You will recall that, at the closing of the Hearing sessions into the South Kesteven Site Allocations and Policies Plan I informed you that I would be undertaking site visits during the week beginning 26/11/12. I have now completed these and I feel that I should contact you to draw some matters to your attention before you start the re-consultation process on any additional Main Modifications which you intend to make to the document.

I have not seen the Main Modifications which you have been preparing and I cannot comment on them directly. However, my comments are based on the discussions which took place in the final Hearing session.

1. Gonerby Moor
I have now had the opportunity to see the Gonerby Moor location which is referred to in Policy SAP6 of the DPD and which is shown on the plan submitted by Mr Grace. I apologise that I had not previously appreciated that the policy was dealing with large areas of new employment land. This matter needs very careful consideration. I note that the Core Strategy Inspector felt that 'promoting further employment here as a strategic principle could (thus) seriously undermine the sustainable pattern of development that the spatial objectives are seeking to maintain' and that the approach would not 'properly reflect the ELR'. However, the Core Strategy Inspector was considering the issue of a 'strategic principle' and she expressed the view that to specify sizeable allocations at the Core Strategy stage would 'pre-empt proper consideration in the AAP of the mix of employment sites required to meet the needs of Grantham sustainably, whilst seriously limiting flexibility.' The matter of development in this and other locations was, therefore, left to the AAP stage.

The Council has gone through this stage now and has allocated sufficient employment sites to meet its requirements. This excludes any new allocation at Gonerby Moor. Instead it concentrates employment land provision in and around Grantham on the Southern Quadrant SUE and the Barrowby Road sites.

The Council's strategy with regard to the Gonerby Moor site is unclear. As was pointed out at the Hearing, the text in para 4.4.8 draws attention to the many benefits of the location for employment purposes and argues that it is a sustainable location. However, the policy stops short of identifying land for development. The policy states that employment-generating development will be permitted 'where it is demonstrated that
employment land allocated in the GAAP is either unavailable or unsuitable for the proposed development’. There is no clear explanation of why that limitation needs to be placed on land in a location which the Council considers to be sustainable - presumably it is to ensure that development pressure is diverted to the Council's favoured Southern Quadrant location - but also there is no explanation of the circumstances which could lead to a decision that allocated land sites elsewhere was unavailable or unsuitable or by whom that decision would be made.

The DPD contains no plan which shows the land to which Policy SAP6 refers but from discussions at the Hearing it would appear that very large areas could be involved. The 'open-ended' nature of the policy proposed by the Council could permit large amounts of development - effectively as additional provision over and above that made in the GAAP and SAAP documents. The only limitation other than traffic movement considerations would be whether the development could be accommodated without there being a detrimental effect on the open countryside. Given that the land involved is flat, open agricultural land, any development is likely to have some detrimental effect unless adequate screening is provided. In which case, with sufficient screening, any scale of development could be argued to be acceptable.

The original Representation made on the Gonerby Moor site drew particular attention to the scale of the site and its accessibility by rail as being important considerations which would justify its identification for 'special' developments in the DPD. Enhancing access by rail is given a brief mention in the policy but neither of these considerations are mentioned in the policy or text as providing special justification which would justify development in this location.

Whilst my questions at the Hearing were intended to draw out why the Gonerby Moor location was not shown as a plan location, the discussion at the Hearing raised wider issues including the need to clarify the Council's strategy with regard to the location. You may wish to give these comments consideration in preparing any Main Modifications in regard of the site.

2. Site Selection Processes
During my site visits I visited all of the designated LSCs, many of the sites which had been promoted in the LSCs, all of the sites which had been promoted for development in the LSCs which were identified to receive development and all of the 'omission sites'. The Council's site selection processes were discussed at some length in the Hearings sessions and I do not propose to comment further here on the general issues. However, there are some particular matters which I noted:

a) Site LSC1a. The Council's Evidence Document rightly points out that the site is some distance from village facilities. Nonetheless is is selected
for development ahead of site BARR02 which, it would appear, is much better located. The Council's choice does not therefore appear to be supported by the evidence base.

b) The general issue of community benefits deriving from LSC sites was raised in the Hearings. Of the 6 LSC sites identified in the DPD, 3 have identified community benefits and, according to evidence submitted to the Examination, a fourth is owned by the Parish Council. At the Hearings the Council made clear that the possibility of community benefits accruing from the development of some sites had not influenced its decision to allocate the relevant sites and I note that neither Policy LSC1 nor its associated text indicate that the granting of planning permission would be dependant on delivery of the identified community benefits. However, the Council's site selection process has taken into account the local 'appetite' for development. My concern is that this local 'appetite' for development may have been whetted by the prospect of community benefits, the provision of which the Council may not be able to insist upon. This concern was highlighted in the discussion with Billingborough Parish Council in Session 8 of the Hearings. The Parish Council's stance was that it would accept an allocation of the site of the former Aveland School buildings for housing but only if the school playing fields were turned over to community use. It may be possible that other Parish Councils have made comments on the same basis and their hopes may be falsely raised by the inclusion of reference to the community benefits in Policy LSC1.

In these circumstances the Council may wish to consider a Main Modification to clarify its position on the community benefits and to set out when it would and would not be appropriate to require delivery of these as part of the allocation.

3. You will have seen the letter from Wadlake Bell submitted on behalf of Stamford Chamber of Trade and Commerce (SCOTC). On page 3 the letter draws attention to the Manydown Co Ltd v Forest Heath DC case. You state at para 5.2.1 of your statement for Hearing Session 2 - General Housing Provision Issues that sites were drawn from a variety of sources. Have you any evidence to show that it was not only sites 'promoted' by developers which were considered?

Roland Punshon

INSPECTOR