response
comments noted. The NLP Retail Study considers the level of need across the whole plan period. This study is considered to be robust and justified.
Summary of Comments
NLP report not correctly interpreted, in respect of the amount of vacant retail space in Stamford. Paragraph to be redrafted to more accurately reflect the findings of the NLP Retail Study.

Officer's Response
The Retail Needs Study projects that 9,400m2 of retail space will be required by 2016, rising to 17,300m2 by 2021. It states that vacant units and commitments could reduce the 2016 projection. The study has, however, made assumptions concerning reallocation of capacity to Grantham and Bourne, and it is clear that the amount of vacant retail space in Stamford is not sufficient to justify the statement at para 4.6.4. It is considered that this should read "..2016, some of which ...". The NLP study suggests sites which could be considered to meet remaining capacity. These comprised St Johns Lane/Bath Row (adjacent to car parking, but constraints include multiple ownership and the need to maintain existing pedestrian links), the Bus Station (in use and an important facility which it is essential to retain), North St Car Park (an important local facility) and North St Chapel Yard (adjacent to the car park, small site with extant planning permission for residential development).

A review of all those sites identified in the Retail Needs Study concluded that it is not appropriate to identify any of them as Opportunity Areas for a variety of reasons. Those relating the Stamford sites are detailed above. It is considered that the criteria within the policy are sufficient to allow for the redevelopment of redundant sites in and around the town centres. The policy also provides for the sequential and impact assessments required when determining proposals.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee
428033 Sainsburys Supermarkets Ltd
Indigo Planning Limited
Sainsburys Supermarkets Ltd

Comment ID: SASub161
Type: E-Mail

Summary of Comments
Suggest that Policy SAP8 is amended to support further retail development at existing out of centre locations, ahead of other locations, subject to those circumstances where the sequential test and impact tests are met.

Officer’s Response
The Council is supportive of proposals which provide for improved economic development. It is considered that the criteria within the policy are sufficient to allow for the redevelopment of redundant sites in and around the town centres, and at edge of centre locations. The policy is explicit that a sequential approach to site selection, as advocated in PPS4, should be followed when determining planning applications.
### Summary of Comments
The town centre boundary should be extended to include the Co-op Supermarket site. The unused part of that site (adjacent to Godseys Lane) should be identified as an Opportunity Area.

### Officer's Response
A review of those sites identified in the Retail Needs Study concluded that none of them were suitable to be identified as Opportunity Areas. This was for a variety of reasons, including site constraints and present uses. However, this does not include the site suggested which, at this stage, has not been fully assessed. It is considered that the criteria within the policy are sufficient to allow for the redevelopment of redundant sites in and around the town centres.

### Summary of Comments
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.

### Officer's Response
A review of those sites identified in the Retail Needs Study concluded that it is not appropriate to identify sites as Opportunity Areas. It is considered that the criteria within the policy are sufficient to allow for the redevelopment of redundant sites in and around the town centres.
Summary of Comments
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.

Officer's Response
support welcomed and comments noted. All proposals will need to satisfy the criteria in Core Strategy policy EN1 which include consideration of heritage assets, as referenced in the policy.

Summary of Comments
Wants sensitive, piecemeal development of Core Area.

Officer's Response
It is considered that the policy criteria will ensure the sensitive development of the Bourne Core Area. A separate SPD is available which provides detailed guidance about the redevelopment of this area. Phase I of the Core Area has recently been granted planning permission. This phase is in accordance with the comprehensive approach required by the policy, which recognises that economics and land valuation and costs will affect the ability to deliver the whole scheme at the same time.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>517670</td>
<td>Natural England</td>
<td>Policy SAP10: Open Space Provision</td>
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<td>Natural England</td>
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**Comment ID:** SASub205  
**Type:** E-Mail

**Summary of Comments**
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.

**Officer's Response**
comments noted.

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<tr>
<td>474396</td>
<td>Mr Gordon Smith</td>
<td>Policy SAP10: Open Space Provision</td>
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**Comment ID:** SASub153  
**Type:** E-Mail

**Summary of Comments**
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.

**Officer's Response**
The policy is concerned with the provision of open spaces. Sports Halls, Swimming Pools, Community Halls etc are indoor recreational facilities and, therefore, outside the scope of this policy. The policy standard is derived from the 2009 Open Spaces Survey.
### Summary of Comments

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.

### Officer's Response

This Council does not support the re-development of allotment land for residential (or other purposes) unless it can be properly demonstrated that these are surplus to requirements and not required in the longer term. Excess provision over recommended standard does not mean there is a surplus. Allotments are well used, and with population growth the ratio of provision to population will narrow.

---

### Summary of Comments

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.

### Officer's Response

comments noted. A detailed GI study has only been prepared for Grantham. the District-wide Study of Open Space, Sport and Recreation in South Kesteven and the Green Infrastructure Strategy [both 2009] have been used as background evidence in the preparation of the DPD.
### Consultee: Miss Clare Sterling  
Lincolnshire Wildlife Trust  

**Summary of Comments**  
Supports policy criteria. Recommends 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).

**Officer's Response**  
Support welcomed. ANGSt was used to inform the policy standards (derived from the Open Space Study of 2009).

### Consultee: Mr Tom Gilbert-Wooldridge  
English Heritage  

**Summary of Comments**  
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).

**Officer's Response**  
The requirement to protect the historic environment is included in EN1 of the Core Strategy: to repeat it is not considered necessary. However, inclusion of an additional criteria protecting habitats and species could be expanded to include "historic assets" for consistency. It should be noted that this criterion (bullet 4) of the policy should be "and" not "or".
## Summary of Comments

### Consultee: Mr M Newton

**Consultation Point:** Policy SAP10: Open Space Provision

**Comment ID:** SASub195  
**Type:** E-Mail

**Summary of Comments**

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.

**Officer’s Response**

The text is clear that the standards in the policy have been derived from the Study of Open Space, Sport and Recreation published in 2009.

---

## Summary of Comments

### Consultee: Mr Gordon Smith

**Consultation Point:** Paragraph (5.2.3)

**Comment ID:** SASub154  
**Type:** E-Mail

**Summary of Comments**

No reference is made to the future of the area’s largest single space user, the Deepings Business and Enterprise collage and its future development. This may well be a criticism of the College itself or the County Council.

**Officer’s Response**

Comments noted. The Deepings School provides secondary education (as stated in the paragraph). Since 2003 it has also been designated as a Business and Enterprise College. The Council has not been made aware, by either the College or LCC, of any proposals for future expansion. Lack of any specific reference to the college does not prohibit any future proposals being considered through the policy framework.
### Summary of Comments

**Ms Jane Bateman**

I would question that there are no capacity issues with GP practices in Stamford given the number of houses currently being built.

**Mr Gordon Smith**

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.

**Officer's Response**

Concerns noted. Information from GP practices in Stamford states that they have capacity for additional patients, or scope to expand their practice to accommodate new patients.

Information from healthcare providers indicates that additional population can be accommodated. This may be by means of developer contributions/S106 etc. A detailed S106 SPD is being prepared by the Council which encompasses health care improvements, or these will be included in the future CIL.
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<tr>
<td>605314</td>
<td>Annette Hewitson</td>
<td>Paragraph (5.2.8)</td>
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**Summary of Comments**

Text should be updated to reflect the findings of the detailed WCS (November 2011). Wording suggested.

**Officer's Response**

Text updated to reflect the findings of the detailed WCS (November 2011). (see Schedule of Proposed Changes WCS1-WCS16).

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<td>605314</td>
<td>Annette Hewitson</td>
<td>Paragraph (5.2.9)</td>
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</table>

**Summary of Comments**

Text should be updated to reflect the findings of the WCS (November 2011). Suggests wording.

**Officer's Response**

Text amended to reflect the recommendations of the WCS (November 2011). (see Schedule of Proposed Changes WCS1-WCS16).
Summary of Comments
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.

Officer's Response
Comments noted. It should be stressed, however, that new footpaths and cycleways contribute towards the safety of pedestrians and cyclists by removing both from the road.

Summary of Comments
Want further details of critical transport infrastructure in schedule.

Officer's Response
We have not been made aware of any critical transport infrastructure requirements by either the LCC or Highways Agency. There are only improvements local to some development sites. Transport Assessments may identify offsite improvements.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>372869</td>
<td>372868</td>
<td>Proposals Map Table 1</td>
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<tr>
<td>Mr and Mrs Geoff Hix</td>
<td>Robert Doughty RDC</td>
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Comment ID: SASub138
Type: E-Mail

Summary of Comments
Sites CAS06, CAS07 and CAS08 should be included as housing allocations on the Castle Bytham Inset Map.

Officer's Response
The sites are not considered appropriate for allocation because they are located outside the main village where development would impact on the area.
Summary of Comments
Wants land off South Road, Bourne, identified for roadside services and other uses, referred to in 3.2.9 and shown on Proposals Map.

Officer's Response
This greenfield site lies to the south of Bourne immediately adjacent to, and opposite, existing residential development. It has an existing access point off the roundabout and has previously been considered suitable for roadside uses, with historic planning consent which included a public house/restaurant. The DPD includes an aspiration to improve the road connection between Cherryholt Road and South Road, and allocates land to the east of the site for employment use (B1b). An application on this site alludes to the retention of an access through the site which could provide the necessary highway connection. This representation wants the site allocated for roadside services and other uses to reflect its history and to allow for the creation of a through road to access site B1b (allocated for employment uses). The site has not been subjected to public consultation or the full site assessment process, and has not, therefore, been considered for allocation. However, there is some logic to the allocation of the site to achieve the desired through-access to B1b. The Highway Authority has stated that it supports the proposed use.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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**Comment ID:** SASub225  
**Type:** Letter

#### Summary of Comments
Proposes inclusion of GGON02. States that 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.

#### Officer's Response
This site was not considered suitable for allocation because it has no suitable access points, and although a small part, to be accessed via adjacent land, was considered for development, it was rejected due to highway concerns.

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**Comment ID:** SASub54  
**Type:** Web

#### Summary of Comments
STM1b - not showing current buildings. STM2b - oppose development near river & Burghley House. STM1 - question need to build on greenfield site. STM2 - oppose building on greenfield site. STM3 - question need to build on greenfield site, size of development too great, and prominent location.

#### Officer's Response
It is not proposed to change the allocation: site assessment provides robust evidence for site selection.
No one single piece of evidence has been used to determine which site to allocate. All sites have been assessed using the same criteria. The Council decided that, on balance, the proposed allocation would have less of an impact upon highway capacity issues; landscape and setting; ecology; flood risk and was of an appropriate scale to meet the identified housing and employment needs of the town.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<td>26121 Mr D Fabris</td>
<td>372868 Robert Doughty</td>
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<tr>
<td>Mouchel Business Services Limited</td>
<td>RDC</td>
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Comment ID: SASub136
Type: E-Mail

Summary of Comments
The Aveland High School site, identified on the plan that accompanies the Representation, should be allocated for housing on the Billingborough Inset Map.

Officer's Response
The school use of this sites ceases in the summer 2012. It will, therefore, be a brownfield site and is considered suitable for redevelopment. A planning application for redevelopment would be considered acceptable in principle under the Core Strategy policy framework. Evidence submitted in support of the representation would suggest that the site might be suitable for allocation. However, consultation and detailed site assessment have not been undertaken.

The Highways Authority state that this site may be acceptable for some residential development, subject to a Traffic Assessment. It is thought likely that a change from secondary school to residential use will not result in an increase in traffic movements.
### Summary of Comments

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. Suggest consider retention of this site. Consider also smaller extension site based upon E2.3.

### Officer's Response

Site STAM14 is a greenfield site. The only brownfield land on the east of Stamford is the former Mirlees Blackstone site, which lies to the west of STAM14. There have been numerous applications on the Mirlees Blackstone site, and it has extant planning permission (S11/0547 approved 21/4/2011) for the erection of business units. STAM14 formed part of Local Plan employment allocation E2.3. However, although allocated since 1995, none of it was developed. The site was considered by the NLP employment study, which identified other sites in Stamford as being more suitable and attractive to the market. It is not, therefore, proposed to carry this allocation forward. Other brownfield land to the east of Stamford lies south of Uffington Road and has been proposed for allocation in the DPD as site STM1c and STM2b. Land south of STAM14 is in employment use and has been identified as a Locally Important Existing Employment Site in policy SAP5 of the submission DPD.
### Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>26386</td>
<td>Miss Joyce Stevenson</td>
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**Consultation Point:** Proposals Map Table 2

**Comment ID:** SASub134

**Type:** Letter

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**Summary of Comments**

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".

**Officer's Response**

Agreed; map title should be Thurlby and Northorpe.

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<tr>
<td>605877</td>
<td>Mr J Wherry</td>
<td>Proposals Map Table 2</td>
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**Consultation Point:** Proposals Map Table 2

**Comment ID:** SASub99

**Type:** Web

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**Summary of Comments**

Part of allocation H3.15 in client’s ownership and not part of Elsea Park development. Wants to retain that part of H3.15 as a housing allocation.

**Officer's Response**

This small parcel of land (app 0.38ha) does not form part of that approved as part of the Elsea Park development. It is considered that Policy SAP H1, which allows for the development of "suitable brownfield and small infill sites" within Bourne, would allow residential development on this site, subject to any proposed development meeting the policy criteria in other respects.
**Consultee**
487941  Mr M Newton
Boyer Planning

**Consultation Point**
Water Cycle Study

**Summary of Comments**
Not justified: because unnecessarily restrictive in terms of delivery. Phasing influenced by infrastructure constraints (esp wastewater). However, findings of WCS not consistent with AW pre-development report which demonstrates capacity exists to accommodate STM3. Not effective: because not sufficiently flexible, which undermines soundness. No consistent with National Policy: phasing works against principles in paras 10 & 52 of PPS3 for flexible, responsive land supply, managed efficiently and effectively. Para 14 of draft NPPF requires a flexible approach in development plans. Policy has not mechanism to bring forward development where there is a shortfall in land supply.

**Officer's Response**
Evidence from AWS relating to the ability to service this site is welcomed. However, phasing of allocations is not just about infrastructure capacity. It is also about ensuring a continuous supply of deliverable housing land throughout the plan period.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<tr>
<td>603266</td>
<td>Mrs Jane Evans</td>
<td>Water Cycle Study</td>
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<tr>
<td>Long Bennington Parish Council</td>
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**Comment ID:** SASub243  
**Type:** E-Mail

**Summary of Comments**  
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.

**Officer's Response**  
The WCS has identified that there is a potential risk of sewer flooding in Long Bennington. This affects the village in general. However, in responding to the current planning application on the allocated site LSC1f Anglian Water has confirmed that this constraint does not affect the allocated site as it will drain direct to the WwTW rather than use the restricted sewer system within the village. The constraint is relevant, however, to the village as a whole and will affect further development proposals elsewhere in the village.
**Consultee**
407064  Mr Philip Williams  
Ryhall Road Residents Association

**Comment ID:** SASub245  
**Type:** E-Mail

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**Summary of Comments**
Agree with the thrust of the reports recommendations limiting growth in Stamford until sewerage solution is in place. 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.

---

**Officer's Response**
Projected cost of £1m applies to all developments together as report suggests a strategic solution required. Any such improvement would be funded by the development or service provider.
Summary of Comments
The findings of Water Cycle Study (WCS) are broadly supported. 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 up to
35 dwellings. The findings of that enquiry can be summarised as follows: â€¢
Public foul and surface water sewers within close proximity of the development
site boundary â€¢ Long Bennington WwTW has capacity for foul drainage from
proposed development â€¢ The sewerage system has capacity for gravity flows
from proposed development site. â€¢ There have been no 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. [report attached]
## Summary of Comments

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.

## Officer's Response

support welcomed.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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<td>260968  Mr Tim Lee</td>
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<td>Water Cycle Study</td>
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Stamford Chamber of Trade and Commerce

**Comment ID:** SASub247  
**Type:** E-Mail

### Summary of Comments

WYG makes clear that there is no significant flood risk on the "East" site. WYG are more familiar with the detail of our site than either Entec or AMEC, and are supported by the EA. They 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 assert that sewerage is a strategic problem in Stamford and will affect all sites equally. This is not correct. This problem severely affects sites West of Stamford but not the "East" proposals. "East" developments can pump directly into the Stamford terminal pumping station near Hudds Mill, which forwards flows to the Stamford WwTW near Barnack. This system is operating at only 65% capacity. It is questionable if the STAM01 and STAM02 sites are deliverable. 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.

### Officer's Response

The WCS does identify (on a map) the areas at risk of flooding. This is incorporated with the SFRA in which Flood Zone 3 covers a large part of the centre of the site referred to as STAM14. The sewerage constraints identified in the WCS have been concluded out of evidence and information provided by AWS and the IDBs, and provides a starting point from which more detailed assessment of constraints can be made. This work confirms that the allocated site can be serviced without need for improvements to the sewer network.
Summary of Comments
Although WCS indicates 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. Not justified to conclude that works necessary or that these will impact on the phasing and delivery of sites. WCS methodologies cannot be relied on to inform or justify delivery constraints and phasing requirements at particular sites. Specific concern: timing of development of STM1, STM2 and STM3. 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. Conclusions not consistent with appraisals completed by Anglian Water specifically for the Empingham Road Site (see Appendix to this representation) which concludes: The sewerage system, at present, has available capacity for gravity flows from the proposed development site. 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. Not dispute the

Officer's Response
The phasing of development also allows for the maintenance of a continuous 5 year supply of housing land across the plan period. Adoption of the DPD will help increase 5 year supply through the provision of a range of allocated sites across the District. This is in accordance with the provisions of the Core Strategy, especially para 5.1.6, to maintain a continuous 5 year supply of deliverable land. Developer Inquiry prepared by AWS confirms that the allocated site STM3 can be accommodated with the existing water infrastructure without upgrade or reinforcing.
recommendation that a UPM model is undertaken. However, we consider this 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. Measures can be taken in parallel with the development process and this should be made clear in the text of paragraph 3.1.14.

**Consultee**  
407029  Mr Robert Conboy  
South West Approaches Group

**Agent**  

**Consultation Point**  
Water Cycle Study

**Consultation ID:** SASub244  
**Type:** E-Mail

**Summary of Comments**  
Reaffirm objections to the allocation (STAM01 and STAM02) and also confirm that our group wishes to be represented/attend at the Examination. 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. SKDC should withdraw the allocation on STAM01 and STAM02 and correctly assess allocation of other brown field sites to the east of Stamford.

**Officer's Response**  
The site referred to, to the east of town, is assumed to be STAM14 of the Site Consultations. The WCS does, indeed, confirm that much of this site is within Flood Zone 3 and therefore a high risk for flooding. The conclusions of the WCS were used to inform the site selection process. The constraints of the full sewage network relate to any development in Stamford which would go through the Hudd's Mill pumping station, not specifically the STM3 site.
Summary of Comments
Conclusion that: “Upgrade of wastewater treatment required in Stamford to accommodate large scale development” is not justified in drawing this conclusion from the WCS. This will constrain development on Empingham Road site. Our evidence demonstrates 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. Anglian Water confirms sufficient capacity exists currently at the Stamford WwTW to accommodate the development of the Empingham Road site, and there is no need for a phased approach or upgrades as a result of development. 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.

Officer’s Response
Changes proposed to the plan arising from the WCS (Changes WCS1-16) reflect the findings of the Water Cycle Study which was prepared based upon information and evidence provided by Anglian Water. The WCS should be seen as a strategic document which highlights potential constraints and points developers, landowners and the water agencies to these constraints to ensure appropriate consideration at an early stage in site masterplanning.
Summary of Comments

no clear justification for allocation of specific sites to particular five-year phases, based on site characteristics or timescales for delivery. 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 (proposed in the Schedule of Changes issued in December 2011) 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. 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 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

Officer’s Response

The phasing of development allows for the maintenance of a continuous 5 year supply of housing land across the plan period. Adoption of the DPD will help increase 5 year supply through allocated sites across the District. This approach is entirely consistent with the provisions of the Core Strategy, particularly para 5.1.6.
### Summary of Comments

No clear justification for allocation of specific sites to particular five-year phases in this policy, based on site characteristics or timescales for delivery. 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 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. Specific concern is phasing of land between Empingham and Tinwell Roads under reference STM1e (the Empingham Road site) within the period 2016-2021. Phasing is not consistent with appraisals completed by Anglian Water specifically for the proposed development of the site (see Appendix to this representation). 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 site can be provided as part of the development proposals. 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.

### Officer’s Response

Evidence from AWS relating to the ability to service this site is welcomed. However, phasing of allocations is not just about infrastructure capacity. It is also about ensuring a continuous supply of deliverable housing land throughout the plan period.
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). 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.

Officer's Response
Evidence from AWS relating to the ability to service this site is welcomed. However, phasing of allocations is not just about infrastructure capacity. It is also about ensuring a continuous supply of deliverable housing land throughout the plan period.
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<tr>
<td>487941</td>
<td>Mr M Newton</td>
<td>Water Cycle Study</td>
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**Comment ID:** SASub254  
**Type:** E-Mail

**Summary of Comments**  
We support the proposed change (recommendation for UPM) 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.

**Officer's Response**  
AWS has confirmed that the UPM is underway.
The Detailed Water Cycle Study compounds this unfairness [grouping STAM14 with others] 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. 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. Sewerage Capacity: Study considers constraint to development is that all sewerage system flows to Hudds Mill. 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. 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.

The detailed water cycle study was prepared to consider all the sites which were considered to be available and suitable for development in all other respects. As such the study does not consider all 250+ sites which have been consulted upon, in the two consultation documents. The Site Assessment process was conducted in two stages where those sites with identified highway, flood risk, heritage etc constraints were determined to be unsuitable for further consideration. This gave a "long - short list" of sites to consider in further detail. The detailed water cycle study considers those "long - short list sites" STAM18 for the purposes of the Water Cycle Study incorporates the sites previously consulted on and referenced as STAM14, 15, 16 and 17. These were considered as a combined site by the detailed Water Cycle Study, as some of the smaller parcels (in particular STAM14 and STAM17) had been discounted as part of the first phase of the site assessment process. The reasons these sites were discounted for are set out in the Evidence Document, and are summarised as not suitable for allocation because of access, landscape impact and flood risk constraints.

The Water Cycle Study is the evidence for highlighting potential constraints within the water cycle. More detailed Pre-development enquiries requested by developers/land owners are the next step to consider the potential constraint in detail and identify deliverable solutions. This process has been followed for a number of allocated sites and reveals that the constraints are either not as first expected in the WCS or can be overcome through technical solutions within the existing infrastructure. This is the case for the allocated site STM3. AWS has also
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

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. 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.

begun work on the UPM recommended in the WCS, the results of which are expected to be available for consideration by the Inspector before the close of the Examination period. Discussion is ongoing between the Council, AWS and EA on water cycle study constraints to ensure that the issues identified within the study are addressed in an appropriate and timely manner.

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**Summary of Comments**

Hopes the WCS will help to influence allocations to positively address the water issues. Policies should promote flood resilient and resistance measures to mitigate impacts of flooding. NE supports use of SuDS and recommend that proposals be linked to GI network and that reference should be made to GI Strategy to maximise opportunity to create enhanced multifunctional network of green spaces across district. [reiteration of previous comments]

**Officer’s Response**

comments noted. These issues are already covered by Core Strategy policies EN1, EN2 and EN4.
Summary of Comments
Confirm objection to the phasing contained within Policy DE1. Client's consultant engineers M-EC, have engaged with AWS because the phasing is entirely due to the WCS. Phasing is being proposed entirely because of the perceived lack of capacity at The Deeping WwTW for additional flows as a result of uncommitted development - a detailed technical matter one which M-EC as consultant engineers are experienced in dealing with. 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. Whilst the WCS is a useful part of the evidence base, its findings in regard to the WwTW should not be translated 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 (not supported by the evidence) or else none of the sites should be held back (which is the correct approach to take). 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. In conclusion, foul drainage within the catchment area of The Deepings WwTW will be self-managed by AWS and the EA. No need for additional restrictions on phasing at The Deepings. Allowing AWS and EA to manage the situation will ensure greater flexibility delivery of development should for example improvements come forward prior to the time periods in the current draft of the SAP DPD. 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.
Consultee: Mr William Strain  
Agent: Mr Raymond F Kilsby  
Consultation Point: Water Cycle Study

Comment ID: SASub258  
Type: E-Mail

Summary of Comments
Believes WCS reinforces previous rep. WCS advises either strategic site or smaller sites brought forward. STM1e scores badly, requires high capital expenditure and is not a short-term solution. Smaller sites, with minimal constraints, should be identified for early development and STM1a is enlarged to include Client's land.

Officer's Response
The WCS does identify (on a map) the areas at risk of flooding. This is incorporated with the SFRA in which Flood Zone 3 covers a large part of the centre of the site referred to as STAM14. The sewerage constraints identified in the WCS have been concluded out of evidence and information provided by AWS and the IDBs, and provides a starting point from which more detailed assessment of constraints can be made. This work confirms that the allocated site can be serviced without need for improvements to the sewer network.
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. SK cannot demonstrate a five year deliverable supply of housing. Embargo on housing in MD will exacerbate this situation, especially as the 100 dwellings envisaged to be delivered in 2011-2016 will not now come forward. There are identified constraints in Stamford - questionable whether CS objectives can be fulfilled. Impacts of WCS on the DPD also have implications for delivery of housing (CS Policy H1). DPD is unsound because it is not in accordance with policies in adopted CS.

**Officer's Response**

The WCS has been prepared over a period of months. Part 1 was prepared and completed in August 2011, and its conclusions were used to determine which sites to allocate. Part 2 was a refinement of Part 1, and considered a shortlist of allocated sites in greater detail. While its conclusions did not necessarily change the headline conclusions of Part 1, it did provide additional information. Part 2 was prepared in close liaison with SKDC, EA, AWS and the IDBs, and final publication was delayed because of the need to incorporate detailed comments from these agencies into the text. The phasing of development allows for the maintenance of a continuous 5 year supply of housing land across the plan period. Adoption of the DPD will help increase 5 year supply through allocated sites across the District.
26481 Ms Jennifer Dean
Anglian Water

Comment ID: SASub261
Type: E-Mail

Summary of Comments
confirms UPM is underway for Stamford [should take about 3 months].
additional capacity required at Deepings and Harlaxton. Long Bennington site
does not impact on sewerage issue. have strategy in place to meet demands at
Marston [see GAAP]. suggests various changes to wording.

Officer's Response
Noted, clarification from AWS welcomed. Ongoing discussion between
the council EA and AWS continues to address the constraints identified by
the WCS in an appropriate and timely manner. An update paper on WCS
issues will be prepared in advance of the examination hearing sessions to
pull together more recent studies and information from AWS and EA.
Site Allocation DPD: Submission October 2011 - Summary of Representations and SKDC Response

Consultee
605314 Annette Hewitson
Environment Agency

Consultation Point
Water Cycle Study

Comment ID: SASub260
Type: E-Mail

Summary of Comments
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.

Officer’s Response
Support for changes WCS1-WCS16 welcomed. Issues of phasing of site can be addressed via further work undertaken by developers with AWS. Evidence has been submitted which appears to show that these constraints have been overcome - or can be overcome in advance of the phasing constraints identified in the WCS, or that the phasing does not necessarily need to be changed. Ongoing discussion between the council EA and AWS continues to address the constraints identified by the WCS in and appropriate and timely manner.