Main Modifications to Site Allocation and Policies Plan Submission Following Examination (July 2013) | Comments

Consultee
662667 Larkfleet Limited
c/o Bidwells

Agent
462735 MR DAVID BAINBRIDGE

CommentID: 28

Main Mod Ref Number: PHMM01

Do you consider the main modification to be Legally Compliant: No
PHMM01 is listed against paragraph 1.1.4 however paragraph 1.1.3 is also subject to a proposed modification and should have its own modification reference. In the interests of clarity this response relates to paragraphs 1.1.3 and 1.1.4. PHMM01 briefly des

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared: Yes
- Justified: No
- Effective: Yes
- Consistent with National Policy: No

Please give details of why you consider the main modification is Sound/Unsound:
The DPD is not the most appropriate strategy when considered against the reasonable alternatives based on a proportionate evidence base. The supplementary evidence base underpinning the DPD is dated July 2013. This supplementary evidence base does not in proportional terms supplement an existing evidence base because it replaces the previous evidence base. There are reasonable alternatives to the site selections for the Local Service Centres (LSC) now proposed by the Council following submission and partial examination of the plan. The alternative site selections are described in the response to the section of the DPD on LSC. The DPD is not consistent with national policy because the DPD does not comply with all of the relevant core planning principles set out in the National Planning Policy Framework (the Framework). The DPD and associated documentation does not set out a clear strategy for allocating sufficient land which is suitable for development in South Kesteven. Consultation for a period of 6 weeks over the months of July and August covering 7 documents including erratum and non-technical summary which amounts to over 700 pages is not transparent or accessible. The proposed modifications amounts to a re-writing of the DPD from the version submitted for examination in January 2012.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
It is considered that the proposed modifications amount to a re-writing of the DPD and that insufficient time has been provided for consultation on such an extent of change. The evidence base prepared is in effect not supplementary but rather it is the evidence base underpinning the DPD which has already been submitted and partially examined. It is considered that this DPD as with the Grantham Area Action Plan needs to be withdrawn and for the Council to undertake a review of the Core Strategy leading towards preparation of a DPD which includes strategy, objectives, policy and site allocations. The documentation on which the Council now relies is transparent and rigorous. It is clear from the start the criteria which have been adopted both to eliminate those sites regarded as complete non-starters and then to analyse and appraise the potential opportunity sites. Both in the Strategic Environmental Assessment and also in the additional evidence which accompanies it, it is very clear to the reader how the choices which the Council have made have been reasoned and justified. The purpose of the documentation is to facilitate the debate about the merits of the assessment and conclusions, and to enable participants in the process to understand why the Council have done what they have done. The revised documentation makes this entirely clear, and from a legal perspective the documentation is considered robust. The requirement of the Planning Act in respect of the SA/SEa process have been therefore been addressed.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes
It is necessary to participate in the discussion on this matter at an examination led by the Planning Inspector.

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes
Whilst it is recognised that there are a large number of Main Modifications, many are not extensive in nature and are uncontroversial. In terms of allocations the Plan has only ever proposed allocations in some but not all Local Service Centres: this is not altered by the modifications now proposed. Modifications relating to the housing allocations in LSCs have arisen as a consequence of the SA/SEA assessment work which has addressed a number of issues raised at the examination hearings regarding transparency and consistency of approach to assessments of both LSC villages and sites, including those made by this respondent. Two of the sites subject to modifications (Harlaxton and Billingborough) were also the subject of discussion at the examination hearings. The Cogent case law establishes that the SA/SEA must be prepared in accordance with the SEA Regulations before the plan is adopted. The additional work carried out by the Council ensures that the evidence base is appropriate and fully compliant with the requirements of the SEA Regulations. This work has been undertaken prior to the closure of the examination and therefore prior to the Inspector reporting on the examination. As the same strategy in terms of allocations has been pursued, the issue is essentially whether the allocated sites are the best fit with that strategy, or alternatively the best fit with the evidence base. In light of this there has not been a significant shift in the strategy of the plan and the main modifications whilst significant are not fundamental. It should be noted that overall very few of the modifications proposed are ‘new’ arising from the SA/SEA Addendum work. Most of the modifications are changes/updates to already proposed main modifications (published in June 2012), factual updates, consequential changes arising (e.g. changes to monitoring framework) or arise from the consideration of representations at the hearing sessions in 2012.

Consultee
605225  Ms Jane Bateman

Main Mod Ref Number: PHMM01
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

I welcome the tightening up of the wording and the reference to the NPPF.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted

Consultee
261229  Welby Estate

Main Mod Ref Number: PHMM01
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared: No
- Justified: No
- Effective: No
- Consistent with National Policy: No

Please give details of why you consider the main modification is Sound/Unsound:

We do not consider the SAP DPD is in conformity with the principles of sustainable development as per the NPPF, due to reasons relating to proposed growth and distribution of housing. We do not consider the chosen areas or sites have been selected to best contribute to this objective. See Knight Frank report Section 3, Paragraphs 3.2 – 3.12

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes

As a major landowner, we consider our concerns regarding the LSCs and growth need to be debated at the Examination.

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: The housing requirements set out in the SAP DPD and their distribution are derived from the Core Strategy and were considered and tested through the Core Strategy Examination process. It is unnecessary to review the overall requirement or their distribution as part of the SAP DPD preparation process: to do so would take the SAP DPD out of conformity with the Core Strategy. The Council tabled a document (ED31) at the hearing sessions which included some suggested wording and tables showing how the SAP and GAAP together met the housing requirements of the Core Strategy. At that session there appeared to be a general consensus around the table that the proposed wording might address some of the concerns raised by the Inspector and objectors. ED31 was also made available during the hearing sessions to participants to comment on: no comments were received. PHMM07 is based on the contents of ED31 (although it has been updated to reflect the latest available housing figures (as at 31st March 2013) and to reflect the withdrawal of the GAAP). Contrary to what is stated in the representation the requirements of the Core Strategy will be exceeded by at least 800 homes through the development of allocations and sites with planning consent. See also response to respondents representation on the SA/SEA (SAPSA18).

Consultee: Ms Jane Bateman

Agent: 605225

CommentID: 17

Main Mod Ref Number: PHMM02

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared: Yes
- Justified: Yes
- Effective: Yes
- Consistent with National Policy: Yes

Please give details of why you consider the main modification is Sound/Unsound:

Again I welcome the tightening up of this section, it being more accurate and the reference to the NPPF.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Do you wish to be notified of the Inspector’s report and/or adoption of the document:

SKDC Response: Support noted
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

\[\text{Positively Prepared:} \quad \text{Justified:} \quad \text{Effective:} \quad \text{Consistent with National Policy:}\]

Please give details of why you consider the main modification is Sound/Unsound:
We object to the approach taken to the Assessment of LSCs, particularly regarding housing growth and distribution. See KF report Section 4, Paragraphs 4.4 – 4.27

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: See response to representation ID47 (PHMM01) and also response to representation on the SA/SEA (SAPSA18).

Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

\[\text{Positively Prepared:} \quad \text{Justified:} \quad \text{Effective:} \quad \text{Consistent with National Policy:}\]

Please give details of why you consider the main modification is Sound/Unsound:
I welcome the inclusion of this section to conform with the NPPF in relation to sustainable development.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:
Object - alternative LSCs and development sites have not been objectively assessed - the assessment is flawed. See Knight Frank report Section 3, Paragraphs 3.7 - 3.12

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The Council considers that the documents it has prepared are transparent and rigorous. The criteria which have been adopted both to eliminate sites regarded as complete non-starters and then to analyse and appraise the potential opportunity sites is clear from the start. Both in the Strategic Environmental Assessment, and also in the additional evidence document which accompanies it, it is very clear to the reader how the choices which the Council have made have been reasoned and justified and from a legal perspective the Council considers these documents to be robust (see also response to rep SAPSA18).

Consultee
605225 Ms Jane Bateman
Agent

Main Mod Ref Number: PHMM06
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:
I welcome the inclusion of this new section to conform with the NPPF in relation to sustainable development.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted

Consultee
662667 Larkfleet Limited
Agent
462735 MR DAVID BAINBRIDGE
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
- Positively Prepared: Yes
- Justified: Yes
- Effective: Yes
- Consistent with National Policy: No

Please give details of why you consider the main modification is Sound/Unsound:
Whilst it is considered that PHMM06 is legally compliant because it has had regard to national policy in the form of the National Planning Policy Framework (the Framework), the proposed modification does not accurately reflect the presumption in favour of sustainable development contained in paragraph 14 of the Framework and for this reason the proposed modification is not sound. The proposed modification under PHMM06 does not accurately reflect the presumption in favour of sustainable development contained in paragraph 14 of the Framework and for this reason the proposed modification is not sound. Whilst the objective behind inclusion of this proposed modification is positively prepared the inaccuracy might not deliver the objective.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
Not all development will improve the economic, social and environmental conditions in an area. Whilst these are the three dimensions of sustainable development. It is for the planning system to perform economic, social and environmental roles. The Framework requires development to be assessed against the core planning principles contained therein, it does not require development to improve economic, social and environmental conditions in an area and therefore the first paragraph of PHMM06 should be changed to accurately reflect the Framework.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes
It is necessary to participate in the discussion on this matter at an examination led by the Planning Inspector.

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The new policy is the PINs model policy for sustainable development. PINs recommend the inclusion of the model policy in all Local Plans, to ensure that the plan accords with the presumption in favour of sustainable development set out in the NPPF. It should be noted that the Council has made no change to the wording of the model policy.
Please give details of why you consider the main modification is Sound/Unsound:

PHMM07 and elsewhere in the proposed modifications refers to the Grantham Area Action Plan. An adopted or submission version DPD does not exist having been withdrawn from examination and therefore there should be acknowledgement of this fact. Table 2 Phasing of Allocated Sites fails to meet any of the tests of soundness. The phasing proposed is an arbitrary and unnecessary intention by the Council to delay residential development over the plan period contrary to paragraph 47 of the Framework. The fourth bullet point of paragraph 47 of the Framework requires local planning authorities to set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target. The arbitrary and unnecessary proposed phasing of residential development in the part of the District covered by this DPD is not a housing implementation strategy and it will not deliver a five-year supply of housing land to meet the housing target for South Kesteven District. The means by which to achieve a five-year supply of housing land is for the Council to undertake a review of the Core Strategy leading towards preparation of a DPD which includes strategy, objectives, policy and site allocations.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

It is considered that the Council should undertake a review of the Core Strategy leading towards preparation of a DPD which includes strategy, objectives, policy and site allocations. Failing this Table 2 should be omitted from the plan as it is not legally compliant and it is not sound.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector Yes

It is necessary to participate in the discussion on this matter at an examination led by the Planning Inspector.

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The matter of phasing was considered in detail at the hearing sessions. The Council tabled a document (ED31) at the hearing sessions which included some suggested wording and tables showing how the SAP and GAAP together met the housing requirements of the Core Strategy. At that session there appeared to be a general consensus around the table that the proposed wording might address some of the concerns raised by the Inspector and objectors. ED31 was also made available during the hearing sessions to participants to comment on: no comments were received. PHMM07 is based on the contents of ED31 (although it has been updated to reflect the latest available housing figures (as at 31st March 2013) and to reflect the withdrawal of the GAAP). The SAP has been prepared to be in conformity with the adopted Core Strategy. It is not considered appropriate or in the interests of delivering the objectives of the NPPF (in particular maintaining a deliverable five year housing land supply) to begin a full review of the Core Strategy at this stage. The housing requirements in the Core Strategy are based on those which have been considered and tested through the Core Strategy Examination process. It is unnecessary to review these figures as part of the DPD preparation process. The text of the plan still refers to the GAAP as the Council is continuing to work towards submitting it for Examination. The GAAP together with the SAP and Core Strategy will form the development plan for the District and it is, therefore, entirely appropriate for references to be made to the GAAP in this plan. The figures included within Table 1 for Grantham are based upon known commitment and completions and are the minimum number of homes which the GAAP will be seeking to allocate. This is made clear within the footnote (#) to Table 1 in this section of PHMM07.
Please give details of why you consider the main modification is Sound/Unsound:
I welcome the inclusion of updated and accurate figures.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
Concerns raised regarding over reliance on strategic sites (Grantham) and existing permissions across the authority. We also consider allocations should be made for a 15 year period of time as a minimum (currently not compliant with the NPPF). See Knight Frank report Paragraphs 4.4-4.27 and Paragraph 2.20

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted

Consultee
261229 Welby Estate

Agent
The Welby Estate

Main Mod Ref Number: PHMM07
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

Please give details of why you consider the main modification is Sound/Unsound:
Concerns raised regarding over reliance on strategic sites (Grantham) and existing permissions across the authority. We also consider allocations should be made for a 15 year period of time as a minimum (currently not compliant with the NPPF). See Knight Frank report Paragraphs 4.4-4.27 and Paragraph 2.20

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The housing requirement in Grantham referred to in the SAP DPD is the minimum requirement for which provision will be made in the GAAP: this will involve the identification of sites additional to the two SUEs. The SAP DPD would no longer be in conformity with the Core Strategy if it were to cover a longer period than that of the Core Strategy and currently there is no assessed housing requirement figures against which to base any allocations beyond 2026. The Plan period, housing requirement and allocations to provide for this is a matter for a Core Strategy review not this Plan.

Consultee
26208 Mr Bruce Thompson

Agent
262283 Mr Andrew Blackwell

Diploma PLC
Bidwells

Main Mod Ref Number: PHMM08
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared: Yes
- Justified: No
- Effective: No
- Consistent with National Policy: No

Please give details of why you consider the main modification is Sound/Unsound:

We have made comparisons between the July 2013 Supplementary Evidence Document, which was prepared in support of the Submission (Incorporating Modifications) consultation document, and the October 2011 Evidence Document prepared for the original Submission consultation. With reference to site RUT1, which is adjacent to the development boundary of Stamford but located entirely within the administrative area of Rutland County, the 2013 Supplementary Evidence Document confirms that large scale development of the site would: 'Not relate well to existing development and will have a significant impact upon the landscape ... major highway improvements will be required that needs input from Rutland CC ... [The site] has little relationship with existing development and little or no connection with the town centre.' This summary conclusion so starkly compares to the 2011 conclusion which says: '[The site] is considered suitable for residential and/or employment purposes. The site has been assessed as having a moderate landscape sensitivity and a medium-high capacity for development ... The western part of the site adjacent to the Great North Road will have less impact upon the landscape and highway network. However it is a large site which, if fully developed, could have a detrimental impact on the amenities of nearby residents.' The change in summary of conclusions between the two documents requires examination in detail and acknowledgement if these concerns are beyond mitigation. It is our submission that the issues set out in the 2013 evidence are unbalanced, have been overstated and insufficiently measured to imply that they are beyond mitigation. The Proposed Main Modifications are therefore inconsistent with achieving sustainable development because they would unduly deny the longer term prospect of a sustainably planned urban extension to Stamford at site RUT1.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

In order to make the Main Modification sound the site selection process for RUT1 as set out in the Supplementary Evidence Document should be amended to more fairly reflect the site's attributes so that the prospect of sustainable development is not prejudiced in the longer term.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: The SA/SEA has been undertaken using a new framework of questions as set out in the methodology. The answers to the questions show how a site is assessed. The new SA/SEA assessments have been prepared without reference to the old and are, therefore, wholly independent of any previous conclusions. The conclusions of the SA/SEA do not determine whether a site is suitable or not for development, but identify where there may be significant adverse effects of development on the objectives (and relevant receptors). As such the SA/SEA assessment concludes that there are likely to be a number of adverse effects on some objectives arising from development of this site. The full site assessment process uses the SA/SEA as on element in the decision making process. In addition to the SA/SEA, consideration is given to the comments of highways (and in this case Rutland County Council’s assessment of the site) and an assessment of the impact of the site made by development management, conservation and planning policy officers. This determined that the site allocated as STM3 would have less impact on the landscape and had a greater connectivity to the existing pattern of development and the services and facilities of the town. The assessment of the site at this time should not be seen as preventing or predetermining the consideration and assessment of any site in a future review of the plan. Mitigation is a consideration in preparing an SA/SEA, however, in determining which sites are most suitable for allocation those which require no or very little mitigation have been selected in preference to those which require more significant mitigation measures.

Consultee

261229 Welby Estate

The Welby Estate

CommentID: 56
Main Mod Ref Number: PHMM08

Do you consider the main modification to be Legally Compliant: No (you object and consider the main modification should be changed)

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

<table>
<thead>
<tr>
<th>Positively Prepared</th>
<th>Justified</th>
<th>Effective</th>
<th>Consistent with National Policy</th>
</tr>
</thead>
</table>

Please give details of why you consider the main modification is Sound/Unsound:

- SCOT believes the revised SKDC selection methodology to be just as deficient as the original. The modifications made are not a true reflection of the processes and methodologies actually utilised by the Council in its selection of sites for allocation. The outcomes have long been pre-determined. The revisions introduced to the site selection process have been engineered to provide support for those outcomes. The Council has undertaken the very "paper exercise" cautioned against by the Examination Inspector.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes

Do you wish to be notified of the Inspector’s report and/or adoption of the document: SKDC Response:

The Council tabled a document (ED31) at the hearing sessions which included some suggested wording and tables showing how the SAP and GAAP together met the housing requirements of the Core Strategy. At that session there appeared to be a general consensus around the table that the proposed wording might address some of the concerns raised by the Inspector and objectors. ED31 was also made available during the hearing sessions to participants to comment on: no comments were received. PHMM07 is based on the contents of ED31 (although it has been updated to reflect the latest available housing figures (as at 31st March 2013) and to reflect the withdrawal of the GAAP). The Five Year Housing Land Supply paper for 2013-2018 sets out an assessment of the deliverability of sites. See also response to respondents representation ID47 (PHMM01) and response to representation on the SA/SEA (SAPSA18).

Consultee: 260968 Mr Tim Lee
Stamford Chamber of Trade and Commerce

CommentID: 51
Do you wish to be notified of the Inspector’s report and/or adoption of the document:

SKDC Response: The Council considers that the documents it has prepared are transparent and rigorous. The criteria which have been adopted both to eliminate sites regarded as complete non-starters and then to analyse and appraise the potential opportunity sites is clear from the start. Both in the Strategic Environmental Assessment, and also in the additional evidence document which accompanies it, it is very clear to the reader how the choices which the Council have made have been reasoned and justified and from a legal perspective the Council considers these documents to be robust. In the note of the Exploratory Meeting the Inspector drew attention to a commentary on the case of Cogent Land LLP v Rochford DC [2013] 1 P.C.R. 2 prepared by Richard Harwood QC, in which he noted that, notwithstanding the opportunity to provide the Strategic Environmental Assessment at a later stage of the process, that it should not be a paper exercise of ex post facto justification. The application of the site selection process and the review which has been undertaken has led to real differences between the document originally produced and as modified. It is not, therefore, possible to say that the process upon which the Council has engaged has been an arid ex post facto justification of the decisions already reached. It has been an exercise undertaken with an open mind as to the outcomes, which are fully explained in the material. Changes have arisen to several of the sites allocated within the plan as a result of the revised process and it is noted that other representations refer to how differently sites have been assessed using the new methodology. The representation states that the modifications are not a true reflection of the process or methodologies used. It is unclear how or why the objector believes this to be the case, particularly as the documentation prepared clearly sets out the methodology and processes which have been followed and the conclusions arising from applying the revised methodology.

Consultee
776762 Mr Peter Burrows
Lindpet Properties Ltd

Agent
776166 Mr Matt Hubbard
Antony Aspbury Associates Ltd

CommentID: 11

Main Mod Ref Number: PHMM09
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
- Positively Prepared: No
- Justified: Yes
- Effective: No
- Consistent with National Policy: Yes

Please give details of why you consider the main modification is Sound/Unsound:
We comment in relation to paragraph 3.4.5.2 in that whilst the LPA are seeking the provision of a minimum of 438 new dwellings in the 16 LSCs, the provision of only 170 dwellings on specific sites within a limited number of those LSCs is too prescriptive and will not lead to the effective provision of housing. A more positive and effective approach would be to only identify a limited number of allocated sites and let the market dictate where the remainder of the housing provision takes place whilst accepting and ensuring that further housing could come forward on additional sites to those specified.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
A lower number of specified site should be identified as preferred sites for development at the same time as accepting that all of the LSC’s could accomodate future development as and when the market predicts in order to ensure that the minimum requirement for 170 dwellings is met within the plan period.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The plan makes sufficient provision to ensure that the housing requirements of the Core Strategy will be delivered over the plan period. It would be inappropriate not to allocate sufficient land to meet this requirement and to do so would make the SAP DPD out of conformity with the Core Strategy. Adopted Core Strategy
Policy SP1 supports the principle of the development of other suitable sites within LSCs and Policy SAP H1 of this plan sets out more detail about how proposals will be assessed. This includes four criteria against which proposals for other "windfall" sites will be considered.

Consultee
662667 Larkfleet Limited
 c/o Bidwells

Agent
462735 MR DAVID BAINBRIDGE

CommentID: 46

Main Mod Ref Number: PHMM09
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)
  If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
    Positively Prepared: Yes
    Justified: No
    Effective: No
    Consistent with National Policy: Yes

Please give details of why you consider the main modification is Sound/Unsound:
To be consistent with Policy DE3 the proposed introduction of the number of homes on a single mixed use extension allocated to the north of the town should be approximately 200.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
To be consistent with Policy DE3 the proposed introduction of the number of homes on a single mixed use extension allocated to the north of the town should be approximately 200. The proposed wording for the second bullet point should read:"Approximately 300 homes on allocated sites including approximately 200 homes on a single mixed use extension site allocated to the north of the town (Policy DE3) (Sites DE1a and DE1b have planning consent so have not been included within this figure)."

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes
It is necessary to participate in the discussion on this matter at an examination led by the Planning Inspector.

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: Agree. This would make the paragraph consistent with paragraph 4.1.2.1 relating to Stamford which use the word "about"

Consultee
407737 Mr R J C Doughty
 Robert Doughty Consultancy Ltd

Agent

CommentID: 26

Main Mod Ref Number: PHMM09
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)
  If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
    Positively Prepared: No
    Justified: Yes
    Effective: No
    Consistent with National Policy: Yes

Please give details of why you consider the main modification is Sound/Unsound:
PHMM09 - Section 3.4 Local Service Centres (LSC) now states that provision is made in this plan for the development of at least 438 new homes in the sixteen LSCs identified in the Core Strategy Policy SP2, for the period to 2026. These comprise 268 new homes on sites with planning permission at 1 April 2013, and 170 homes on sites allocated in those six villages which are considered most able to accommodate additional development. The remaining LSCs will not share the benefits that PHMM32 expects the allocation of additional housing to bring to a community, such as affordable housing, open space and play facilities.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

In Castle Bytham one of the overlooked LSCs, where the DPD fails to allocate any housing land, the objector has had three sites accepted following evaluation by the Strategic Housing Land Availability Assessment finding that land here is suitable for housing development (in particular DPD site reference CAS06, or SHLAA site reference SK/CAS/04). In addition, other land under the control of the objector (DPD site references CAS07 and CAS08) should be considered for allocation by the DPD to enable Castle Bytham to develop equally with the other LSCs. The alternative is diminishing services and early decline into a dormitory village.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The modifications at PHMM07 provide the detail of how the Core Strategy housing requirements are to be met through the provisions of this plan. Although the housing figures have been updated the modification does not propose an increase to the housing requirements set out in the Core Strategy. The sites referenced in this representation have been assessed as part of the preparation of both the submission plan and through the Addendum SA/SEAs. The evidence included in the SA/SEA clearly shows that Castle Bytham does not perform as well as other LSCs and is not, therefore, identified as a Tier 1 or Tier 2 village. As such, it would be inappropriate to allocate a site within this village.

Consultee
408627 Mrs A Woods
Stamford Bypass Group

Main Mod Ref Number: PHMM09

Do you consider the main modification to be Legally Compliant: 

Do you consider the main modification to be Sound:

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

Positively Prepared: Justified: Effective: Consistent with National Policy: 

Please give details of why you consider the main modification is Sound/Unsound:

Stamford Bypass Group are concerned about the lack of clarity of Housing Needs for Stamford as set out in para 4.1.9. The figures despite the addition of sites in Uffington Road, Belvoir Close and Kettering Road do not tally. It is therefore misleading.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The changes to paragraph 4.1.9 simply update the completions and commitments figures for Stamford to 31st March 2013. Only one change to the housing allocations is proposed in Stamford: the extension of the Kettering Road site to include land to the west, which has increased the indicative capacity of the site to 50 homes rather than 30. This change is reflected in paragraph 4.1.2.1 which shows how the remaining housing requirement for Stamford for the period to 2026
will be made up of allocations which will provide 530 additional homes. Together the completions, commitments and allocations will provide 123 more homes than the Core Strategy requirement for the town if they are all built. However it is recognised that not all of the sites with consent will be delivered and therefore some flexibility has been provided to ensure that the Core Strategy requirement is actually delivered.

Consultee  
261229 Welby Estate  
The Welby Estate

CommentID: 57

Main Mod Ref Number: PHMM09
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)
If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Concerns raised as no evidence base has been prepared to demonstrate extant permissions and likely deliverability. See Knight Frank report paragraph 3.8

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes
Do you wish to be notified of the Inspector's report and/or adoption of the document: 

SKDC Response: Information in the SAP DPD on housing completions and commitments has been updated to reflect the position as at the 31st March 2013. This updated information has been published in the Five Year Housing Land Supply paper for 2013-2018.

Consultee  
605225 Ms Jane Bateman

CommentID: 21

Main Mod Ref Number: PHMM09
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound:
If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

I welcome the inclusion of updated and accurate figures for Stamford.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes
Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes
Do you consider the main modification to be Legally Compliant:

Do you consider the main modification to be Sound:

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

I am pleased to see the inclusion of this urban development. However, I am disappointed that there is no reference to public transport. The reference to the site being "adjacent to the A1 makes it highly suitable and attractive to the employment market" is also disappointing as this implies that road travel is key.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Do you wish to be notified of the Inspector’s report and/or adoption of the document

SKDC Response: Support for the allocation is noted. In reference to the representors concern that there is no reference to public transport serving the site attention is drawn to the previous modification proposed to the allocation Policy STM3 (SAPMM17) which refers to the need for a development proposal to include a travel plan which should explore sustainable travel measures. It should also be noted that the site assessment process considered the proximity of sites to bus stops and whether the bus route serving the stop was frequent (hourly or less) or regular 1-3 hourly. This site is located within 400m of a bus stop which is served by a frequent bus service to Stamford town centre, Peterborough and Oakham.
Do you wish to be notified of the Inspector’s report and/or adoption of the document:   Yes

SKDC Response:   Support noted

Consultee  
778031   Voice of Stamford

CommentID:  48

Main Mod Ref Number:   PHMM14

Do you consider the main modification to be Legally Compliant:   Yes
Do you consider the main modification to be Sound:   No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

<table>
<thead>
<tr>
<th>Positively Prepared:</th>
<th>Justified:</th>
<th>Effective:</th>
<th>Consistent with National Policy:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

Please give details of why you consider the main modification is Sound/Unsound:
I object to the proposed allocation of Site ADD42 on the grounds that its development will make impossible the construction of the Wothorpe section of a Stamford Ring Road. The proposed allocation does not accord with Paragraphs 3.3.7 and 3.3.8 of the adopted Core Strategy.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Do you wish to be notified of the Inspector’s report and/or adoption of the document:   Yes

SKDC Response:   There is no commitment to the provision of a ring road for Stamford and therefore there is no definitive route. The route promoted by the Chamber of Trade - shown in Appendix A2 of SCOT’s representation to the submission plan (Rep no.SASub100) skirts the southern edge of the enlarged site allocated as STM1a. Development of this allocated site should not prevent any route following the edge of the development at this point. It should be noted that this section of the SCOT Ring Road passes through Peterborough City Council’s administrative area. They have not raised any concern about the actual area of land allocated, their concern relates to the indicative capacity.

Consultee  
597902   Mr Harjinder Kumar
Peterborough City Council

CommentID:  10

Main Mod Ref Number:   PHMM14

Do you consider the main modification to be Legally Compliant:   Yes
Do you consider the main modification to be Sound:   No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

<table>
<thead>
<tr>
<th>Positively Prepared:</th>
<th>Justified:</th>
<th>Effective:</th>
<th>Consistent with National Policy:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

Please give details of why you consider the main modification is Sound/Unsound:
Peterborough City Council objects to proposed modification PHMM14, concerning the allocation of a revised site at Kettering Road, Stamford (site STM1a). We consider that
the modification is not sound, as it is not justified or consistent with national policy. We do not oppose the actual allocation of the site for residential development, but are opposed to the figure of 50 for the indicative number of houses for this site. The site (as enlarged) covers an area of 1.57 hectares, and now extends to within a few metres of the South Kesteven/Peterborough local authority boundary. In a site of this size, space will be needed for an access road, visibility splays to the A43 Kettering Road, sustainable drainage systems and open space, and it is reasonable to assume that around 85% of the site will comprise the net developable area. This amounts to approximately 1.33 hectares. If 50 dwellings were built here, the net residential density would be in excess of 37 dwellings per hectare. The site is in a highly sensitive location, immediately adjoining the Stamford Conservation Area and highly visible from the rising ground to the south and south-west, which comprises open countryside within the local authority area of Peterborough. The view from the old London Road entry into Stamford from the south is one of the truly classic vistas of historic Stamford. Development at a net residential density of 37 dwellings per hectare would produce a very dense urban form with little, if any, scope for planting or screening to assimilate the development into its landscape setting. Development at such a density would be unlikely to preserve or enhance the setting of the heritage asset that is Stamford Conservation Area, contrary to the National Planning Policy Framework. We appreciate that the figure of 50 dwellings is ‘indicative’ but neither the policy nor the accompanying text explain what this means. There is no doubt that developers will interpret this as giving an ‘indication’ of what would be acceptable to the local planning authority; indeed, as it is only indicative, a developer may well come forward with a scheme for an even greater number of dwellings. In our opinion, development of this site must enable (and require) new hedgerow and tree planting to create a well designed margin to the town, and must avoid extensive areas of walls and roofs when viewed from the countryside nearby. A net residential density of around 20 dwellings per hectare would enable this, and would be far more appropriate for such a sensitive location. This would enable around 27 dwellings to be built here, and we suggest this should be the ‘indicative’ figure, instead of 50. The affordable housing target would need to be adjusted accordingly.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

We suggest the “indicative” figure should be 27, instead of 50.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The proposed modification increases the area of a site which had been allocated in the Submission plan. That smaller site had an indicative capacity of 30 homes (this would have been a development density of 37 dwellings to the hectare). No representation was made about the smaller site by the City Council at Submission stage. It is recognised that the modified allocation does extend the developable area further into the countryside and will, therefore, have a greater impact on the approach to Stamford than the original smaller site. A lower development density of 33 per hectare was applied to the enlarged site and it is considered that a careful design and layout of the site could deliver in the region of 50 homes without having a detrimental effect on the landscape. A comparable example is the approved redevelopment of the Stamford FC ground on the northern side of Kettering Road, which has a scheme density of 36 dwellings to the hectare.
Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: The policy makes clear that the extended site should be served by a single point of access. This is based upon the advice of Lincolnshire County Highways who took part in the hearing session which considered the extension to the allocation. At that session it was concluded that a larger site could be satisfactorily accessed with some off site junction improvements in the High Street/St Martins area.

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
</tr>
</thead>
<tbody>
<tr>
<td>549651 Mr William Strain</td>
<td>607499 Mr Raymond F Kilsby</td>
</tr>
</tbody>
</table>

Consultee 408627 Mrs A Woods
Stamford Bypass Group

| CommentID: 6 |

Main Mod Ref Number: PHMM14
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:
Our Clients: 1. Welcome the enlargement and western extension of residential allocation STM1a to embrace their ownership. 2. Also welcome the confirmation that this provides that residential development of their site is fully and wholly acceptable in planning principle. 3. Recognise that highway and traffic engineering considerations dictate that this allocation should be served from Kettering Road by a single access. 4. Note that the "Indicative number of houses" is stated as 50, whereas paragraph 1.6 of this Practice's Planning Statement dated 15th November, 2011 (which is before the Inspector) quotes a comparable figure of 55. 5. Observe the provision that this allocation should contribute to the housing supply over the period 2011 to 2016. 6. Acknowledge that the deliverability of this allocation will fall to be considered by the Inspector within the context of the tests and terms of notes 11 and 12 at the foot of page 12 of the National Planning Policy Framework, in the light of which our Clients and ourselves have every confidence and expectation that development of the land is viable, and that the site can and will be available for housing development over the period anticipated.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted
Do you consider the main modification to be Legally Compliant:  

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared: 
- Justified: 
- Effective: Yes
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

Concerned about the extended site as an extra additional 800 daily vehicular movements in an area that experiences acute early morning congestion. The geometry of Kettering Road meeting High Street St martins opposite Stamford High School, jeopardises the safety of pedestrians specially school children. The sites proximity to Stamford Junior school is another cause for concern. Lincolnshire County Council will not only need to look into traffic management, but also consider other component of infrastructure facilities.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The policy makes clear that the extended site should be served by a single point of access. This is based upon the advice of Lincolnshire County Highways who took part in the hearing session which considered the extension to the allocation. At that session it was concluded that a larger site could be satisfactorily accessed with some off site junction improvements in the High Street/St Martins area. 800 daily vehicular movements is in excess of that which would normally be expected from a 50 house development.
cross the first field and one the second. Both these paths are in use daily by many people, either for leisure walking or journeying to Wothorpe.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: The policy makes clear that the extended site should be served by a single point of access. This is based upon the advice of Lincolnshire County Highways who took part in the hearing session which considered the extension to the allocation. At that session it was concluded that a larger site could be satisfactorily accessed with some off site junction improvements in the High Street/St Martins area. This highway advice has been given in the context of the approved development of the football ground site. The highway authority is satisfied, therefore, that both sites can be adequately accessed. Whilst some diversion of the existing routes may be necessary as part of the development it is expected that the actual right of way will be retained.

Consultee 26365 Mrs P Stuart-Mogg
Stamford Town Council

Main Mod Ref Number: PHMM14

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

Please give details of why you consider the main modification is Sound/Unsound:

Town Council objects strongly to this increase because of the additional amount of traffic it will result along an already very busy road, particularly at peak times. The Town Council believe that a 40% increase in housing, and therefore traffic, is unacceptable in this town centre site.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: At the examination hearing session which considered the extension of the allocation it was concluded that a larger site could be satisfactorily accessed with some off site junction improvements in the High Street/St Martins area. This highway advice has been given in the context of the approved development of the football ground site. The highway authority is satisfied, therefore, that both sites can be adequately accessed.

Consultee 372928 Mr Tom Gilbert-Wooldridge
English Heritage

CommentID: 33
We note that this proposed modification involves amendments to Site STM1a (Land adjacent to Kettering Road in Stamford). It consists of enlarging the site to include the field to the west (as shown on the July 2013 revision of the Policies Map) and increasing the indicative number of houses from 30 to 50. In our original representation to the Submission DPD in November 2011 (Comment ID SASub58), we raised concerns regarding this site (and Site STM1d) in terms of its sensitive location on the edge of Stamford. We considered that the DPD was unsound because it did not contain criteria to guide development proposals (unlike Site STM1e in Policy STM3). We sought changes to the DPD that referred to the need to preserve and enhance the setting of Stamford and its conservation area, arguing that the DPD was not effective otherwise. The proposed modification to Site STM1a, without our requested changes, only serves to increase our concerns about the impact of developing this site on the setting of Stamford and its heritage assets. The site forms part of the approach into the town along two roads, the A43 (Kettering Road) and the B1081 (London Road and Old Great North Road). In many respects, it is the approach along the B1081 that is most sensitive, as one travels north along a rural road with the Grade II* registered Burghley Park to the east and open countryside to the west. The urban edge of Stamford begins immediately with the conservation area at High Street St Martin’s; there is no modern development adjoining the road unlike most of the other main approaches to the town. The approach on the B1081 therefore contributes to the significance of both Burghley Park and the conservation area. It provides a rural backdrop to the western edge of Burghley Park, and allows for a dramatic sense of arrival into the conservation area, as one goes from a rural landscape immediately into the historic town centre with its many listed buildings (we made reference to this attractive transition in our hearing statement for Session 4, in relation to potential new road infrastructure – see paragraph 2.7). There are clear views of the southern edge of the site from the B1081, including from the western entrance into Burghley Park by the Grade II listed gates, arches and lodges. Development along this part of the site allocation would result in the encroachment of Stamford into the countryside. Given that the countryside in this location contributes to the significance of Burghley Park and the conservation area, development here is likely to result in harm. The rural backdrop to Burghley Park would be eroded, whilst the dramatic sense of arrival into the historic town at High Street St Martin’s would be diminished by views of modern development. The approach along the A43 is arguably less sensitive, although the site provides a stretch of green space along the road up to the edge of the conservation area at Wothorpe Road and offers views up to the village of Wothorpe to the south. The Grade II listed almshouses known as Fryers’ Callis lie opposite the north-east corner of the site. There are also issues of traffic congestion along the A43 towards the junction with High Street St Martin’s which is detrimental to the conservation area. We accept that there have been modern interventions along this part of the A43 in the form of buildings and playing fields for Stamford Endowed Schools and the grounds of Stamford Football Club, and note that planning permission has been granted for residential development on the existing football ground (Site STM1d). In this respect, development of Site STM1a along its northern half nearest to the A43 frontage is likely to be less harmful to the historic environment than development towards the southern half closest to the B1081. Increasing the area of Site STM1a and the indicative number of houses potentially exacerbates the impact on the setting of Stamford and its heritage assets by enlarging the amount of residential development that would take place on this edge of the town. The rural backdrop to Burghley Park and the sense of arrival into the conservation area from the B1081 could be further reduced. Although the modifications may not result in a significant change in overall density, there could be more housing over a wider area. We accept that to some extent that any impact on heritage assets will depend on the masterplanning of the site include landscaping, building heights and architectural design. Whilst this can be left to the application stage, greater clarity in this DPD is essential. We consider the proposed modification is unsound for two reasons; firstly we are not convinced that the enlarged site and additional number of houses is justified or effective, and secondly, we continue to maintain that the DPD needs clearer guidance over the heritage issues any development proposal would have to address in order to be effective and consistent with national policy (NPPF). In terms of the first reason, the enlarged site appears to be justified in terms of access issues, but otherwise it is not clear why this site is suitable for an additional amount of housing. This raises concerns about the effectiveness of the DPD and the deliverability of the enlarged site in terms of its impact on heritage and landscape matters. The revised Sustainability Appraisal (Appendix 6) and supplementary Evidence Document (Appendix 2) for the site and Policy STM1 do not appear to fully consider impact on heritage assets other than archaeology. We would welcome greater clarity from the Council on these matters to address these issues of unsoundness. In terms of the second reason,
we feel that clearer guidance is essential to help inform development in this sensitive location. As noted above, the site is particularly sensitive along its southern edge in terms of impact on heritage assets and the setting of Stamford. Regardless of whether the site remains at its original size or is enlarged as proposed, the DPD should state that development of the site should preserve and enhance the setting of Stamford and nearby heritage assets, particularly along its southern boundary. It is not enough to leave it to Policy EN1 of the Core Strategy, as this policy only provides broad requirements relating to the historic environment. Specific wording in the DPD would emphasise the importance of the issue to this site and provide greater clarity and guidance. It would address concerns regarding the effectiveness and deliverability of the DPD in terms of heritage issues and be consistent with national policy. Paragraph 17 of the NPPF requires plan-making to conserve heritage assets a core planning principle. Paragraph 152 requires local plans to avoid adverse impacts on the environment, using mitigation measures where impacts are unavoidable. The fifth bullet point of Paragraph 157 requires sufficient detail to be provided with site allocations.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

In order to make the DPD sound, we require further explanation from the Council with regards to the justification and effectiveness of the proposed modification in terms of heritage and landscape impacts. We also require additional wording with Policy STM1 in relation to Site STM1a, which could be along the following lines: “Development of this site should preserve and enhance the setting of Stamford and nearby heritage assets, particularly along its southern boundary.”

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

No

Do you wish to be notified of the Inspector’s report and/or adoption of the document:

Yes

SKDC Response:

In response to English Heritage's previous representation about the smaller site allocated (SASub58) the Council considered that it was “not necessary to include additional criteria, as all development must also accord with other policies. Core Strategy Policy EN1 requires consideration of environmental, heritage and landscape factors”. Whilst this response is still relevant it is recognised that English Heritage's concerns about the potential impact the increased allocation may have on this approach to Stamford is similar to that expressed by Peterborough City Council. The suggested wording indicated in the representation may therefore provide some additional clarity to developers about what is expected of a development in this location but it is not considered necessary to change the indicative capacity of the site shown in the policy.
Do you wish to be notified of the Inspector’s report and/or adoption of the document:

SKDC Response: There is no commitment to the provision of a ring road for Stamford and therefore there is no definitive route. The route promoted by the Chamber of Trade - shown in Appendix A2 of SCOT’s representation to the submission plan (Rep no.SASub100) skirts the southern edge of the enlarged site allocated as STM1a. Development of this allocated site should not prevent any route following the edge of the development at this point. It should be noted that this section of the SCOT Ring Road passes through Peterborough City Council’s administrative area. They have not raised any concern about the actual area of land allocated, their concern relates to the indicative capacity.

Consultee
372928  Mr Tom Gilbert-Wooldridge
English Heritage
CommentID: 34

Main Mod Ref Number: PHMM15
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)
If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

Positively Prepared:  Justified:  Effective:  Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:
We note this allocation involves an additional employment site on land to the east of Ryhall Road. Although this site forms part of the wider 'Newstead' site and part of STAM14, we note that it is the least sensitive part of that wider site according to the Landscape Sensitivity and Capacity Study from 2011. Given the topography of this site, it would appear that there would not be any visual impact on Burghley House and Park to the south and no impact on any other designated heritage asset.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Comments noted

Consultee
408627  Mrs A Woods
Stamford Bypass Group
CommentID: 4

Main Mod Ref Number: PHMM15
Do you consider the main modification to be Legally Compliant:
Do you consider the main modification to be Sound: Yes (you support the main modification)
If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
Please give details of why you consider the main modification is Sound/Unsound:

We note that of the 12 hectares, only 3 hectares is being considered for industrial development at present, however it is stated that the majority of this land will receive industrial development permission at a later date. Since the designated land traffic generation will be in the region of 1500 vehicular movements per day, if more is allocated for industry, traffic management will become essential condition of development if a link road from Uffington Road to Ryhall Road serving this area is established. We however consider the goods produced may want to reach the A1, it may be essential to safeguard the West Bypass/Relief road route to alleviate traffic congestion. We have in principle no objection to the industrial development, only to the traffic generation on neighbouring houses in Ryhall Road.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Do you wish to be notified of the Inspector’s report and/or adoption of the document

SKDC Response: It is not entirely clear what statement this response refers to. The modification proposes the allocation of 3 ha of land to the east of the former Mirlees Blackstone Foundry and to the rear of existing employment development north of Uffington Road for general employment development in use classes B1 and B2. There is no reference in the plan to the site being made any larger at a later date or to it being used for a mixed development. Indeed the assessment of the larger site (of which the allocated 3 ha is a part) clearly identifies a number of constraints and significant impacts arising from its development (including flood risk, impact on landscape and access). In respect of any concerns about traffic arising from development of the 3 ha for employment uses, the allocation (STM2d) is caveated by a highway restriction which is clearly stated in the policy as part of the modification (PHMM15).

Consultee
260968 Mr Tim Lee
Stamford Chamber of Trade and Commerce

Main Mod Ref Number: PHMM15
Do you consider the main modification to be Legally Compliant: No (you object and consider the main modification should be changed)
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

Please give details of why you consider the main modification is Sound/Unsound:

Proposed SAP Policies STM2 and SAP5 designate much of the lands for employment use, asserting that they form part of a locally important existing employment site. The SAP assessment of lands towards and on the Eastern side of Stamford which are designated as, are, or have been, employment areas, expresses concerns that they are poorly located to the strategic highway network and/or the historic town centre. As such they may be less attractive market. In contrast, greenfield land on the Western edge of the town is said to be attractive to the employment market due to its proximity to the A1 Trunk Road. In formulating its latest SAP proposals, the Council has failed to investigate and then balance the need to provide suitable new/replacement employment sites with SAP Objective 8 requirement to prioritise well located previously developed sites for sustainable housing developments. The revised site assessment and selection process is therefore defective.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Do you wish to be notified of the Inspector’s report and/or adoption of the document:
SKDC Response: Objective 8 of the SAP refers to all development it does not specify housing development. Thus the allocation of site STM2d for employment development and the allocation of STM1c for a mixed use development, on two brownfield sites, is wholly in accordance with this objective. In addition the allocation of these sites and the identification of site EXE S3 to be retained in employment use fully accord with Objectives 3 and 4 of the plan which seek to identify a range of suitable and available sites to support a diversity of new and existing employers and to restrict the loss of existing viable and well located employment land to other non-employment generating uses. The sites allocated as STM2d and EXE S3 are located immediately adjacent to the existing centres of commercial and employment development in the town. ExE S3 comprises a number of single large floorspace buildings in or suitable for employment uses. STM2d lies to the rear of this site and the employment and commercial uses which operate from land to the east of Ryhall Road. Although these sites are not well located to the strategic highway they do provide a useful source of existing and potential employment space for smaller local employers, who have less need for excellent proximity and visibility to the strategic highway network. It should be noted that the site STM2d is part of a larger site assessed as STAM14. Representation was made by Savills (on behalf of PricewaterhouseCoopers LLP (PwC) the administrative receivers of FH Gilman and Co) to the submission plan (SASub224) that the allocation of this site should be retained for employment uses or some other higher value use. In addition, representation SASub223 (also submitted by Savills) supported the principle of the identification of EXE S3 as an existing employment site. These representations were considered at examination hearing session 3 held in 2012.

Consultee
605225 Ms Jane Bateman

CommentID: 25

Main Mod Ref Number: PHMM16

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: Support noted

Consultee
26365 Mrs P Stuart-Mogg
Stamford Town Council

CommentID: 61

Main Mod Ref Number: PHMM16

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)
If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

The Town Council agrees with the previous statements that B1 and B2 employment is suitable for this area; however, we are adamant that there should be no B8 development in this area. The closeness of the A1 makes this potentially attractive to developers, however, it would be inappropriate for the entry into Stamford and for the views from the centre of Stamford towards the A1.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Comments noted. However, neither Policy STM3 or Policy STM2c (employment allocations) suggest B8 as a proposed employment use on this site. The proposed modification provides clarification as to the circumstances in which a smaller area of employment land than that proposed in the policies would be considered: it is unlikely that a B8 use would meet these criteria.

Consultee Agent
524547 Mr John Allen 524539 Mr Mike Newton
Commercial Estates Group Boyer Planning

CommentID: 41

Main Mod Ref Number: PHMM16

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

We support the amendments to Policy STM3 which concern the 14 hectares of employment land. Amendments to the effect that a lesser provision than 14 hectares will be considered, as will alternative uses to B1 and B2, are welcomed. This approach introduces a degree of flexibility which is consistent with paragraph 21 of the NPPF, requiring policies to be sufficiently flexible to allow a rapid change to economic circumstances. Furthermore it is now in compliance with the Core Strategy which, at paragraph 6.1.6 states that allocated employment land encompasses all types of employment generating development.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted

Consultee Agent
26365 Mrs P Stuart-Mogg
Stamford Town Council
CommentID: 52

Main Mod Ref Number: PHMM16

Do you consider the main modification to be Legally Compliant: No (you object and consider the main modification should be changed)

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:
The Town Council is unsure why this was apparently added to the revised document but then crossed out. We believe this is an essential element of all housing.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector's report and/or adoption of the document:

SKDC Response: The final bullet point in the policy relates to matters which are required by Building Regulations and which can be controlled through Policy EN4 of the Core Strategy. The Council agreed to remove this bullet point from the policy as a result of representations considered at examination hearing session 4 held in November 2012.

Consultee
26154  Mrs N Jacobs
Bourne Town Council

CommentID: 2

Main Mod Ref Number: PHMM17

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

Bourne Town Council gratefully accepts the increase of the site in the East of Bourne as there is a need for further employment opportunities.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: Comments noted.

Consultee
26154  Mrs N Jacobs
Bourne Town Council
CommentID: 1

Main Mod Ref Number: PHMM18

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following tests of soundness does your comment relate to:
- Positively Prepared: No
- Justified: No
- Effective: No
- Consistent with National Policy: No

Please give details of why you consider the main modification is Sound/Unsound:

Bourne Town Council objects to the reduction of the commercial site in the West of Bourne as no further residential properties are required.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector.

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: The alteration to the site area is to correctly reflect the site which has planning consent for employment development as part of the Elsea Park development. The remaining area already has planning consent as part of the Elsea Park development for housing, therefore, the change will not result in any additional houses.

Consultee
662667  Larkfleet Limited
c/o Bidwells

Agent
462735  MR DAVID BAINBRIDGE

CommentID: 31

Main Mod Ref Number: PHMM22

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following tests of soundness does your comment relate to:
- Positively Prepared: No
- Justified: No
- Effective: Yes
- Consistent with National Policy: Yes

Please give details of why you consider the main modification is Sound/Unsound:

It was accepted by the Council during the examination hearings that a more recent employment land study identified need for less than the 23 hectares of employment at The Deepings identified under Policy E1 of the Core Strategy. From recollection the figure was stated as 15 hectares. Policy DE2a identifies an area of 14 hectares for extension to Northfields Industrial Estate. Therefore there will be an overprovision of proposed employment land as a result of Policy DE2a and Policy DE2b (DE3) being 20 hectares of employment land. Market Deeping Town Council and attendees at a public exhibition of plans held on 9 July 2013 expressed their concerns not to have industrial development along Peterborough Road because they would rather a gateway-quality development which might comprise a mix of residential institutions, non-residential institutions and assembly and leisure uses. These all generate employment opportunities. There is no target in the Core Strategy or this DPD for net job creation and therefore there is no policy justification for inclusion of the requirement of the Council for a smaller area of employment and/or other employment generating uses generating a greater number of jobs than typical employment gains associated with B1 and B2.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

There is no evidence in support of the Council's requirement for 6 hectares of employment land under Policy DE2b (DE3) and so this should be amended to reflect the evidence
base. There is no policy support for the requirement of the Council for a smaller area of employment and/or other employment generating uses generating a greater number of jobs than typical employment gains associated with B1 and B2 and so this should be omitted.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes

It is necessary to participate in the discussion on this matter at an examination led by the Planning Inspector.

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response:

The Core Strategy establishes a requirement for 23 ha of employment land in the Deepings. However, the more recent NLP Employment Land Capacity Study (2010) suggests that 15 ha of employment land should be sufficient to meet the needs of the Deepings over the plan period. The effect of this study has been taken into consideration by the Council and two sites are allocated which could provide a total of 20 ha rather than 23 ha (Policy DE2). Clarification of this approach is provided by the inclusion of additional text to para 4.3.10 (PHMM20). It is also taken into account by the proposed modifications (PHMM22 and PHMM23) to the employment part of the urban extension (DE3) where nominally 6 ha of employment land is included. The modifications, however, allow for a smaller area of employment land to be provided on the site where it can be clearly justified. This approach introduces a degree of flexibility which is consistent with paragraph 21 of the NPPF, requiring policies to be sufficiently flexible to allow a rapid change to economic circumstances. It is not entirely clear from the representation whether they object to the proposed modification to allow a smaller amount of employment land to come forward on the site (allocated as DE3).

Consultee: Larkfleet Limited

Agent: MR DAVID BAINBRIDGE

c/o Bidwells

CommentID: 32

Main Mod Ref Number: PHMM23

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared: No
- Justified: No
- Effective: Yes
- Consistent with National Policy: Yes

Please give details of why you consider the main modification is Sound/Unsound:

As per the response to proposed modification of PHMM07 there is no justification for the proposed phasing of residential development into 5 year periods. Policy DE2a identifies an area of 14 hectares for extension to Northfields Industrial Estate. Therefore there will be an overprovision of proposed employment land as a result of Policy DE3 being 20 hectares of employment land. Market Deeping Town Council and attendees at a public exhibition of plans held on 9 July 2013 expressed their concerns not to have industrial development along Peterborough Road because they would rather a gateway-quality development which might comprise a mix of residential institutions, non-residential institutions and assembly and leisure uses. These all generate employment opportunities. There is no target in the Core Strategy or this DPD for net job creation and therefore there is no policy justification for inclusion of the requirement of the Council for a smaller area of employment and/or other employment generating uses generating a greater number of jobs than typical employment gains associated with B1 and B2. Core Strategy Policy H3 includes a target of up to 35% of the total capacity of a scheme to be affordable. The proposed inclusion of 35% does not comply with Policy H3.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

There is no justification for the proposed phasing of residential development into 5 year periods and so this should be omitted. There is no evidence in support of the Council's requirement for 6 hectares of employment land under Policy DE3 and so this should be amended to reflect the evidence base. There is no policy support for the requirement of the Council for a smaller area of employment and/or other employment generating uses generating a greater number of jobs than typical employment gains associated with...
B1 and B2 and so this should be omitted. The reference to affordable housing should state 'up to 35% affordable housing' to comply with Core Strategy Policy H3.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  Yes

It is necessary to participate in the discussion on this matter at an examination led by the Planning Inspector.

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: See response to representations ID30 (PHMM01) regarding phasing and ID31 (PHMM22) regarding the employment land requirement on the site. Policy H3 of the Core Strategy requires up to 35% of housing sites to be affordable. This policy was prepared in the context of the Level 2 Affordable Housing Viability Assessment which considered the viability of different types of sites in different parts of the District. Policy H3 also states that the Council will have regard to the overall viability of individual schemes. This matter was discussed at the hearing sessions held in November. The consensus at this session was that a revision to the housing allocation policies referring to the 35% requirement would clarify that the affordable housing target for each site was indicative and would actually depend upon the actual capacity of a site when a housing proposal was made. All new allocated sites are expected to deliver the full 35% affordable housing - this requirement has been in place since 2010 and it is expected that developers will take the requirement into account in negotiating the land value of allocated sites prior to submitting an application. In exceptional circumstances, because of specific site related constraints, it may be that a site which is allocated may not be viable with the full 35% affordable housing. It is expected that this will be demonstrated as part of the planning application for an individual site. The policy should however explicitly state that the full 35% is expected to be delivered.

Consultee  
261229 Welby Estate  
The Welby Estate

CommentID: S8

Main Mod Ref Number: PHMM25

Do you consider the main modification to be Legally Compliant: No (you object and consider the main modification should be changed)

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

Positively Prepared: Justified: Effective: Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

Object - the assessment has not been undertaken objectively, for example the impact on Heritage Assets has not been assessed for all LSCs. The results of the Tiered Assessment are factually incorrect in relation to Harlaxton. There does not appear to be an assessment of housing market demand; this is crucial in establishing the likely deliverability of sites - our own market research indicated strong demand for Harlaxton. Market demand should be a key criteria. See Knight Frank report Paragraphs 3.7-3.12, 4.4-4.27 and Section 5, paragraphs 5.2-5.8

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  Yes

Do you wish to be notified of the Inspector's report and/or adoption of the document:

SKDC Response: See response to representation on the SA/SEA (SAP SA18). Deliverability of sites formed part of the site assessment process (as set out in the updated Evidence document). Many places in the District are considered desirable places to live with a strong demand for available properties but that does not mean that such market demand should override the environmental/sustainable impacts of development in those villages or on particular sites.
Consultee: Mr Alan Hubbard
Agent: The National Trust

CommentID: 42

Main Mod Ref Number: PHMM26

Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

This is a necessary addition to the Site Allocations DPD as Great Gonerby is within the identified wider setting of Belton House. Whilst development can potentially be accommodated on the site it will be necessary for its form, massing and detailed treatments (including to its boundaries) to have required to the impacts upon the setting of Belton, especially its visual setting. This addition is also considered to be necessary to ensure consistency with Para 4.1.13 and related Policy EN1 of the Adopted Core Strategy.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: Support noted

Consultee: Mr Tom Gilbert-Wooldridge
Agent: English Heritage

CommentID: 35

Main Mod Ref Number: PHMM26

Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

We welcome the proposed additional wording in this paragraph relating to Site LSC1d in Great Gonnerby and the need to consider the impact on the setting of Belton House and Park. However, it is not clear why the change has been made to the supporting text rather than Policy LSC1, as it would make it a stronger requirement if stated in the policy itself.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes
SKDC Response: Support for the wording is noted. Any planning proposals should be considered against all the relevant policies from this plan and the Core Strategy. In this context it is considered inappropriate to cross reference specific policies within the allocating policy. Doing this would imply a priority to the cross referenced policy above other policies which might also be relevant to the consideration of a specific scheme. Referencing Policy SAP11 in the text flags it up to ensure that any prospective developer of the site has regard to the requirements of the policy in preparing a planning application.

Consultee
776762 Mr Peter Burrows
Lindpet Properties Ltd

Agent
776166 Mr Matt Hubbard
Antony Aspbury Associates Ltd

Main Mod Ref Number: PHMM28
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
- Positively Prepared: No
- Justified: No
- Effective: Yes
- Consistent with National Policy: Yes

Please give details of why you consider the main modification is Sound/Unsound:
Our development site at Grimers Transport has been included within the SHLAA submissions since 2011 and the LPA's assessment of the site has always indicated that the site is suitable for development as it is not only available and viable, but there are potential community benefits and good access to amenities and public transport. The LPA considered that the timeframe for the phasing of the development of the Grimers site would be 2011 to 2016. The LPA are now showing the Aveland school site as their preferred and allocated site within the village. The Aveland school site was not identified in the 2011 SHLAA. The Aveland school site did surface in the 2012 SHLAA with a phasing for 2015 to 2020 - the Grimers site remained the same. This status was repeated in the 2013 SHLAA (July 2013) yet the Main Modifications Submission now shows the Aveland school as a preferred/allocated site for development within the village. This modification comes as a surprise as the Grimers site was clearly 'in the driving seat' for future development in July 2013 (only last month) yet has simply been swept aside by the Aveland school site, largely for political reasons. There is a clear drive to promote the school site over our site due to the community benefit that the retention and re-use of the playing fields will bring forwards. We would remind the Inspector that the LPA accepted that our site could bring forward potential community benefits which, when considered with the visual benefit of the removal of the large industrial buildings, the omission of HGV traffic from the centre of the village and the fact that the Grimers site is more centrally located and, therefore sustainable, it remains our argument that the overall benefits in the development of our site outweigh those that can be apportioned to the development of the Aveland school site.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
In our opinion the LPA should not have jumped to so quickly support the development of the Aveland school site. The LPA should either make it clear that there is merit in the development of each of these sites and allocate both of them, or remove the Aveland school allocation and let the market determine which site comes forward for development first, giving due consideration to their phasing within the most recent SHLAA documents. There are known issues in relation to the potential delivery of the Aveland school site which do not affect the Grimers site, which have to be taken into consideration by the LPA in this process.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: The Aveland School site was considered at the Examination hearing sessions in November 2012 as representations had been made that the site should be allocated (SASub175). No representation was made to the Submission plan about the non-allocation of the Grimers Transport site. The Grimmers site was put forward in the original 2008 SHLAA. As a brownfield site within the village it has been assessed as suitable for development, however, it must be recognised that the site is in...
employment use and has been for much of the time since 2008. As such the site has not been included as contributing to the deliverable Five Year Housing Land Supply because it has been assessed as an site in employment use and redevelopment would be non-policy compliant (with Core Strategy Policy E1). The purpose of the SHLAA is to provide a list of potential sources of housing supply and forms part of the evidence for the preparation of the plan. The SHLAA does not fully assess each site in the same way as the SAP detailed site assessment has, in particular the SHLAA does not apply adopted Core Strategy policy constraints (such as Policy E1 which seeks to retain existing employment sites) to the assessment of the suitability of sites for housing. Expecting all sites identified as suitable in the SHLAA to be allocated for development is inappropriate, as is clearly stated in the SHLAA report. The Grimers site has been through the detailed site assessment process (site ref BIL02). This concluded that it is a "Brownfield site well located to village facilities and would have no impact on the landscape. Potential contamination [historical], former station building on site may be worthy of preservation. Is an employment site so may need to consider loss of local employment land if it were to be allocated for housing.". The site was also identified as being available: "Site has been promoted through SHLAA as available from 2014 onwards - no known developer involvement". The site was considered by the internal challenge group (ICG) who concluded that: 'BIL02' site is well located for access to local services. Site shape and undesignated heritage asset on site may constrain development layout but would be improvement in townscape terms over existing. Given uncertainty over availability of site, as expected to go to auction at some future point, consider site should be treated as unavailable. Conclusion: Preference would be for development of brownfield site in advance of greenfield site. Uncertainty over availability of the BIL02 site would favour the allocation of site SK/BIL/15." Subsequent to the meeting of the ICG it was confirmed by the agent selling the site that it had been sold and that the new owner was letting the units on the site for commercial use. Two of the existing units are occupied and in use. This would appear to demonstrate some demand for employment uses on the site. Allocation of this site in light of its current use would be contrary to Policy E1 of the Core Strategy. However, it should be recognised that the plan does not prevent the site coming forward for redevelopment at some point in the future, if the employment use becomes unviable. Policy SAPH1 allows for the redevelopment of brownfield sites within LSCs. However any development proposal for the site would have to demonstrate how it complied with the requirements of Policy E1 of the Core Strategy in respect of protecting existing employment sites.

Consultee
372928  Mr Tom Gilbert-Wooldridge
English Heritage

CommentID: 36

Main Mod Ref Number: PHMM31
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

Positively Prepared: Justified: Effective: Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

We greatly welcome the proposed deletion of Site LSC1e (Land at Swinehill, Harlaxton) given the level of harm that development in this location would have on a number of heritage assets. We note that the revised village assessment shows Harlaxton as a Tier 3 Local Service Centre (LSC), which means it is a less sustainable location for development than other LSCs. We welcome that due to revised site assessment and sustainability appraisal, the site at Swinehill is rejected at the first sift because of its heritage impacts. We also welcome PHMM33 and the deletion of the Swinehill site from the Policies Map, both of which are consequential changes arising from PHMM31.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes
**Main Mod Ref Number:** PHMM31  
**Do you consider the main modification to be Legally Compliant:** Yes  
**Do you consider the main modification to be Sound:** No (you object and consider the main modification should be changed)  
If you consider the main modification to be unsound, which of the following tests of soundness does your comment relate to: 
- Positively Prepared: 
- Justified: 
- Effective:  
- Consistent with National Policy: 

Please give details of why you consider the main modification is Sound/Unsound:

We support the removal of site LSC1e (land adjacent to Doctor's Surgery, Swine Hill, Harlaxton). We agree that this would significantly impact on the setting of Harlaxton Manor and its associated Registered Historic Park and Garden (due to the site's location with the Historic Park and Garden). We consider that some housing growth should be directed to Harlaxton for the reasons set out above, and propose Site ADD17 is allocated, as it can be demonstrated that this site can be delivered without impacting on the setting of Harlaxton Manor and its Registered Historic Park and Garden. See Knight Frank report paragraph 6.1, KM Heritage Report and Section 7 of Knight Frank Report (in particular paragraphs 7.14-7.22)

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

We consider that some housing growth should be directed to Harlaxton for the reasons set out above, and propose Site ADD17 is allocated, as it can be demonstrated that this site can be delivered without impacting on the setting of Harlaxton Manor and its Registered Historic Park and Garden.

**Consultee Agent**  
**Consultee**  
261229  
The Welby Estate  
**CommentID:** 59

**Main Mod Ref Number:** PHMM32  
**Do you consider the main modification to be Legally Compliant:** Yes  
**Do you consider the main modification to be Sound:** Yes  
**Do you wish to be notified of the Inspector’s report and/or adoption of the document:** Yes  
**SKDC Response:** Decisions to allocate sites for housing were based firstly on the suitability of settlements and then on the suitability of sites within settlements. The representation states that Harlaxton has a "vast range of local services and facilities". It is not disputed that Harlaxton has a range of services and facilities; it would not be regarded as a Local Service Centre if it did not. However, compared to other LSCs these are few and it has, therefore, been placed in Tier 3. Allocations have not been made in any Tier 3 village. The Representation [Heritage Report para 10] states that development of the site would clearly affect the heritage assets [CA and Harlaxton Manor], but that it does not follow that these effects will be harmful. The SA/SEA report is clear that the effects of development on this site cannot be assessed without further information. For that reason the assessment shows "? uncertain effect".

**Consultee Agent**  
**Consultee**  
776762  
Mr Peter Burrows  
Lindpet Properties Ltd  
**CommentID:** 13

**Main Mod Ref Number:** PHMM32  
**Do you consider the main modification to be Legally Compliant:** Yes
Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

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<th>Justified</th>
<th>Effective</th>
<th>Consistent with National Policy</th>
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<tbody>
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<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Please give details of why you consider the main modification is Sound/Unsound:

It is argued that the use of the former school playing fields as community open space and allotments will not function as anticipated by the LPA of the Parish Council. The site is very detached from the main body of the village, is not readily accessible by potential future users and would not, therefore, directly benefit the overall community. Moreover, potential users of the open space and allotments would, due to the location of the playing fields to the south of the main body of the school, have to travel through any new residential development in order to access the land. This would by no means be convenient or appropriate and would result in the land failing to function for its intended purpose. Whilst the desire of the LPA and the Parish Council is accepted, the reality is clear in that the playing fields at the Aveland school site would not perform as community open space. This is clearly the main driving force behind the promotion of this site where, in reality, the Grimers site could provide areas of open space for community benefit that are more central to the village, accessible and which would, therefore, function for their intended purpose.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

The LPA need to concede the point that the community benefit of open space and allotment provision at the the Aveland school site will not work and that, without this ‘benefit’ to the development, there is little or no reason to allocate this site for development over a more preferable site within the centre of the village.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: The representation suggests that the community use of the playing field is the only reason for allocating the school site for housing development. This is clearly not the case. The site is brownfield, vacant and located within a Local Service Centre. Redevelopment would therefore be wholly compliant with policies in the Core Strategy. The site has also been assessed as the most suitable site for allocation in Billingborough and is, therefore, proposed as such. The playing field element of the site is greenfield and not considered suitable for development. Regardless of the development of the school footprint the playing field function of the site should be retained. That the Parish Council is willing, as evidenced by their representations to the SAP DPD, to take on the management and maintenance of the playing fields as a community resource should be welcomed as it means that the site will be maintained and used in the long term.

Consultee: 26339 Mrs B Buttery
Billingborough Parish Council

CommentID: 27

Main Mod Ref Number: PHMM32

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

<table>
<thead>
<tr>
<th>Positively Prepared</th>
<th>Justified</th>
<th>Effective</th>
<th>Consistent with National Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Please give details of why you consider the main modification is Sound/Unsound:

Billingborough Parish Council supports the general tenor of this modification. As you know it was the prime mover of the modification and had urged the inclusion of a package scheme of housing and community recreation facilities on the Aveland School site throughout much of the SAP consultation rounds. You are also aware that we are working in partnership with Lincolnshire County Council (LCC) , the land owner, on this scheme. There are however some details in your proposed modifications which we would
appreciate being changed. In this respect we support the separate further comments made by our partner, LCC and would add the following. Whereas the modification wording in PHMM32 (LSC1e) shows a high level of understanding of the scheme and should remain largely unchanged, it is crucially important that there is a separate access to the community recreational area that does not pass through the net housing site. There are several very good reasons for this: 1. The access track is already there, between the school buildings and the cemetery. This is shown as a corridor coloured green on the plan with the original representation submitted by LCC in November 2011 which BPC supported. 2. This existing track gives access directly to the distributor road, Birthorpe Road, thus avoiding substantial traffic for football matches and dirty traffic for the allotments passing through the new housing area 3. The track can allow early development of the community recreational area before the housing development is complete.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

We propose that the plan at Section 3 is re-drawn to reflect exactly the plan submitted by LCC in November 2011 - the housing area should be shown separately from the linked community recreation area - but it's one scheme and there is no reason to amend the good wording of the paragraph in LSC1e so long as it can be clear that 'the development' refers to the overall development and not just the housing development. In this way the area for housing will be less (ie 1.5ha). This Council is on the record with the community saying that there will be no more than 20 to 25 dwellings - this is a very delicate issue locally and it is only in this way that community support has been obtained. This was the basis of our original representation. However we note now that you have increased the number of dwellings to 35 in PHMM62 and in a schedule elsewhere which we cannot locate again. The number of dwellings should be changed to 25 reflecting the density of the houses opposite on Birthorpe Road and in order to not risk losing community support. A vociferous minority has always suspected that our proposal for 20 to 25 houses would be the thin end of the wedge for a larger scheme and increasing this number to 35 plays to this suspicion and could undo the scheme.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector

Yes

In order to impress upon the Inspector that this is our community based scheme and whilst all parties including SKDC are supporting it, it is important to get the principles right with regard to the housing area, the recreation access strip and the recreation area and the housing capacity. After all, without our proposal the housing allocation to Billingborough would have been zero!

Do you wish to be notified of the Inspector's report and/or adoption of the document:

Yes

SKDC Response: In response to representation ID9 (PHMM32) the Council has accepted that the boundary for the site shown in the modifications is not quite the same as the area identified by the land owner. It is understood that the strip of land along the western boundary will provide access to the playing fields at the rear of the site and should not, therefore, be included within the allocated site. The allocated site was drawn to reflect the built footprint of the building and its access and parking area. However, it is accepted that squaring off the southern boundary would make a more practical shape for development. Retaining a separate access to the playing fields at the rear would address local concerns about access to community playing fields. However, these boundary amendments should not change the overall size of the allocation or alter the indicative capacity of the site which is based upon an average density of 27 units to the ha for the net developable area (1.26ha). This is lower than the average density which has been used to determine the indicative capacity of other allocations in the plan and would not result in an over development of the site. Policy EN1 of the Core Strategy will be used to ensure that the design and layout of a development scheme on the site reflects its location on the edge of the village and protects the amenity of neighbouring properties. It should be noted that the plan provides for an indicative number of houses: this is indicative and not a requirement. Restricting the site capacity to 20 homes is unreasonable and unjustified and could render the redevelopment of the site unviable.
Main Mod Ref Number: PHMM32
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)
If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared
- Justified
- Effective
- Consistent with National Policy

Please give details of why you consider the main modification is Sound/Unsound:

LCC welcomes the allocation of the former Aveland High School for housing under Policy LSC1. The closure of part of the school of the St Georges Academy in 2012 provides an opportunity to deliver housing on previously developed land in a sustainable settlement. This will also release the playing field to the rear of the school for village playing fields and allotments, as specified in the policy under the 'specific community benefit' section of the policy, albeit this refers to the former Aveland High School site as LSC1e when it is listed as site LSC1a in the main policy.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

The policy schedule identifies the site area as 1.26ha, yet the text under the table correctly refers to 1.5ha. The plan that shows the site boundary measures 1.62ha, but this includes the proposed separate access to the playing field along the western boundary. The document should consistently refer to 1.5ha. The policy reference should be corrected to site LSC1a in the specific community benefit section. The plan that shows the site allocation should be amended to show a straight southern boundary, as the current boundary creates an irregular shape that fails to consider whether this will result in a suitable housing scheme. The line at the south western section should be extended across the site in a straight line across the south eastern section, in accordance with the plan submitted on behalf of LCC in response to the Site Allocations consultation. This will enable a suitable housing layout to be designed.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response:
1.26 ha represents an 80% net developable area (the proportion of the site which is expected to be developed using the Council's revised SHLAA methodology). It is accepted that the boundary for the site shown in the modifications is not quite the same as the area identified by the land owner, particularly as it includes a strip of land to the west of the existing school buildings. It is understood that this strip of land will provide access to the playing fields at the rear of the site and should not, therefore, be included within the allocated site. The allocated site was drawn to reflect the built footprint of the building and its access and parking area. However, it is accepted that squaring off the southern boundary would make a more practical shape for development and retaining a separate access to the playing fields at the rear would address local concerns about access to community playing fields. These boundary amendments should not change the overall size of the allocation or alter the indicative capacity of the site which is based upon an average density of 27 units to the ha.

Consultee
776786 Mr Tim Slater
Larkfleet Homes

Agent
776166 Mr Matt Hubbard
Antony Aspbury Associates Ltd

CommentID: 14
Please give details of why you consider the main modification is Sound/Unsound:

The provision of an element of retail development within the village of Colsterworth has long been a desire of the Parish Council but has never been fully justified or backed up with evidence of retail need. A recent appeal within the village showed that there was not a defined need for a small element of retail development as part of that development site. It is welcomed that the LPA are now only suggesting that a 'small local scale shop' is required as opposed to the provision of a 'small local centre' but there is still no evidence that such a provision is needed. The LPA's modification also states that the provision should be made either as part of the development '...or at a later date'. The development of site LSC1b (application submitted) makes provision for a small local shop at some point in the future, but the developers need to be certain on retail need before any formal provision is made. In this respect the applicants have indentified the site for future retail development but are not proposing that this provision comes forward unless it is fully justified by a defined need.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

The proposed modification to allow for the future provision of a small local shop represents proper planning and allows for such provision to be fully justified before a planning application is made.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: Support noted

Consultee  
26365 Mrs P Stuart-Mogg
Stamford Town Council

CommentID: 62

Main Mod Ref Number: PHMM35

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: No (you object and consider the main modification should be changed)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

Positively Prepared: Justified: Effective: Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

The Town Council is unsure why this has been added and then crossed through. Reference is made at several points to the wastewater treatment works in respect of Stamford. The Town Council would welcome confirmation of this and in particular in relation to large areas of developments.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector No

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: References to the Water Cycle Study (WCS) throughout the Plan have been updated (and proposed as modifications) to reflect the WCS update statement prepared by Anglian Water and the Environment Agency for the purpose of the examination hearing sessions. As WCS detail relating to Stamford is contained in Section 4.1, the paragraph referred to is proposed to be deleted to avoid duplication.
CommentID: 8

Main Mod Ref Number: PHMM38

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

From the latest modifications proposed, we are pleased to SUPPORT the proposed amendments in principle of SAP6 (Existing Employment Areas) which importantly identifies the land to which the Policy refers. This will give added impetus and ultimately 'confidence' in the market that the land has clear development potential. We warmly welcome the changes to promote Gonerby Moor as a location for economic development which is both socially and economically good for SKDC. It provides SKDC with an employment location which can compete in the local market and hopefully redress the imbalance of A1 focused development which has been brought forward in neighbouring authorities over the past 10 years. The NPPF has made it quite clear that planning should support sustainable economic development, be flexible in accommodating needs not anticipated in the plan and take into account market signals. Suggest some minor changes to the proposed wording in PHMM38

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

Recommend rewording PHHMM38 to read: ‘Suitable employment-generating development in this location is that which cannot be accommodated or brought forward on current or allocated employment sites in Grantham, and which requires good, easy access to the strategic road network or utilises the potential for rail access which is only available in this location’. We also consider that 'A specific use ....' should be omitted as we do not understand how it would be enforced in reality and it could actually deter development. We would suggest that the wording should be: 'Within the search area identified on the proposals map, new employment-generating development will be permitted at Gonerby Moor where the applicant clearly demonstrates that this proposal is for: Development whose land and locational requirements cannot be accommodated on land which is allocated for employment use in the Grantham Area Action Plan and that no other premises or land is available,suitable and viable (proposed insertion) to meet the needs of that development within Grantham.'

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes

We would like to discuss how small changes to the wording of Policy SAP6 (as set out) would encourage investment and market interest into the area. This has to be the principle 'purpose' of a Site Allocations Document. By having the opportunity to speak in front of an Inspector we would seek to justify this.

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response:

Support for the change is noted. The phrase "specific use" has been included within the policy to allow for the development of the site for a single end user that may have specific locational requirements which cannot be accommodated elsewhere. As such the site may be required for a specific use, an example would be as a rail freight depot (as suggested). If a proposal were submitted for the site for this use the Council would want to limit the sites development to that specific use to reflect the unique characteristics of the sites location.
Main Mod Ref Number: PHMM39
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)
If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

Support in principle the modifications made in relation to SAP6. However we do not believe that the land outside the boundary of Mickling and Oakdale Farm should be included in the "Search Area" shown on the proposals map. It has not been actively promoted for allocation and the land to the North West falls within the 'Medium' category of the 2007 SKDC Landscape Assessment (January 2007) whereas the Mickling & Oakdale land is all within the 'Low-Medium' Category. This was identified to SKDC in a 'Draft Design Document – September 2007' produced by Savills.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

A more focused 'search area' will give greater certainty to the market of the development opportunity.

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: Yes

We consider it important to consider what impact the extent of the 'search area' might have on the deliverability of a new scheme. A more focused 'search area' will give greater certainty to the market of the development opportunity.

Do you wish to be notified of the Inspector's report and/or adoption of the document: Yes

SKDC Response: The search area is, as it says, an area of search. It is not an allocation of a specific site for a specific use. The area has been made bigger than the area promoted by the original representation to allow for a larger or alternative configuration of development site should further investigations demonstrate that the rail freight element of any future scheme will demand additional land or a different shape site. By establishing a search area rather than a specific allocation the plan allows a considerable degree of flexibility to accommodate a development which may not be accommodated elsewhere in the District.

Consultee: Mr Tom Gilbert-Wooldridge
Agent: English Heritage

CommentID: 37

Main Mod Ref Number: PHMM41
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)
If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

We welcome the further proposed modifications in relation to Belton House and Park, following the original proposed modifications from July 2012 (SAPMM043). This modification is consistent with the Statement of Common Ground signed between the Council, English Heritage and the National Trust on 16 October 2012 and provides clarity on the role of the Belton Setting Study. NB - the schedule of modification refers to this modification as paragraph 4.8.2 rather than 5.8.2 as shown in the tracked changes DPD.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:
If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted. There is no significance in the tracked changes DPD having a different paragraph number (the inclusion of a new section for the Sustainable Development Model Policy has affected the way in which the publishing software has numbered subsequent sections).

Consultee
490730 Mr Alan Hubbard
The National Trust

CommentID: 43

Main Mod Ref Number: PHMM41
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

This is a necessary addition to the Site Allocations DPD as Great Gonerby is within the identified wider setting of Belton House. Whilst development can potentially be accommodated on the site it will be necessary for its form, massing and detailed treatments (including to its boundaries) to have required to the impacts upon the setting of Belton, especially its visual setting. This addition is also considered to be necessary to ensure consistency with Para 4.1.13 and related Policy EN1 of the Adopted Core Strategy.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No
Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted

Consultee
490730 Mr Alan Hubbard
The National Trust

CommentID: 44

Main Mod Ref Number: PHMM42
Do you consider the main modification to be Legally Compliant: Yes
Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

The proposed modification directly and satisfactorily addresses concerns raised by National Trust (and English Heritage) to the Submission Site Allocations DPD, in particular in
terms of the accuracy of the reference made to the Belton Setting Study (which itself is referred to within the Core Strategy). The change now proposed accords with the suggested revised wording put forward by the Council, English Heritage and National Trust in its Statement of Common Ground and accordingly is supported.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

Do you wish to be notified of the Inspector's report and/or adoption of the document:  Yes

SKDC Response:  Support noted

Consultee	Agent
372928  Mr Tom Gilbert-Wooldridge
English Heritage

CommentID:  38

Main Mod Ref Number:  PHMM42
Do you consider the main modification to be Legally Compliant:  Yes

Do you consider the main modification to be Sound:  Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

- Positively Prepared:
- Justified:
- Effective:
- Consistent with National Policy:

Please give details of why you consider the main modification is Sound/Unsound:

We welcome the further proposed modifications in relation to Belton House and Park, following the original proposed modifications from July 2012 (SAPMM043). This modification is consistent with the Statement of Common Ground signed between the Council, English Heritage and the National Trust on 16 October 2012 and provides clarity on the role of the Belton Setting Study. NB - the schedule of modification refers to this modification as paragraph 4.8.3 rather than 5.8.3 as shown in the tracked changes DPD.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector  No

Do you wish to be notified of the Inspector's report and/or adoption of the document:  Yes

SKDC Response:  Support noted There is no significance in the tracked changes DPD having a different paragraph number (the inclusion of a new section for the Sustainable Development Model Policy has affected the way in which the publishing software has numbered subsequent sections).

Consultee	Agent
372928  Mr Tom Gilbert-Wooldridge
English Heritage

CommentID:  39

Main Mod Ref Number:  PHMM43
Do you consider the main modification to be Legally Compliant:  Yes

Do you consider the main modification to be Sound:  Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:
Please give details of why you consider the main modification is Sound/Unsound:

We welcome the further proposed modifications in relation to Belton House and Park, following the original proposed modifications from July 2012 (SAPMM043). This modification is consistent with the Statement of Common Ground signed between the Council, English Heritage and the National Trust on 16 October 2012 and provides clarity on how development proposals should be assessed in relation to Belton House and Park (where applicable).

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted

<table>
<thead>
<tr>
<th>Consultee</th>
<th>Agent</th>
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<tbody>
<tr>
<td>490730 Mr Alan Hubbard</td>
<td>The National Trust</td>
</tr>
</tbody>
</table>

CommentID: 45

Main Mod Ref Number: PHMM43

Do you consider the main modification to be Legally Compliant: Yes

Do you consider the main modification to be Sound: Yes (you support the main modification)

If you consider the main modification to be unsound, which of the following test of soundness does your comment relate to:

<table>
<thead>
<tr>
<th>Positively Prepared:</th>
<th>Justified:</th>
<th>Effective:</th>
<th>Consistent with National Policy:</th>
</tr>
</thead>
</table>

Please give details of why you consider the main modification is Sound/Unsound:

The proposed modification directly and satisfactorily addresses concerns raised by National Trust (and English Heritage) to the Submission Site Allocations DPD, in particular in terms of the accuracy of the reference made to the Belton Setting Study (which itself is referred to within the Core Strategy). The change now proposed accords with the suggested revised wording put forward by the Council, English Heritage and National Trust in its Statement of Common Ground and accordingly is supported.

Please set out what change(s) you consider necessary to make the main modification Legally Compliant or Sound:

If your representation is seeking a change do you consider it necessary to have your views heard in front of the Inspector: No

Do you wish to be notified of the Inspector’s report and/or adoption of the document: Yes

SKDC Response: Support noted