### Main Modifications to the SAP Submission (June 2012)

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>662667 Larkfleet Limited c/o Bidwells</td>
<td></td>
<td>SAPMM001</td>
</tr>
</tbody>
</table>

**CommentID:** SPMM51

#### Summary of Comment

Proposed modification SAPMM001 is unsound because it does not accurately describe which provisions of the Localism Act 2011 have been brought into effect.

#### SKDC Response

Agree with comment made. To address this, suggest that the end of the first sentence which says "the main provisions of which came into effect in April 2012" is deleted. The same wording is used in the GAAP (GAAPMM3). If the above amendment is considered appropriate, the wording in the GAAP should be similarly amended.

---

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>661831 Ms Jo Lavis</td>
<td></td>
<td>SAPMM001</td>
</tr>
</tbody>
</table>

**CommentID:** SPMM19

#### Summary of Comment

The modifications do not introduce changes to approach or policy that make the DPD in conformity with the NPPF. Seeks changes in assessing development needs of rural communities. Seeks policy to allow market housing on rural exception sites.

#### SKDC Response

Policy SAP2 is consistent with and in conformity with Policy H3 of the adopted Core Strategy. It is also considered to be consistent with paragraphs 54 and 55 of the NPPF in that it allows the Council to be responsive to local circumstances and takes a positive approach to meeting local needs for affordable housing. The spatial approach set out in the Core Strategy promotes sustainable patterns of development, ensuring that housing development can take place in those settlements where it can support existing community facilities and thereby help enhance and maintain the vitality of rural communities. Para 54 of the NPPF does not require LPAs to include a policy which allows for market housing to supplement affordable housing schemes. It does
Main Modifications to the SAP Submission (June 2012)

13/08/2012

imply that this can be considered where significant amounts of affordable housing would be delivered to meet a local need. Significant amounts of affordable housing in small rural communities would be inappropriate and largely unsustainable and it is unlikley that the level of need for significant numbers of affordable homes could be demonstrated in smaller villages either. However, the provision of affordable housing within the towns and Local Service Centre villages, which is covered by the CS Policy H3 can use market housing to facilitate affordable housing development, in fact the policy recognises that most affordable housing within the towns and larger villages will be delivered in this way.

Consultee

Agent

Consultation Point

Summary of Comment

We believe that there is a fundamental need to review the Core Strategy before March 2013, if for no other reason than the issuing of the NPPF but most particularly, and recently, the issuing of the detailed Census information.

If there is an acceptance of the review of the Core Strategy before March 2013 then realistically the Site Allocation and Policies DPD should properly wait for the review of the Core Strategy and those documents should be taken forward in tandem.

SKDC Response

The Council do not consider that there is a need to delay the examination of the Site Allocation and Policies DPD at this time.

It is for the Council to determine when a review of the Core Strategy should take place, bearing in mind the provisions and implications of paragraphs 214 and 215 of the NPPF, and the extent of any review: it may be only a focused partial review is required. In hindsight, the wording of modification SAPMM002 is perhaps misleading in that whilst a scoping of a review could be completed by March 2013, following the conclusion of the examination process of the Site Allocation and Policies DPD (and Grantham Area Action Plan), any review process itself would not.

The same wording is used in the GAAP (GAAPMM05). If the above amendment is considered appropriate, then the wording in the GAAP
should be similarly amended.

Consultee: Larkfleet Limited
Agent: MR DAVID BAINBRIDGE
Consultation Point: SAPMM002
CommentID: SPMM52

Summary of Comment
The Council should take a definite position on the need or otherwise for review of the Core Strategy in light of publication of the National Planning Policy Framework. The NPPF was published on 27 March 2012 and therefore the Council has had in excess of 3 months to decide on its position.

SKDC Response
See response to SPMM25

Consultee: Mr Paul Procter
Consultation Point: SAPMM003
CommentID: SPMM10

Summary of Comment
Selection of sites for development still ignore many of the items in core strategy selection process is faulty.

SKDC Response
This modification relates to the Council’s Vision for the Development Plan, which seeks to ensure that growth occurs in the most sustainable locations throughout the District.
Summary of Comment
Reference is made in SAPMM003 to delivering the Local Plan. Under Appendix 2: Glossary in the SAP DPD, 'Local Plan' is described as: 'The Plan produced under the former planning system by the District'. The LDF Vision in the SAP DPD should not be intended to deliver the Local Plan under the former planning system.

SKDC Response
A minor modification (SAPMOD33) has been proposed which updates the definition of Local Plan in the context of NPPF and Localism Act changes. No change is needed to the text at SAPMM003.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>662667 Larkfleet Limited</td>
<td>c/o Bidwells</td>
<td>SAPMM004</td>
</tr>
<tr>
<td>CommentID: SPMM54</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Summary of Comment
The reduced provision from 8,250 new homes to 5,940 new homes across the District (excluding Grantham) up to 2026 is not adequately explained and it is not supported by a simple addition of the housing requirements for the District (excluding Grantham) at Policy H1 of the Core Strategy.

SKDC Response
The change has been made to reflect a factual correction to the overall number of houses required by the Core Strategy for the area covered by this DPD over the plan period. It is, therefore, derived from Core Strategy Policy H1 where the Grantham requirement (7680) has been subtracted from the District requirement of 13620, giving a total of 5940. This change was proposed in response to a representation made by this representor [ref SA Sub117] to the submission plan.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>475360 Mr Paul Procter</td>
<td></td>
<td>SAPMM004</td>
</tr>
<tr>
<td>CommentID: SPMM11</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Main Modifications to the SAP Submission (June 2012)

13/08/2012

Restricting development to LSC's is unsound. The principle of sustainability in non LSC's is bogus.
Small villages are not in danger of becoming Ghost villages. Quite the reverse. Farm houses and converted crew yards sell very well, even if no facilities exist in the village.

This modification corrects a typographical error in the amount of housing to be provided for throughout the District. It aims to ensure sufficient housing development in terms of sites, sizes, type and tenure and affordability, to satisfy the Districts housing needs.

Consultee Agent Consultation Point
662667 Larkfleet Limited c/o Bidwells SAPMM005

CommentID: SPMM55

Summary of Comment
Village selection assessment should be refreshed to take account of the up to date position of statutory undertakers. There are no highway or drainage constraints to the delivery of housing at BAT02. This site should be allocated for residential development.

SKDC Response
The letters from LCC highways and Anglian Water relating to the potential development of these sites are acknowledged. However, it should be noted that the site assessment process was undertaken in light of the information available to officers from all relevant sources at that time. Whilst the highway objection seems to have been removed there are clearly still issues of concern relating to foul water disposal in the wider area in which Baston sits. The Water Cycle Study process seeks to ensure that where such issues have been identified they are addressed in a comprehensive and planned manner through appropriate allocations in the DPD. The Village capacity assessment together with the site assessment process revealed that Baston was not a preferred location for an allocation being highly vulnerable to flood risk, some distance from the WwTw, having no full time doctors and there being no support from the parish for additional development in their village.
It should also be noted that the site BAST02 is a large flat site extending away from the village. Development of this site would change the form and nature of the village and would have a significant impact on the local landscape. As access to the site would be derived through an existing
Main Modifications to the SAP Submission (June 2012)  13/08/2012

housing estate it is considered that the residential amenity of existing residents would be compromised if the site were developed.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>662679 Bullimore's Sand &amp; Gravel</td>
<td>Ms Jenna Conway Heaton Planning Ltd</td>
<td>SAPMM005</td>
</tr>
</tbody>
</table>

CommentID: SPMM63

Summary of Comment
Question the effectiveness and deliverability of the Site Allocations DPD and its soundness. The Council is relying heavily on a significant proportion of new housing being delivered through strategic housing allocations in the main urban areas. Whilst we do not object in principle to this approach, we have concerns regarding the inflexibility of the Site Allocations DPD should there be delay in major sites being brought forward for development. Any delay will not allow for an adequate year on year supply to meet housing demand.

SKDC Response
The Council has prepared a five year land supply paper which demonstrates a 5.2 year supply of deliverable sites, in addition a buffer of up to 320 homes (almost 10%) can be identified on proposed allocations in later phases of the plan period which could be brought forward to provide choice and competition in the market, as required by the NPPF. Sites identified within the first phase of development in the SAP are not constrained by infrastructure capacity concerns.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>260968 Mr Tim Lee</td>
<td>President Stamford Chamber of Trade and Commerce</td>
<td>SAPMM005</td>
</tr>
</tbody>
</table>

CommentID: SPMM24

Summary of Comment
Our Chamber believes the background paper entitled "Site

SKDC Response
Comments noted.
Main Modifications to the SAP Submission (June 2012)

Allocations and Policies DPD - Selection Process for Sites and Villages" to be self serving and not a true reflection of the processes and methodologies actually utilised by the Council in its selection of sites for allocation. We suggest that a rigorous examination of the document and its supporting technical assessments at the November 2012 Examination Hearings will show this to be the case, thereby rendering the SAP 'unsound'.

Consultee
475360  Mr Paul Procter
CommentID: SPMM12

Summary of Comment
Restricting development to only 6 LSC's throws an excessive burden on those 6 communities. In the case of Harlaxton, a 29 house development has only just been completed in 2009, and continuing with another development will spoil the character of the village. Smaller developments in a larger number of villages is still a more fair and sensible policy.

SKDC Response
Comments noted. This modification refers to the accompanying Background Paper: Selection Process for Sites and Villages. This explains how the choices about where to allocate land for development were made. As the paper explains, smaller sites in a larger number of villages would have impacts in terms of the amount of affordable housing which could be provided and would potentially make some sites unviable, and therefore undevelopable.

Consultee
26270  Miss Gill Brown
Planning Assistant
Bigwood
CommentID: SPMM26

Summary of Comment

SKDC Response
Main Modifications to the SAP Submission (June 2012)

Whilst we support the strategy that development should be located in the urban areas of Stamford, Bourne and Deepings as well as the 16 identified Local Service Centres, the publishing of the Census information brings into question the basis of the calculations and statistics for the overall housing quantum for 2006-2026 when it is now known that this quantum figure is certainly insufficient to accommodate proper need. It follows therefore that the allocation of that housing quantum to Stamford, Bourne, the Deepings and the Local Service Centres must properly be reviewed and the numbers appropriately increased. In particular we would make the point that any centre that has a single locational strategic allocation, such as Bourne, needs to be reconsidered in the light of the NPPF and the need to provide a 5 year housing supply plus, we would argue, 20%. Therefore our submission is that there should be a review and assessment again of the site selection process.

The Council believes the methodology which underpins the site and settlement selection process to be sound.

The quantum of housing provided within the plan will ensure that a continual five year supply of housing land is available throughout the plan period in line with the requirements set out in the adopted Core Strategy. The allocations also provide for additional housing land above the CS requirement which will provide for an appropriate 5% buffer as required by the NPPF.

Consultee: Mr Tom Gilbert-Wooldridge
Agent: Planner
English Heritage

CommentID: SPMM8

Summary of Comment
We note that the new paragraph refers to a background paper “Selection Process for Sites and Villages” for allocations in the Local Service Centres. Although the paper explains the process for selecting sites in villages, it does not address the concerns we have with the proposed allocation of Site LSC1e in Harlaxton and the lack of consideration given to historic environment issues (see our original representation SASub61).

SKDC Response
The Background Paper: Selection Process for Sites and Villages is clear that heritage issues are considered during the site assessment process: conservation areas, listed buildings and scheduled monuments are specifically mentioned at paragraph 3.2.4. The potential impact of development on any identified heritage assets, which includes Registered Parks and Gardens, was considered during the site selection process, as the Council’s response to representation SASub61 makes clear.
### Summary of Comment

The proposed modification states that in determining which sites to allocate, sites with planning permission were discounted. This approach has not been followed in allocating the employment site B1c in Bourne: the site is part of a larger area known as Elsea Park which has planning consent for a major residential development. Central to the extant planning permission is the approved site-wide masterplan which clearly depicts the disposition of uses over the site and more specifically the location of the non-residential elements. An area for employment use was approved towards the west of the site and this is shown on the attached plan. This area of land does not correspond to the proposed allocation B1c, which is actually approved for residential purposes. Proposed allocation B1c is at odds with the previous Local Plan allocation and takes no account of the extant planning permission. The proposed allocation is neither sound nor deliverable as the land will simply not be released for this purpose. The Council has not been consistent in its approach and has wrongly allocated this land for employment use. Allocation B1c should be amended to reflect the outline planning approval.

### SKDC Response

It is acknowledged that the allocation B1c does not correspond to the area identified in the development Masterplan. Discussions are ongoing with the landowner/developer in an effort to resolve this situation, which may result in the need to amend the allocated site.
### Main Modifications to the SAP Submission (June 2012)

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>524547 Mr John Allen</td>
<td>Mr Mike Newton</td>
<td>SAPMM006</td>
</tr>
<tr>
<td>Commercial Estates Group</td>
<td>Boyer Planning</td>
<td></td>
</tr>
</tbody>
</table>

#### Summary of Comment
Support modification, but could be better justified for each proposed allocation with a statement setting out why the chosen site is the best available option.

#### SKDC Response
Support noted

---

### Consultee
26270 Miss Gill Brown
Planning Assistant
Bigwood

#### Summary of Comment
The site selection process needs to be reviewed properly in the light of the above [rep SPMM26] and the new data now available. In particular, and in respect of the points made, there must be now an appropriate and supportive rationale for additional housing allocations in Bourne.

A comparison of the proposed employment allocation for Bourne is not borne out properly by balancing additional housing or appropriate additional allocations and therefore the provisions for Bourne are not Sound.

#### SKDC Response
The Council believes the methodology which underpins the site and settlement selection process to be sound. Housing commitments within Bourne total over 1600 homes, and includes a range of alternative sites to the large extension site at Elsea Park. There is no sound justification for increasing the amount of new homes for Bourne over the plan period. This issue was considered in detail by the Core Strategy Examintion, where the Inspector concluded that the approach to restrict additional housing in Bourne was sound.

---

### Consultee
443969 Mr Andy Rogers

---

Page 10 of 46
The use of the three major constraints listed in Paragraph 3.03 in respect of the first sift of sites selection process is considered to comply with the tests of 'soundness' and is supported. Restraining development within 'flood zone 3' is referred to in Paragraphs 100-102 of the National Planning Policy Framework (NPPF) which seeks to direct development away from land at the highest risk of flooding. In addition, evidence contained with the Council's Level 2 Strategic Flood Risk Assessment confirms that there are sufficient sites within the District, including LSC1f at Main Road, Long Bennington, that are identified as having no risk. Paragraphs 32 and 35 of the NPPF highlight the importance of providing a 'safe and suitable access' and the creation of 'safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians'. Set in this context it is considered appropriate for the Council to exclude sites from selection that would have difficulty in ensuring the safety of pedestrians and vehicle users. The capacity of the sewer network and treatment works to accommodate additional flow is considered to be crucial in the determination of which Local Service Centres (LSC) and sites can deliver new housing and when it can be built. This is reflected in Paragraph 162 of the NPPF which requires Local Planning Authorities to assess the quality and capacity of infrastructure for water supply and waste water and its treatment.

Summary of Comment

SKDC Response
Support welcomed.

Consultee
26270 Miss Gill Brown

Agent

Consultation Point
SAPMM007
Summary of Comment

Bourne needs additional Affordable housing provision to help to address the substantial need within the area and which is not met by the existing single strategic allocation on the south-west of Bourne. South Kesteven have failed to address the requirement to provide accommodation for the elderly and also accommodation for the elderly requiring care. A review of the Census confirms the significantly high level of the elderly as part of the overall population which is significant and which is a growth sector for the future, bearing in mind the increasing life span.

Both the Core Strategy and the Site Allocation and Policies DPD need to set out policies specifically to address this need and to provide allocations of land to meet this need. We make this point forcefully because the national house builders do not normally provide accommodation for the elderly requiring care, particularly in the form of nursing homes. Therefore the planning authority, in taking forward its planning policies, should properly and reasonably provide a planning policy base and seek to provide Site Allocations accordingly.

SKDC Response

The allocations within the Site Allocation and Policies DPD do not include 'specialist' housing, which could include elderly care accommodation and nursing homes. When such applications are made they will be dealt with on their own merits and with reference to the particular circumstances pertaining to the individual proposal. SKDC has worked positively in the past to deliver specialist accomodation for the elderly as well as extra care facilities, including two recent developments in Bourne. An outstanding planning consent exists for an additional extra care facility at South Road Bourne, which has not been developed as no end user has been found to operate the facility. No evidence has been provided that there is a demonstrable need to make provision for additional sites for this sort of facility.

Consultee

443969 Mr Andy Rogers
Capita Symonds

CommentID: SPMM37
Main Modifications to the SAP Submission (June 2012)

The theme of viability is considered to be crucial element in the site selection process and is one which runs through the NPPF. In particular, paragraph 173 of the NPPF states that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking'. Without an understanding of viability, development proposals may be insufficiently informed and potentially not deliverable. The list of constraints identified in Paragraph 3.04 are considered to reflect those issues that would have an impact on the viability of a proposed development and their inclusion in the site selection process is supported.

Comments noted.

Consultee  
Agent  
Consultation Point
490730  Mr Alan Hubbard  
The National Trust  
SAPMM008

CommentID: SPMM44

Summary of Comment
It is agreed that the Belton House and Park Setting Study is a relevant component of the background evidence for this DPD and accordingly it should be included in the list of documents identified at para 1.4.5.

Comments noted.

Consultee  
Agent  
Consultation Point
443969  Mr Andy Rogers  
Capita Symonds  
SAPMM009

CommentID: SPMM38

Summary of Comment

SKDC Response
Main Modifications to the SAP Submission (June 2012)

The importance of the subjective issues referred to in Paragraph 3.05 is reflected within the NPPF. The document recognises the importance of protecting and enhancing valued landscapes (paragraph 109) and the successful integration of new development into the natural, built and historic environment (paragraph 61). It is clearly evident from the Council's evidence base that there are insufficient brownfield sites capable of delivering the amount of development required for the District over the lifetime of the Site Allocations Plan, and therefore greenfield land will be needed to make up this shortfall. Where development is required on previously undeveloped land it is important that it should be kept away from those areas of inherent value, either in terms of the quality of landscape they provide or in the way that they shape the character of the built environment.

A supporting Landscape and Visual Impact Assessment was submitted with an application for housing on proposed housing site LSC1f. Whilst no decision has been made at the time of these submissions an officer report to Committee has stated that in their opinion the "proposed development would not result in any significant impact on the visual amenity of the area" (Source: Agenda to 24 July Development Control Committee : Agenda Item No:5, Ref: S11/2002/MJRO).

*******************************************************************************

Consultee: 475360 Mr Paul Procter

Agent: SAPMM009

Consultation Point: SPMM13

Summary of Comment

Clearly very little subjective consideration has actually taken place with regard to the proposed development in Harlaxton. It seems

SKDC Response

It is acknowledged that there are problems with parking, especially at school opening and closing times. To address this issue, the proposed
SKDC are attempting to justify a very poor allocation policy after the event, trying to make it fit the criteria they established and have ignored. Of course there will be a negative impact on the landscape. The new houses will eliminate the view over the parkland to the Manor. They will be built on ancient parkland, on the most traffic congested road in the village. The increase in traffic will be dangerous to users of the school and surgery, as well as residents.

The figures in this paragraph have been updated, but unlike those in the original text, have not been rounded. The change to unrounded figures provides less flexibility to change and suggest an overly precise and rigid ceiling to housing provision. Referring to a residual housing requirement, the text should prefix the words “at least” to align with the Core Strategy housing requirement which is defined as a “minimum level of housing development”.

Comments noted. The figures used in this change could be rounded and the words "at least" added for consistency sake (this phrase is used in the modification relating to development needs in the Deepings section [SAPMM021] and at paragraph 3.4.2.3 relating to the Local Service Centres both of which refer to rounded figures rather than exact numbers).
Main Modifications to the SAP Submission (June 2012)

**Summary of Comment**
The potential supply position has deteriorated to a significant extent in comparison with the October, 2011 Submission Document: margin of 9.3% supply in excess of requirement has now been reduced to nil, and the level of supply represented by the scale of outstanding planning permissions has also reduced significantly.

**SKDC Response**
The modification seeks only to update the situation with respect of housing land supply in Stamford. It, therefore, demonstrates that during the monitoring year (01/04/11 - 31/03/12) and between publication of the Submission plan in October 2011 and the Modifications in June 2012 some 78 homes had been built in the town. As a result, the overall requirement for Stamford for the remaining 14 years 2012-2026 had reduced by 78 houses to 660. The resulting change in potential supply also reflects this, with a reduction in the number of dwellings with planning permission (because they had been built in the previous year). Potential supply from proposed allocations has not changed and in respect of the five year land supply situation there remains sufficient housing land (in commitments and proposed allocations) to ensure a continuous five year supply plus a 5% buffer as required by the NPPF.

---

**Consultee**
26208 Mr Bruce Thompson
Diploma PLC

**Agent**
Mr Andy Butcher
Divisional Partner
Bidwells

**Consultation Point**
SAPMM010

---

**Summary of Comment**
It is considered that the main modification for Stamford does not contain sufficient flexibility to allow for unexpected changes in economic circumstances in the future. For this reason it is ineffective as the delivery of sustainable development is not ensured for the medium to long term stages of the plan period. SKDC has not acted on its duty to positively and effectively cooperate

**SKDC Response**
The modification referred to is a factual correction and is not meant to give higher housing requirement figures to provide flexibility. The housing requirement for Stamford for the plan period was established by the adopted Core Strategy, following examination of evidence of need, demand and supply considered as part of the RSS EiP. There is no intention of increasing these requirements through the preparation of the SAP DPD.
Main Modifications to the SAP Submission (June 2012)

with Rutland County Council through to implementation of the DPD to fully recognise the sustainability merits of the land at Quarry Farm, Stamford, to assist in meeting any unexpected local development needs in the future.

In order to make the modification effective and consistent with national policy, acknowledgement needs to be given to the ability of the site at Quarry Farm to provide sustainable development, should the need arise within the Local Plan timescale.

The Council is confident that it has fully satisfied the Duty to Cooperate throughout the preparation of this plan, and has worked together with Rutland CC to consider the relative merits of the land at Quarry Farm in relation to the other suggested sites within and on the edge of Stamford. The two authorities have been open to the potential to prepare a joint DPD to allocate land within Rutland to meet Stamfords need should it be necessary to do so (in accordance with para 179 of NPPF). However the site selection process identified that sufficient sites where available and developable within SKDC to meet the towns needs and it is not therefore necessary to prepare a joint plan to consider land in Rutland (or indeed in Cambridgeshire).

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>26318 Mr Cyril Day</td>
<td>Mr Cyril Day</td>
<td>SAPMM011</td>
</tr>
<tr>
<td></td>
<td>Highways Agency</td>
<td></td>
</tr>
<tr>
<td>Consultation Point</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CommentID:</td>
<td>SPMM45</td>
<td></td>
</tr>
</tbody>
</table>

**Summary of Comment**
The HA welcomes the modification.

**SKDC Response**
Noted.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>524547 Mr John Allen</td>
<td>Mr Mike Newton</td>
<td>SAPMM012</td>
</tr>
<tr>
<td></td>
<td>Commercial Estates Group</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Boyer Planning</td>
<td></td>
</tr>
<tr>
<td>Consultation Point</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CommentID:</td>
<td>SPMM69</td>
<td></td>
</tr>
</tbody>
</table>

**Summary of Comment**
The modification is a more accurate and effective statement of the

**SKDC Response**
Support for the change is welcomed. Reference should be made to the
possibility of constraints within the existing sewer network Work being undertaken by Anglian Water and its conclusions on specific sites, has already concluded that improvements will not be necessary in all cases and notably will not be required in the case of the draft allocation at Stamford that is the subject of Policy STM3. response of Anglian Water [SPMM75] which confirms that the UPM recommended by the WCS has been completed and that there is sufficient capacity within the waste water system to accommodate the amount of development proposed and location of growth proposed in Stamford. A further change to this paragraph may be considered necessary and appropriate to reflect the findings of the UPM.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>521755</td>
<td>Miss Laura Richardson</td>
<td>SAPMM012</td>
</tr>
<tr>
<td></td>
<td>Planning Liaison Officer</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Environment Agency</td>
<td></td>
</tr>
</tbody>
</table>

**CommentID:** SPMM74

**Summary of Comment**
Having reviewed the modifications we are pleased to observe that the Water Cycle Study and the Urban Pollution Management model has been further incorporated. Subject to Anglian Water Ltd being satisfied with the additional text on the wastewater collection, transport and treatment we have no further comments to make.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>26481</td>
<td>Ms Jennifer Dean</td>
<td>SAPMM012</td>
</tr>
<tr>
<td></td>
<td>Planning Liaison Manager</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Anglian Water</td>
<td></td>
</tr>
</tbody>
</table>

**CommentID:** SPMM75

**Summary of Comment**

**SKDC Response**
See response to SPMM69
Main Modifications to the SAP Submission (June 2012)

We support the proposed changes to reflect the WCS.

As an update to the modifications (3.1.14 and 5.2 Foul Sewerage Networks: Stamford), following the completion of the Water Cycle Study we proactively examined the impact of the Hudds Mill pumping station overflow on existing river quality for four different growth scenarios in Stamford through and Urban Pollution Management (UPM) study.

For each of the scenarios modelled, there is insignificant impact on the existing water quality due to overflow operation at Hudds Mill pumping station. The study concludes that the amount of growth considered could be accommodated by the existing sewerage network within the necessary environmental limits.

Summary of Comment

We have made extensive representations on the principle and detail of the phasing provisions within the DPD and their impact upon particular proposed allocations, and we would like to set out our views on the proposed modification in that wider context.

At the least Proposed modification SAPMM014 should include the same wording as that of Proposed Modification SAPMM025 as it applies equally to both towns:

"...where it is demonstrated that a site can be developed and needs to come forward to maintain this supply, some sites may be developed in advance of the phasing indicated in the policies."

See response to SPMM69

---

Consultee: Mr John Allen
Commercial Estates Group

Agent: Mr Mike Newton
Boyer Planning

Consultation Point: SAPMM014

CommentID: SPMM70

SKDC Response

Matters relating to the proposed phasing of allocations relate to the submitted plan. However, it is accepted that for consistency the additional wording which is included in mod SAPMM025 should also be included in SAPMM014.
## Main Modifications to the SAP Submission (June 2012)

### Consultee
26316  Mr Raymond Kilsby  
The W R Davidge Planning Practice

**CommentID:** SPMM6

### Summary of Comment
If it is considered appropriate to adopt the approach from paragraph 47 of the National Planning Policy Framework by the inclusion of "an additional buffer of 5%" to the overall provision of at least 760 new homes in Stamford (see paragraphs 2.6 and 2.4(a) above), then that buffer becomes an additional supply of 38 dwellings. Our Clients' site could make a contribution of some 25 dwellings towards that "buffer requirement".

### SKDC Response
Comments noted. Evidence submitted in support of this site would suggest that it might be suitable for allocation. However, as the site was only submitted in response to the Submission Plan it has not been subject either to public consultation or the full site assessment process including sustainability appraisal. In addition, sufficient land is allocated in the Plan to provide for the housing needs of Stamford for the plan period.

---

### Consultee
26270  Miss Gill Brown  
Planning Assistant  
Bigwood

**CommentID:** SPMM29

### Summary of Comment
See submissions SPMM26-28 with regard to the need to increase the number of dwellings provided within the Plan period. For Stamford there needs to be a policy alteration to reflect not only the 5 year supply but also to cater for a 20% uplift to appropriately reflect the need for longer term provision.

### SKDC Response
The Plan makes provision for sufficient housing to meet the requirements of Stamford over 15 years to 2026. This is in accordance with the requirements set out in the adopted Core Strategy. No evidence has been provided to support the claim that additional housing is needed in Stamford.
Main Modifications to the SAP Submission (June 2012)

The NPPF requires an LPA to demonstrate that there is a five year supply of deliverable housing land with an additional 5% buffer (20% if there has been persistent under-delivery). The Council believes it has consistently achieved a high level of housing development (demonstrated in the Statement of Five Year Housing Land Supply 2012-2017 submitted to the Examination), and is confident that the provision of a 5% buffer is appropriate for the District.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>524547 Mr John Allen</td>
<td>Mr Mike Newton</td>
<td>SAPMM017</td>
</tr>
<tr>
<td>Commercial Estates Group</td>
<td>Boyer Planning</td>
<td></td>
</tr>
</tbody>
</table>

CommentID: SPMM72

Summary of Comment

Strongly object to the minor change which removes the words "up to" from policy STM3 in relation to the provision of 14 ha of employment land. This change is contrary to the representation made by Boyer in respect of the employment allocation in STM2 of the submission plan. The change removes any flexibility within the policy and is therefore contrary to NPPF. The phrase "up to" should be reinstated.

SKDC Response

The change referred to is a minor change and was made following a representation from Boyer Planning to the apparent inconsistency between policies STM2 and STM3 in relation to requiring the provision of 14 ha of employment land as part of the mixed use allocation. Policy STM2 gives a degree of clarity and certainty about how much employment land is expected to be delivered by the mixed use development at Empingham Road, and how this contributes to the overall supply of employment land in the town. To ensure consistency the phrase "up to" was deleted from Policy STM3. Including the phrase "up to" within the detailed policy implies that there is an element of flexibility to provide between 10 and 14 Ha of employment land. The evidence of the NLP employment land study identifies that this site is the best location to deliver employment land in Stamford because of its proximity to the strategic highway network. The Council is anxious that development in this location delivers the maximum amount of new employment land possible, however, it also recognises that there needs to be an appropriate balance
between employment and housing uses on site. The quantum of employment land within the allocation was derived from early submission and discussion with the sites promoters, and to date no detailed evidence has been provided to show that 14 ha for employment development on the site affects the deliverability of a mixed use scheme. However the matter will be considered by the Examination as it forms part of a representation made to the submission plan.
It should be noted that the same change has been made to Policies DE2 and DE3 in relation to the urban extension in Market Deeping. No representation has been made to this minor change. However, the plan will need to be consistent in the way that it deals with both sites in each policy.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>26318</td>
<td>Mr Cyril Day</td>
<td>SAPMM017</td>
</tr>
<tr>
<td>Highways Agency</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CommentID: SPMM48</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Summary of Comment**
The HA welcomes the modification

**SKDC Response**
Noted

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>26270</td>
<td>Miss Gill Brown</td>
<td>SAPMM018</td>
</tr>
<tr>
<td>Planning Assistant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bigwood</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CommentID: SPMM30</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Summary of Comment**
Our initial analysis on housing completions for Bourne indicates that

**SKDC Response**
This modification makes a factual update of the completion and
the planning authority have not taken a sufficiently long and robust view of the needs and requirements and that the proposed rate of housing completions suggested for the rest of the Plan period is significantly below the number properly needed to provide balanced provision with reference to the employment allocation and an appropriate locational spread of housing, housing types and sizes for the whole of the rest of the Plan period. Significantly there needs to be single storey bungalow accommodation etc provided for Bourne to meet need.

commitment figures for Bourne. This shows that development rates in Bourne continue to show an increase and there continues to be a supply of deliverable land to meet much more than a five year supply. There is no change to the overall strategy for housing and employment development in Bourne which is consistent with the Core Strategy. The types of housing (single or two-storey building) are determined as a result of specific planning applications. No evidence is provided by the representor other than quoting newly published census data to support their claim that the housing strategy for Bourne should be changed.

Consultee
26318 Mr Cyril Day
Highways Agency

Consultation Point
SAPMM019

Consultee
415771 Mr and Mrs Asbach-Cullen

Consultation Point
SAPMM019

Summary of Comment
The HA welcomes the modification.

SKDC Response
Noted.

Summary of Comment
In the final sentence the word "should" has to be changed to "must". This is an imperative.

SKDC Response
This wording of the modification was provided by the Highways Agency and is considered to be appropriate.
Summary of Comment
An explanation is required about how the figure of 257 commitments has been derived it is not clear whether this is an accurate figure. If it is accurate the actual number of additional homes required should be 283 not 280.

SKDC Response
The figure of 257 is accurate and is clearly demonstrated in the most recent Five Year Housing Land Supply Paper. The word "almost" immediately before the 257 is however misleading and should be removed from the paragraph. Representation SPMM68 makes reference to the need for the equivalent paragraph relating to Stamford [SAPMM010] to use rounded numbers and the words "at least" for the residual requirement. The wording of these two paragraphs and the one which relates to the LSC's at SAPMM029 must be consistent and follow the same format. The Council would not be opposed to the use of rounded numbers for completions and commitments and use of the phrase "land should be allocated in this plan for at least xxx new homes".

SAPMM021 relates to paragraph 3.3.9, it does not propose any changes to the wording of paragraph 3.3.10 in relation to the provision of employment land in Deepings. Therefore, the second part of this representation should have been made to the Submission Plan.
Please see comments SPMM26-30 with regard to the requirement for increasing housing numbers etc for Market Deeping and Deeping St James.

There needs to be a policy alteration to reflect not only the 5 year supply but also to cater for a 20% uplift to appropriately reflect the need for longer term provision.

The Plan makes provision for sufficient housing to meet the requirements of the Deepings over 15 years to 2026. This is in accordance with the requirements set out in the adopted Core Strategy. No evidence has been provided to support the claim that additional housing is needed in the district.

The NPPF requires an LPA to demonstrate that there is a five year supply of deliverable housing land with an additional 5% buffer (20% if there has been persistent under-delivery). The Council believes it has consistently achieved a high level of housing development (demonstrated in the Statement of Five Year Housing Land Supply 2012-2017 submitted to the Examination), and is confident that the provision of a 5% buffer is appropriate for the District.

Consultee: Mr Cyril Day
Agent: Highways Agency
Consultation Point: SAPMM022
CommentID: SPMM47

Summary of Comment: The HA welcomes the modification

SKDC Response: Noted

Consultee: Larkfleet Limited
c/o Bidwells
Consultation Point: SAPMM023
CommentID: SPMM57

Summary of Comment: There is a typographical error in the last sentence of this proposed

SKDC Response: Agree, the word "contact" is correct as shown in the modification wording
Main Modifications to the SAP Submission (June 2012)

Modification i.e. 'contract with Anglian Water' is stated whereas this should be 'contact with Anglian Water'. Included in the schedule of Main Modifications. It has been wrongly transcribed into the tracked changes version.

Consultee: Larkfleet Limited  
Agent: c/o Bidwells  
Consultation Point: SAPMM026  
Comment ID: SPMM58

Summary of Comment

SAPMM026 proposes to cross out the year 2026 and replace it with the number 657. This must be a typographical error. Clarification is requested as to whether the number of 600 new homes was intended to be crossed out and replaced by 657 new homes? If so, then this is supported. If not further clarification is requested prior to the Pre-hearing meeting scheduled for 15 August 2012.

SKDC Response

The Schedule of Main Modifications makes it clear that it is the number 600 which should be replaced with 657, not the year. This has been incorrectly transcribed into the track change version. Support for the correct change is welcomed.

Consultee: Mr Cyril Day  
Agent: Highways Agency  
Consultation Point: SAPMM027  
Comment ID: SPMM49

Summary of Comment

The HA welcomes the modification

SKDC Response

Noted

Consultee: Mr Andy Rogers  
Agent:  
Consultation Point: SAPMM028
Main Modifications to the SAP Submission (June 2012)

CommentID: SPMM39

Summary of Comment
Specific reference in Paragraph 3.4.1.4 to the absence of any sewerage constraints at the Long Bennington allocated site is supported. The Detailed Water Cycle Study (WCS) has identified that a strategic solution is required to upgrade the sewerage infrastructure in the settlement. It has been estimated by the WCS that this could take up to five years to resolve. It is therefore welcomed that the Site Allocations Plan has provided clarification as to the extent of the works required in Long Bennington and that this work would not affect the delivery of much-needed affordable housing on the recommended allocated site.

The exclusion of proposed allocation site LSC1f from the strategic infrastructure works in Long Bennington was confirmed through the findings of a 'Pre-development Report' produced by Anglian Water, dated 3 January 2012 (Ref: 0906/SP169(001)). It concluded that the site falls within a different sewer catchment area than most of the village and thus is not constrained by the capacity issues which have been reported in Paragraph 3.4.1.4.

SKDC Response
Comments noted.

Consultee
490730 Mr Alan Hubbard
The National Trust

CommentID: SPMM42

Summary of Comment
National Trust remains of the view that the overall amount of

SKDC Response
The Council believes that the assessment process is sound and robust and
Main Modifications to the SAP Submission (June 2012)

Development allocated to the LSCs is excessive and that the inclusion of additional development within Colsterworth is not justified. To meet the requirements set out in the Core Strategy around 300 more houses need to be built over the plan period (700 having already been constructed). It is appropriate to have some flexibility in provision, but even using the higher NPPF buffer figure of 20% that would only be 60 units - not the 150 proposed. National Trust does not agree that Colsterworth is a suitable location for more development: it should be recorded as having seen considerable development in the last 10 years.

that the amount of housing allocated is appropriate both within the villages and towns. More than the residual number of houses have been allocated in all areas to allow for some flexibility to accommodate non-delivery of committed sites, and changes which may arise from different densities of development on allocated sites. The allocation of more land than is required by Policy H1 of the Core Strategy also acknowledges that this requirement sets a target for delivery rather than an absolute ceiling. It provides a choice of sites to enable competition in the housing market and the means of ensuring a continuous supply of housing land throughout the plan period. This approach is in accordance with requirements of paragraph 47 of the NPPF.

Colsterworth was identified as a suitable location for a small number of additional houses which could also bring forward the provision of an additional local shop to support its LSC function. The allocated site has been assessed using the criteria set out in the Core Strategy, and it was concluded that it will not have a detrimental impact on Woolsthorpe Manor.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
<th>Consultation Point</th>
</tr>
</thead>
<tbody>
<tr>
<td>475360</td>
<td>Mr Paul Procter</td>
<td>SAPMM030</td>
</tr>
</tbody>
</table>

**Summary of Comment**

as per previous comments, the strategy of choosing only 6 villages for housing is unsound, as it places unfair burdens on those communities in terms of loss of landscape, extra noise and vehicle pollution.

**SKDC Response**

The quantum of development envisaged in each of the six LSCs is not large. It is considered that it can be accommodated in each of the villages without detriment to the existing settlement. It was considered that the same amount of development, on smaller sites in a larger number of villages, would have impacts in terms of the amount of affordable housing which could be provided and would potentially make some sites unviable, and, therefore, undevelopable.
Main Modifications to the SAP Submission (June 2012)

Summary of Comment
This modification is not sufficient to bring the DPD in conformity with the NPPF. Needs a different approach to assessing development needs in LSCs and other communities. Needs a more positive approach to development in rural areas as set out in NPPF para 55. Allocations in 6 LSCs marginalises evidence of affordable housing need in 2010 updated SHMAA. Allocations will result in an average of 2 new affordable homes per annum in only 2 LSCs, against a calculated need of 44 per annum [SHMAA]. Smaller sites should be allocated in across the District and an affordable target of 50% should be set.

SKDC Response
The allocation of smaller sites in a larger number of villages is likely to have an impact in terms of the amount of affordable housing which could be delivered and has the potential to make some sites unviable and, therefore, undeliverable. The adopted Core Strategy provides the overarching policy for development in the District. Core Strategy Policy SP3: Affordable Housing sets a target "up to 35% of the total capacity of a scheme" and to consist of housing of a type appropriate to the local need. This approach was considered in detail at the Core Strategy examination. The approach in the DPD is consistent with that of the Core Strategy and with the NPPF, in particular this approach is consistent with the Core Planning Principles.
The NPPF and Localism Act also promote the need to empower, involve and reflect the needs and aspirations of local communities. In preparing this plan the Council has worked closely with the communities in each of the LSC and non LSC villages. This work has shown that there is an overriding concern in many villages that too much development has already taken place and that key infrastructure and community facilites are unable to accomodate growth. This information has been used to inform the selection process.
The issue of cross subsidy of affordable housing in rural areas is addressed in response to rep SPMM19.
Summary of Comment
The LSC capacity assessment as outlined in Paragraph 3.4.3.1 is supported on the grounds that it is based upon an adequate, up to date and relevant evidence base which also reflects the strategy for plan making within the NPPF. Evidence produced in relation to a recent outline application for housing at the proposed housing site LSC1f on Main Road, Long Bennington supports the LSC selection process in that application has confirmed that (subject to appropriate financial contributions through the s106 agreement) there have been no objections in respect of issues relating to health, education, sewerage, roads. This demonstrates that the settlement has sufficient infrastructure capacity to accommodate a development of up to 35 dwellings.

SKDC Response
Comments noted.

Summary of Comment
This modification is not sufficient to bring the DPD in conformity with the NPPF. Needs a different approach to assessing development needs in LSCs and other communities. Needs a more positive approach to development in rural areas as set out in NPPF para 55. Allocations in 6 LSCs marginalises evidence of affordable housing need in 2010 updated SHMAA. Allocations will result in an average of

SKDC Response
See response to SPMM21
Main Modifications to the SAP Submission (June 2012)

2 new affordable homes per annum in only 2 LSCs, against a calculated need of 44 per annum [SHMAA]. Smaller sites should be allocated in across the District and an affordable target of 50% should be set.

---

Consultee: 661831 Ms Jo Lavis
Agent: SAPMM032
CommentID: SPMM23

Summary of Comment
This modification is not sufficient to bring the DPD in conformity with the NPPF. Needs a different approach to assessing development needs in LSCs and other communities. Needs a more positive approach to development in rural areas as set out in NPPF para 55. Allocations in 6 LSCs marginalises evidence of affordable housing need in 2010 updated SHMAA. Allocations will result in an average of 2 new affordable homes per annum in only 2 LSCs, against a calculated need of 44 per annum [SHMAA]. Smaller sites should be allocated in across the District and an affordable target of 50% should be set.

---

Consultee: 662679 Bullimore’s Sand & Gravel
Agent: Ms Jenna Conway
Consultation Point: SAPMM033
CommentID: SPMM65

Summary of Comment
The Selection Process for Sites and Villages (background paper)

SKDC Response
See response to SPMM21

---

See response to SPMM21
Main Modifications to the SAP Submission (June 2012)

makes reference to how the LSC’s were identified within the Core Strategy. Identified LSC’s were considered the settlements with a range of localised services and facilities. It is therefore concluded that these are sustainable locations with the ability to accommodate growth. The Site Allocations DPD acknowledges that ‘some limited development in these villages will prevent local services becoming unviable and help to create more mixed and balanced communities’ (para 3.4.1.2). In addition, ‘a modest amount of growth should be directed towards the LSC’s to enable them to remain sustainable communities’ (3.4.1.2). The approach to allocate housing sites in just 6 of the 16 LSC’s undermines these Core Strategy objectives and the approach is therefore unjustified.

For example our site within South Witham is deliverable and within the SHLAA process was identified as the preferred site for development within the village due to a lack of constraints. The fact that the village does not have a doctor surgery and a limited bus service scores it poorly. However, in accordance with the objectives of the Core Strategy and the Site Allocations Document, development should be directed to LSC’s to facilitate the viability of these services.

Consultee  
415771 Mr and Mrs Asbach-Cullen

Consultation Point  
SAPMM033

Summary of Comment  
Your statement about "good regular bus access for Thurlby and Northorpe is misleading. The only bus service available to residents is daytime only, and passes the main settlement area, not through it. Many residents who wish to use the bus must either take a long walk down to the bus stops (and hence back up), or indeed drive to it and without constraint and suitable for development, however, it was noted that both sites were greenfield extension sites and may be affected by noise and dust from the nearby quarry. As such they were identified as suitable, but low priority sites.

The Village Assesment process, however, concluded that there was no full time doctors within the village and a lack of good regular public transport meant that it was less suitable for additional growth. In addition there is no overiding need to provide affordable housing in this location and the Parish Council did not support the sites or the need for additional homes. As such it was concluded that South Witham was not a preferred location for an allocation.

SKDC Response  
It is not considered that the statement regarding the bus service to Thurlby is misleading: the bus company timetable shows that the service runs throughout the day until between 7 and 9pm in the evening [Monday to Saturday] and until late afternoon/early evening on Sundays and Bank Holidays. The distances to the bus stop in Thurlby are no greater than for
Main Modifications to the SAP Submission (June 2012)

park nearby. You must not attribute the bus service a status that it does not enjoy.

residents of other villages and in large parts of the towns. Thurlby is located on the strategic bus route corridor which connects Bourne with the Deepings and Peterborough. This service compares favourably with most of the District's villages and towns.

Consultee
662667 Larkfleet Limited
c/o Bidwells

CommentID: SPMM59

Summary of Comment
The sites at LSC selected for residential development is based on an out of date and inaccurate evidence base i.e. the village selection assessment and the entire process is unsound.
It has been demonstrated through correspondence between consultants acting for Larkfleet Limited, Lincolnshire County Council has Highway Authority and Anglian Water Services as Drainage Authority that the findings under the village assessment in respect of the following site are inaccurate in respect of land off Chesham Drive, Baston. This site has been referred to as BAST02. Letters from AWS confirming that the capacity issues at The Deepings WwTW is not a constraint to residential development and LCC have confirmed there are no highway constraints to residential development. Previously the Council had assessed these as major constraints.

SKDC Response
The letters from LCC highways and Anglian Water relating to the potential development of these sites are acknowledged. However, it should be noted that the site assessment process was undertaken in light of the information available to officers from all relevant sources at that time. Whilst the highway objection seems to have been removed there are clearly still issues of concern relating to foul water disposal in the wider area in which Baston sits. The Water Cycle Study process seeks to ensure that where such issues have been identified they are addressed in a comprehensive and planned manner through appropriate allocations in the DPD. The Village capacity assessment together with the site assessment process revealed that Baston was not a preferred location for an allocation being highly vulnerable to flood risk, some distance from the WwTw, having no full time doctors and there being no support from the parish for additional development in their village.
It should also be noted that the site BAST02 is a large flat site extending away from the village. Development of this site would change the form and nature of the village and would have a significant impact on the local landscape. As access to the site would be derived through an existing housing estate it is considered that the residential amenity of existing
residents would be compromised if the site were developed.

Summary of Comment
Harlaxton already had 3 substantial housing developments at the Parklands, Daybrook, and Gregory Closes. Only 3 years ago another 29 house development was added, at Strood Close making 4 estates in one conservation village. Another 30 house estate is NOT a modest development. It is not required for the rural community. Proper investigation would reveal that the houses are mostly purchased by commuters who only come here because of cheaper housing. The extra population only add to the burden of stretched school and other resources. Existing residents seem to have no rights whatsoever, and are forced to put up with extra noise, particularly from traffic. The idea of stimulating less use of the car is pure fantasy. Anyone living in Harlaxton will be aware of how few residents go on foot.

SKDC Response
The village of Harlaxton has been designated as a Local Service Centre: it acts as a focal point for other rural communities because of its school and medical centre. It contains a range of services and facilities to meet the daily needs of residents, and is in close proximity to a large town for employment and other needs not met locally. There are acknowledged car parking issues connected to the school and the medical centre and these will be addressed by development of the allocated site. The Education Authority confirms that the school has capacity for additional pupils and the Medical Centre confirms that the practice can accommodate extra patients. There is support from the Parish Council [and others] for a small development on the allocation site: it is the Parish Council preferred site. The 30 dwellings envisaged will increase the housing stock by approximately 8%, and will enable the provision of 10 affordable homes for local people in housing need. It is considered that an 8% increase in housing stock can be regarded as modest growth.
Main Modifications to the SAP Submission (June 2012)  

Summary of Comment
The sites at LSC selected for residential development is based on an out of date and inaccurate evidence base i.e. the village selection assessment and the entire process is unsound. It has been demonstrated through correspondence between consultants acting for Larkfleet Limited, Lincolnshire County Council has Highway Authority and Anglian Water Services as Drainage Authority that the findings under the village assessment in respect of the following site are inaccurate in respect of land off Chesham Drive, Baston. This site has been referred to as BAST02. Letters from AWS confirming that the capacity issues at The Deepings WwTW is not a constraint to residential development and LCC have confirmed there are no highway constraints to residential development. Previously the Council had assessed these as major constraints.

SKDC Response
The letters from LCC highways and Anglian Water relating to the potential development of these sites are acknowledged, however it should be noted that the site assessment process was undertaken in light of the information available to officers from all relevant sources at that time. Whilst the highway objection seems to have been removed there are clearly still issues of concern relating to foul water disposal in the wider area in which Baston sits. The Water Cycle Study process seeks to ensure that where such issues have been identified they are addressed in a comprehensive and planned manner through appropriate allocations in the DPD. The village capacity assessment together with the site assessment process revealed that Baston was not a preferred location for an allocation being highly vulnerable to flood risk, some distance from the WwTtw, having no full time doctors and there being no support from the parish for additional development in their village. It should also be noted that the site BAST02 is a large flat site extending away from the village. Development of this site would change the form and nature of the village and would have a significant impact on the local landscape. As access to the site would be derived through an existing housing estate it is considered that the residential amenity of existing residents would be compromised if the site were developed.

Consultee
443969 Mr Andy Rogers
Capita Symonds

CommentID: SPMM35

Summary of Comment
The selection of LSC’s as highlighted in Paragraph 3.4.3.4 is supported

SKDC Response
Support welcomed.
Main Modifications to the SAP Submission (June 2012)

on the grounds that the process undertaken by the Council is based upon an adequate and up to date evidence base which suitably demonstrates that the settlements chosen are those most capable of accommodating additional growth and also meeting the needs of their local communities.

In particular, the selection of Long Bennington as the first LSC to deliver new housing is supported on the grounds that it has the necessary infrastructure to support the identified level of growth but also that there is an acknowledged shortage of affordable housing to meet the needs of those local people currently on the Council's housing register. Both of these factors have been confirmed recently through the planning application at site LSC1f.

Page 36 of 46

Consultee
415771 Mr and Mrs Asbach-Cullen

Agent

Consultation Point
SAPMM034

CommentID: SPMM3

Summary of Comment
What do "modest allocations" and "modest growth" mean? The terminology is so loose as to render it meaningless. Any developer could challenge it.

SKDC Response
It is considered that development in LSCs should be restricted to that which is necessary to enable them to continue to function as sustainable local centres. It is not anticipated that this will be a great number of dwellings per year, and thus the term "modest" has been used to describe the suggested development growth. It is not possible, and indeed it is undesirable, to be prescriptive in assigning a precise figure for development. As no site has been allocated in Thurlby, the particular conditions pertaining at the time of any planning application will be a consideration in determining whether approval should be permitted. Policy SAP H1 sets out that infill sites will be of 10 houses or less, whilst redevelopment sites will be limited browfield area. The criteria of this policy have been included to enable development to be limited to a scale.
which is appropriate to the size and function of that settlement.

Consultee Agent Consultation Point
487931 Mr S P Hearn Concept Town Planning Ltd SAPMM035

CommentID: SPMM7

Summary of Comment
It is considered that the site allocations document is contrary to the requirements of paragraph 47 of the NPPF: requiring 5 year housing land supply + 5% [or 20% where there has been under-delivery]. Considered that this shortfall can be addressed by inclusion of Client's site [Royal Oak public house site at Long Bennington].

SKDC Response
The Council is satisfied that it has a 5 year supply of deliverable housing land and that the buffer of 5% can be provided by existing sites and by bringing forward the delivery where necessary of sustainably located sites which have been assessed as being suitable for development. The site [ref LB05 in the Suggested Sites Consultation document Oct 2009] was assessed as being unsuitable for development because the highway authority had objected. In addition the rear of the site lies within an open area leading down to the river. The open character of this area is important locally.

Consultee Agent Consultation Point
662667 Larkfleet Limited c/o Bidwells SAPMM035

CommentID: SPMM61

Summary of Comment
Mention should be made of the NPPF requirement for an additional buffer or 5% or 20%. This is mentioned elsewhere in the proposed modifications and should be mentioned in respect of the LSC.

SKDC Response
Agree. Suggest the Main Modification SAPMM035 is reworded using the same words included into paragraph 3.3.1.3 as SAPMM025.
**Main Modifications to the SAP Submission (June 2012)**

---

**Consultee**
Miss Gill Brown  
Planning Assistant  
Bigwood

**CommentID:** SPMM32

**Summary of Comment**
It is our submission that South Kesteven should, based upon its previous delivery, increase the buffer provision to 20% above the 5-year housing land supply requirement. It is not appropriate in planning terms for this planning authority to set the rate at a later date. It must be appropriate and sound to specify that rate now, and we say 20%.

We make the point forcefully, and in order to produce a sound Development Plan Document, that the planning authority should identify Reserve sites capable of being brought forward on review for housing during the Plan period. It has not been thought appropriate to do so to date but that exercise provides a more appropriate and robust Plan, better able to be justified to the public on a sound and rational planning base.

---

**Consultee**
Bullimore's Sand & Gravel

**Agent**
Ms Jenna Conway  
Heaton Planning Ltd

**CommentID:** SPMM64

**Summary of Comment**

---

**SKDC Response**
The NPPF requires a five year supply of housing land with an additional 5% buffer (20% if there has been persistent under-delivery). The Council believes it has consistently achieved a high level of housing development (demonstrated in the Statement of Five Year Housing Land Supply 2012-2017 submitted to the Examination), and is confident that the provision of a 5% buffer is appropriate for the District at this time. However, over the course of the remaining 14 years of the plan period this may change, therefore the wording of the paragraph allows for the rate of the buffer to be established on an annual basis depending upon circumstances. The Representor has provided no evidence to support their assertion that a 20% buffer should be used or given any reason why it should be set in stone at that rate for the whole plan period.
Main Modifications to the SAP Submission (June 2012)

The Site Allocation DPD is too prescriptive in terms of where development will be permitted and allows limited flexibility in the event that housing delivery is not being achieved. The approach taken by the council fails to take account of the real possibility in daily with large strategic sites. In our view a more wide spread distribution of growth is more likely to achieve the sustainability objectives outlined within the Core Strategy.

The DPD reflects the spatial strategy and distribution of development across the district which was established in the adopted Core Strategy. The allocation of large development sites within the towns of Grantham, Stamford and the Deepings are a consequence of this strategy to concentrate the majority of development in the four towns. The allocation of the prefered sites in the LSCs will provide for more than the residual housing requirement set out in H1 of the Core Strategy. As such the allocations provide for flexibility in the delivery of housing in these areas. The delivery of the urban extensions in the Stamford and the Deepings are phased to later phases in the plan period to allow for the resolution of any specific site constraints in the initial years. The Council is confident that housing delivery on these sites will occur as phased, and a supply of deliverable housing land will be maintained across the plan period.

Consultee
524547  Mr John Allen
Commercial Estates Group

Agent
Mr Mike Newton
Boyer Planning

Consultation Point
SAPMM040

Summary of Comment
Modification is supported but suggest additional minor wording change to the last sentence of the paragraph to read: If improvements take place in advance of the indicative time-frame provided in the WCS, or are demonstrated to be unnecessary, there may be scope for sites to come forward in advance of the phasing given in the policies.

SKDC Response
Agree, Council would not be opposed to further change to wording as suggested.

Consultee
Agent
Consultation Point

Page 39 of 46
Main Modifications to the SAP Submission (June 2012)

661831  Ms Jo Lavis

CommentID: SPMM20

Summary of Comment

The modification only goes part way to addressing the requirements of the NPPF in relation to economic development in rural areas as set out in paragraph 28. To bring the DPD into conformity there is also a need to change policies SAP3 and SAP4.

SAP3 should refer to supporting economic growth in rural areas, not simply the benefits to the rural economy.

SAP4 - requires significant amendment to provide a positive framework for economic development and expansion in villages. In particular it should not be confined to rural diversification. The NPPF notes that plans should support growth and expansion of all types of businesses. The criteria and requirement for all of them to be met should be amended to encourage and make it possible for appropriate development to proceed.

SKDC Response

This modification explains the Government's policy towards the rural economy. It provides the background to the Council's policies [SAP3 and SAP4] which are aimed at supporting local business in Local Service Centres and business development in the countryside [including but not restricted to rural diversification scheme]: recognising the role that they can play in supporting the rural economy by the provision of jobs and services and reducing the need to travel. Policies SAP3 and SAP4 are considered to fully meet the requirements of NPPF.

Consultee

475360  Mr Paul Procter

CommentID: SPMM17

Summary of Comment

If national policy is to protect the countryside from inappropriate development then any further development in the conservation village of Harlaxton is inappropriate.

There is no effective stimulus from SKDC regarding new rural jobs. There are a lot of meaningful phrases in this submission which amount to nothing concrete.

SKDC Response

This modification explains the Government’s policy towards the rural economy. It provides the background to the Council's Policy [SAP3] which is aimed at supporting local business in Local Service Centres: recognizing their role in supporting the rural economy by the provision of jobs and services and reducing the need to travel.
Main Modifications to the SAP Submission (June 2012)

Consultee: 415771 Mr and Mrs Asbach-Cullen
Agent: SAPMM042
CommentID: SPMM4

Summary of Comment
We consider that planning approvals S11/2957/FULL and S12/002/OUT[?] have already pushed development into the countryside, and not protected it. At all costs, the A15 corridor between Bourne and Market Deeping must be protected against further development creep, otherwise the environmental and rural impact will be intolerable.

SKDC Response
The approval S11/2957 is for the erection of a PH/Restaurant, access & car parking on land which, although technically in Thurlby Parish, is south of, and adjacent to, the built up part of Bourne. There is a history of planning approvals on this site for industrial uses [1989] and latterly for roadside services/filling station/hotel [2002] and public house/restaurant [2005]. The development would provide for a local facility which is suitable for a market town such as Bourne.

Consultee: 490730 Mr Alan Hubbard
Agent: The National Trust
CommentID: SPMM43

Summary of Comment
The inclusion of this new Policy and supporting text is welcomed and indeed it is the Trust's view that such a Policy is necessary to ensure that a key element of the historic environment is adequately addressed as part of the consideration of development proposals within its setting. However, the Policy as worded is considered to contain some flaws. These can be addressed by modest changes to the proposed wording.

SKDC Response
See response to SPMM9
### Summary of Comment
Welcome new policy, but consider that the defined extent of the setting of Belton House and Park is too restrictive. Suggest deleting "the extent of which is defined in the adopted Belton House and Park Setting Study" and substituting "using the adopted Belton House and Park Setting Study to inform the assessment of impacts" from first paragraph, and deleting "defined extent" from second paragraph.

### SKDC Response
Support welcomed. The change suggested by the respondent uses the words of the Belton House Setting policy included in the Grantham Area Action Plan. Accept the suggested change and the use of the same policy wording as Policy HE4 in the GAAP.

---

### Summary of Comment
The LPA have failed in their duty to properly allocate all of the employment land necessary for provision in Bourne over the Plan period. The proposed allocation excludes a parcel of land which, if the allocation is developed, will become inaccessible. This should be included in the allocation.

We consider that the allocation off Manning Road should be allocated for residential development - we have had discussions with...

### SKDC Response
The DPD includes sufficient employment land to meet the identified needs for the town for the plan period. Access to this site is only available through the site allocated for employment use off Meadow Drove (B1a).

Clarification is being sought from both the representor and LCC regarding the land required for additional playing fields for the Robert Manning School, and to confirm how realistic this proposal is. The Council is generally supportive of applications for community uses, including school...
Main Modifications to the SAP Submission (June 2012)  

Bourne Town Council about creating a Care Village on the site. We have been approached for land for additional playing fields for the Bishop Manning School, LCC is supportive, providing our Clients land is included. We believe the DPD should include the land as a formal allocation for school playing fields.

facilities.
The allocations within the Site Allocation and Policies DPD do not include 'specialist' housing, which could include elderly care accommodation and nursing homes. When such applications are made they will be dealt with on their own merits and with reference to the particular circumstances pertaining the individual proposal.

Consultee  
662667 Larkfleet Limited  
c/o Bidwells  
CommentID: SPMM62

Summary of Comment  
Object to the trigger dates included in schedule for DE3. Also under the targets for DE3 is reference to 140 affordable units. Site DE3 is for approximately 200 dwellings and the affordable housing policy is for up to 35% affordable housing. Therefore the 140 affordable dwellings is inaccurate and should be omitted.

SKDC Response  
The triggers are not meant to set a timetable for developers, they are for the Council's use as a mechanism to establish whether development is on track to be delivered within the phasing: this is an important part of a monitoring framework which will enable the Council to address issues of none delivery if and when they arise in a proactive rather than re-active way.
The affordable housing target for this site is indeed incorrect. The figure of 70 affordable units should be inserted into the table to accord with the Policy requirements of DE3.

Consultee  
26303 Mr Ian Lings  
Principal Policy Officer  
Planning&Conservation  
Lincolnshire County Council
Main Modifications to the SAP Submission (June 2012)

CommentID: SPMM73

Summary of Comment
Support modifications in broad terms as they strengthen and clarify the proposals for delivery, implementation and monitoring.

SKDC Response
Support welcomed.

Consultee
490730 Mr Alan Hubbard
The National Trust

CommentID: SPMM41

Summary of Comment
The National Trust notes that the Table setting out the Monitoring and Implementation proposals for the DPD has been supplemented, as necessary, to include a row at the end relating to new Policy SAP11. National Trust is pleased to support this addition and to confirm that it is content to be included as one of the named "responsible agencies".

SKDC Response
Support welcomed.

Consultee
26386 Miss Joyce Stevenson

CommentID: SPMM34

Summary of Comment
This section fails to mention Thulby/Northorpe where recent flooding throughout the village, led to sewer flooding in the street and homes,

SKDC Response
The modification reports the result of the Water Cycle Study as they relate to the allocated sites. As no sites have been identified in Thulby for
Main Modifications to the SAP Submission (June 2012)  13/08/2012

in Othorpe Lane, Thurlby. (Anglian Water, The Environment Agency, Thurlby Parish Council, SKDC (including Environmental Health), and LCC are among those who have been informed of this issue). The sewage network in the village is inadequate to cater for over 50 years of additional housing growth which has been linked to the system. Even the local pumping station failed. Thurlby/Northorpe has serious sewerage network issues which should be included in the Water Cycle Study and DPD, including a time table for implementation of an urgent network upgrade.

Consultee  Agent  Consultation Point
26318  Mr Cyril Day  Highways Agency  SAPMM047

CommentID: SPMM50

Summary of Comment
The HA welcomes the modification

SKDC Response
Noted

Consultee  Agent  Consultation Point
662021  Mr R Machin  Mr Nick Grace  Partner  Grace Machin Planning & Property  SAPMM048

CommentID: SPMM14

Summary of Comment
Welcome SKDC promoting Gonerby Moor as a favoured employment

SKDC Response
The respondent has misunderstood the purpose of the triggers in the
Main Modifications to the SAP Submission (June 2012)

location and object to the proposed wording of the implementation and monitoring section.
Object to the proposed 'trigger' of 2021 and feel this is a 'brake on development', further stagnating interest and investment.

Implementation and Monitoring Table. There is no intention to delay development at Gonerby Moor until 2021. The triggers are not meant to set a timetable for developers, they are for the Council's use as a mechanism to establish whether development is on track to be delivered within an appropriate period of time: this is an important part of a monitoring framework and will enable the Council to address issues of none delivery if and when they arise in a proactive rather than re-active way.
Policy SAP6 is clear that the Council is supportive of employment development at Gonerby Moor and does not set out any phasing or restrictions in terms of timing of development in this location.