South Kesteven Site Allocations and Policies Examination

Statement by Bidwells on Behalf of Diploma Plc

1. Bidwells acts on behalf of Diploma Plc in respect of its land holdings to the north of Stamford. The site lies entirely within the administrative boundary of Rutland County Council (RCC) but abuts the administrative boundary with South Kesteven District Council (SKDC). The land has been referred to as "Land at Great North Road, Stamford" and "RUT1" by SKDC for identification purposes in previous editions of its Site Allocations and Policies document. For simplicity the land shall hereby be referred to as "the Site".

2. Bidwells submits the following written representation, and following a recent email exchange with SKDC (see Appendix 1 attached) feels there is sufficient common ground to withdraw from appearing at the hearing sessions regarding Stamford policies, and Alternative Stamford Sites. Diploma Plc is now satisfied that its concerns raised in previous rounds of consultation to the Site Allocations and Policies document, namely a failure to co-operate with RCC have been satisfactorily addressed by SKDC in the lead up to the Examination.

3. For the benefit of background understanding, Bidwells made written representations to previous versions of the SKDC Site Allocations and Policies document. Up to the point of the Submission version of the document, the basis for these representations were as follows:

   - The Site should be included in the next plan period because it is in accordance with the provisions of the SKDC Core Strategy and the RCC Core Strategy. This point of submission remains valid although it is accepted that both SKDC and RCC had liaised to reach common agreement.

   It is acknowledged by Diploma Plc that the Site cannot be proposed for allocation in the SKDC Site Allocations and Policies document because it is situated outside of the administrative area of SKDC. However paragraph 2.8 of the RCC Core Strategy states that both local planning authorities would work together to prepare a joint development plan for the Site in the event that the development needs of Stamford could not be met within the administrative area of SKDC within the next plan period.

   The evidence base prepared by RCC and SKDC acknowledges the sustainability merits of the Site.
Had SKDC not worked constructively with RCC to produce a joint development plan for the Site, it clearly would not have been legally compliant or sound. Diploma Plc is now satisfied there is no basis to challenge the legal compliance of the plan in terms of procedure.

4. Diploma Plc is aware that new circumstances have arisen since earlier grounds of objection were lodged. SKDC has sought to address concerns raised by the Examining Inspector in the exploratory meetings through the publication of Main Modifications to the Site Allocations and Policies submission document, and an Assessment of Compatibility with the National Planning Policy Framework in June 2012.

5. Diploma Plc is now satisfied that its previous concerns in relation to the points set out at paragraph 3 above have been suitably addressed, in that:

   - SKDC has provided adequate evidence in the Assessment of Compatibility with the National Planning Policy Framework document of co-operation between itself and RCC in the preparation of the Site Allocations and Policies document.

   - Through ongoing liaison with planning officers at SKDC and RCC, the approach taken by SKDC in preparing the Site Allocations and Policies document is informed by co-operation with RCC. Diploma Plc therefore accepts that there is no need to consider the Site for immediate allocation provided evidence at this EiP confirms the development needs of Stamford (or any other wider district housing need to be directed to Stamford at the possible expense of Grantham) can be reliably delivered from the allocations in the current Site Allocations and Policies [Incorporating Modifications] document during the plan period.

6. In the event that evidence presented at this EiP confirms a concern for the reliable delivery of housing sites for Stamford, then the Inspector is invited to acknowledge the already confirmed sustainability attributes of the Site for the longer term growth of the town, a view shared by both SKDC and RCC (refer to Appendix 7.1 (paragraphs 6.1 to 6.12) and Appendix 7.2 of Bidwells’ written representations to the Site Allocations and Policies submission document) as well as an extract from paragraph 2.8 of the RCC Core Strategy (see Appendix 2 attached)).
Appendix 1

Email correspondence from Rachel Armstrong at SKDC – 11 October 2012
Dear Steven

Sorry for the delay in getting back to you, but as I'm sure you are aware the Grantham Area Action Plan examination is sitting this week and that has been my first priority. I was also awaiting a response from colleagues at Rutland CC on the matter.

Whilst I understand your concern, I do not believe there is any conflict between the wording of the Rutland Core Strategy and the approach taken by SKDC in preparing the Site Allocations Plan.

The Rutland CS clearly sets out that land north of Stamford would only be considered to meet the development needs of Stamford (not the development needs of Rutland) and if SKDC determined that additional land beyond the boundary was needed to meet that need, Rutland and SKDC would work together to prepare a joint plan. Having assessed the land both within SKDC boundary and in Rutland, SKDC is satisfied that the development needs of the town can be best met for the period to 2026 by land within its boundary and that there is no need to consider the land in Rutland.

The site has not fallen through the gap between two plans it has been fully assessed and both council's have determined that it is not needed in this plan period. This is not to say that it may never be considered but that it is not considered necessary or appropriate to allocate it in this plan period.

In view of this I don't think we will be able to agree a statement of common ground on this matter.

As to which day is most suitable I am not sure - the Inspector has set out the timetable and the issues to consider. I confess that I am puzzled about why he has some Stamford issues on session 3 and others at session 4, but that is his decision not mine. Your site is due for consideration at session 4 alongside the other areas considered for major development in Stamford - this seems logical. I wouldn't have thought session 8 was appropriate as this session will be considering omission sites in the LSCs. If you want to query this I would talk to the Programme Officer Fiona Waye - she is in the examination this week so an email might be the best way to contact her - f.waye@southkesteven.gov.uk or phone 07712 199 031

Kind Regards

Rachel Armstrong
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-----Original Message-----
From: Steven Butler [mailto:Steven.Butler@bidwells.co.uk]
Sent: 10 October 2012 16:22
To: RACHEL ARMSTRONG
Cc: Fiona Waye; Karen Sinclair; Andrew Blackwell
Subject: RE: Land at Great North Road Stamford. SKDC

Dear Rachel,

I refer to the email sent by my colleague Andrew Blackwell on 4 October (see below), which you were copied into by Karen Sinclair.
Given that the deadline for providing hearing statements is near we need to have a clear mutual understanding of the issues outlined in Andrew's email.

Could I therefore invite you to comment by the end of this week.

I look forward to your response.

Many thanks

Steven Butler
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-----Original Message-----
From: Karen Sinclair [mailto:K.Sinclair@southkesteven.gov.uk]
Sent: 08 October 2012 08:57
To: Andrew Blackwell
Cc: RACHEL ARMSTRONG
Subject: RE: Land at Great North Road Stamford. SKDC

Dear Andrew

Thank you for your e-mail and apologies for the delay in responding to you. I have forwarded your e-mail to Rachel Armstrong as she is leading on the Site Allocation and Policies DPD and asked her to respond to you with her thoughts on the issues you raise.

Regards
Karen

Karen Sinclair
Service Manager - Planning Policy & Partnerships South Kesteven District Council Council Offices, St. Peter's Hill Grantham, Lincolnshire, NG31 6PZ
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-----Original Message-----
From: Andrew Blackwell [mailto:Andrew.Blackwell@bidwells.co.uk]
Sent: 04 October 2012 12:27
To: Karen Sinclair
Cc: Steven Butler; Fiona Waye
Subject: Land at Great North Road Stamford. SKDC

Dear Karen

We are scheduled to appear at the EiP on several days but I welcome your thoughts given the stance we are wishing to take.

Essentially our case is that there appears to be a conundrum between the statements of SKDC and Rutland CC in respect of land north of Great North Road and which happens to lie in Rutland County.

Rutland CC have text within their adopted Core Strategy (para 2.8) which invites potential longer term growth at Stamford but only if your current Site Allocations Plan and Policies DPD seeks to endorse the location.
However, your Cabinet report of the 1st August 2011 says in para 6.9 that the appetite of Rutland CC to see growth at that location is low because sufficient sites are to be accommodated elsewhere within the Rutland County area. Hence your conclusion is that unless Rutland identify their own need to allocate their housing requirement on the edge of Stamford, then there is no need for your own Site Allocations and Policies DPD to make reference to the potential of the site.

It seems to me expression for the potential of the location is falling between policy "cracks" of the two authorities. As Rutland CC are yet to have their own site allocations DPD confirmed, the flexibility for the land at Great North Road is potentially being denied unnecessarily and prematurely to the outcome of the Rutland CC Site Allocations DPD by an absence of words (similar to that in para 2.8 in the Rutland CC Core Strategy) in the SKDC Site Allocations and Policies DPD.

I therefore wish to explore if there is a closer meeting of minds regarding the benefit of expressing the potential of developing the site, albeit in the longer term, and there is a will to have that potential now recognised in your Site Allocation and Policies DPD.

So as to avoid unnecessary time at the EiP it would help if you could confirm a position of common agreement on the issue.

If you feel there is no scope for common ground do you agree that the most relevant day for EiP attendance is Session 8?

Kind regards

Andrew

Sent from my iPad
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PLEASE NOTE THAT BIDWELLS CHELMSFORD MOVED OFFICES ON 3 SEPTEMBER 2012 TO THE ADDRESS ABOVE.

ALL OTHER CONTACT DETAILS REMAIN THE SAME.

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Appendix 2

Extract from RCC Core Strategy
g) avoid development of land at risk of flooding or where it would exacerbate the risk of flooding elsewhere (see Policy CS19);

h) contribute towards creating a strong, stable and more diverse economy (see Policies CS13, 14, 15, 16, and 17)

i) include provision, or contribute towards any services and infrastructure needed to support the development (see Policy CS8)

Strategic Objectives met:
All

The spatial strategy

2.5 The spatial strategy identifies broad locations for sustainable development in Rutland that will give access for all to services and facilities, while minimising the impact on climate change and protecting the natural environment, landscape and the unique character of the towns and villages.

2.6 About 1,900 new dwellings will be needed in Rutland in the period to 2026 in together with about 5 ha of new employment land and other development to support the local economy.

2.7 All new developments will be expected to promote sustainability and make the best use of previously developed land and vacant or under-used buildings in sustainable locations in accordance with national planning policies.

2.8 The parish boundary for Little Casterton adjoins the edge of Stamford, a market town within South Kesteven District, making this a relatively sustainable location albeit outside the administrative boundary for Rutland. As such there may be scope for the development within this area in order to support the sustainable growth of Stamford and to overcome infrastructure constraints. However, this will depend on the favoured preferred location for development in Stamford and will be determined as part of South Kesteven District Council’s Site Allocation’s Development Plan Document. If this should be regarded as a suitable location for development, it will need to be considered jointly with South Kesteven District Council and be subject to where appropriate, either a joint Site Allocations Development Plan Document or joint Area Action Plan developed in consultation with the local communities of Rutland and South Kesteven.