Hearing Statement

Larkfleet Limited
South Kesteven Site Allocation and Policies DPD
October 2012
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1 Introduction

1.1 This Hearing Statement has been prepared by David Bainbridge MRTPI, Partner in the Planning Division of Bidwells on behalf of Larkfleet Limited.

1.2 This Statement has been submitted to the Examination into the South Kesteven Site Allocation and Policies Development Plan Document (DPD). In particular this Statement responds directly to the Issues raised by the Planning Inspector in advance of the opening of the Hearing Sessions on 6 November 2012.

1.3 It is acknowledged that there is no need for participants in the Examination to prepare hearing statements where relevant points are already covered in the original representations.

1.4 Bidwells on behalf of Larkfleet Limited have participated fully in the preparation of the DPD as listed below however the issues raised by the Planning Inspector give rise to the requirement for comment as contained in this Statement.

1.5 Bidwells on behalf of Larkfleet Limited have participated in the following stages of preparation of the DPD.

- Responses submitted in respect of Proposed Main Modifications Consultation, July 2012.
- Responses submitted in respect of Submission Publication Stage, November 2011.
- Responses submitted in respect of Additional Sites Consultation, October 2010.

1.6 This Statement responds to the relevant Issues laid down by the Planning Inspector in respect of Session 6: Market Deeping and Deeping St James Sites. Where there is no response to an Issue this is because it is not considered relevant for example where the Planning Inspector has posed questions primarily intended for the Council to respond to.

1.7 This Statement does not exceed the 3,000 word limit.
Policy DE1, DE2 and DE3 Sites

2 Question: Does the Plan make employment provision in-line with Core Strategy requirements? 110, 112, 113

2.1 Response: The DPD makes provision for employment land within the parameters of Policy E1 of the Core Strategy.

3 Question: Have the issues of water infrastructure been adequately resolved? 78, 108?

3.1 Response: The DPD does not accept that site BAST02 can be adequately provided with a water supply and be connected to waste water infrastructure despite acceptance of these matters by AWS.

3.2 The DPD is not sufficiently flexible in respect of capacity and any phasing of residential development at The Deepings in particular DE3 should not be phased until after 2016 because this is not based on any assessment of evidence by AWS or EA.

3.3 A meeting between AWS, the Environment Agency, Bidwells and M-EC is scheduled for 23 October. From initial discussions it is understood that there is headroom for residential development at The Deepings which might not require phasing as proposed by the Council. Bidwells and M-EC will update the position at the hearing session 2 and no doubt AWS and/or EA will provide a further update.

DE1a

4 Question: Should the phasing of the site be amended in order to resolve drainage issues?

4.1 Response: Yes any phasing of this site needs to consider whether it is deliverable given differences in land ownership and concerns about the quantum of housing, this will be the third phase of residential development, off one point of access of Godsey Lane.

DE1d, DE2b and DE3

5 Question: Should DE1d be brought forward in phasing? 109, 107, 106

5.1 Response: There is no justification for the phasing from 2016 onwards as contained in Policy DE1: Housing Allocations in The Deepings and Policy DE3: Mixed Use Urban Extension in Market Deeping. Beyond the issue of maintaining a 5 year land supply, the only explanation for the phasing is contained in paragraph 3.3.2.2. which states:

“The phasing of sites has been influenced by evidence relating to infrastructure constraints, particularly wastewater infrastructure, which will require improvement to accommodate new housing.”
5.2 There is no description of what other 'infrastructure constraints' there are at The Deepings. I consider there are no other physical constraints which are not typical of such housing sites in a large village location. Therefore the only issue is waste water treatment. The DPD was submitted for examination at the end of January 2012 which was only a matter of days after the deadline set by the Council for comments in respect of the Detailed Water Cycle Study Final Report and Schedule of Proposed Changes to the DPD. This process was not robust as there was in practice no opportunity for any response by the Council or for changes to be made.

5.3 Written representations submitted by Bidwells liaising with Consultant Development Engineers M-EC have demonstrated that the issue of waste water treatment at The Deepings Waste Water Treatment Works does not lead to the conclusion arrived at by the Council in phasing sites at The Deepings. In particular there is no known finite capacity at the WwTW. It would appear the phasing is in part at least, possibly entirely, based on the Asset Management Planning Cycle by Anglian Water Services. However, AWS are able to design, cost and implement improvement works in-between the 5-year asset management programme. The final pint to be made in respect of phasing at The Deepings under Policy DE1 is that there is absolutely no justification for sites DE1a and DE1b to deliver a total of 100 dwellings prior to the year 2026 and there is no certainty over deliverability at DE1a. This site is proposed to be accessed through an active development sites which is in separate ownership, there is no direct access from the public highway.

6 Question: Is the wording of Policies DE2b and DE3 consistent? MM62

6.1 Response: Policy DE2b states that 6 hectares of employment land for B1 and B2 uses is to be provided. Any yet Policy DE3 states up to 6 hectares of land for a range of different employment uses. The wording is not consistent and it is requested that the wording under DE3 is used within DE1. This is because there is no certainty on the amount of employment land and hence should be consistently referred to as up to 6ha and there is no justification to limit the uses to B1 and B2 only.

7 Question: Are the affordable housing requirements accurate? MM62

7.1 Response: The affordable housing targets in Policy DE1 are unnecessary because the provision of affordable housing is covered in sufficient detail in Core Strategy Policy H3: Affordable Housing which is also supplemented by the Planning Obligations SPD. Policy HE3 states a target of up to 35% of the total capacity of a scheme should be affordable subject to viability and considerations of the individual development schemes. Despite this the affordable housing target in Policy DE1 does not comply because it appears as a definite 35% based on an indicative number of houses and so cannot be accurate. It is also the case that the affordable housing target appears to increase the quantum of housing from the sites.
Bidwells is the UK’s leading regional property consultancy.