



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

# LOCAL PLAN REVIEW - ISSUES AND OPTIONS CONSULTATION

## Appendix 1 – Full Representations



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

## Index of respondent's names and representation identification in number order

Representation ID	Given Name	Surname	Company/Organisation	Representing on behalf of
SK.IAO.0001	John	Davis	Petersham Land Ltd	
SK.IAO.0002	Caroline	Harris		
SK.IAO.0003	Phillip	Gadd		
SK.IAO.0004	Emily	White		
SK.IAO.0005	Cameron	White		
SK.IAO.0006	Alison	Heine	Heine Planning	
SK.IAO.0007	Derek	Pollard		
SK.IAO.0008	Malcolm	Hall	Barkston and Syston Parish Council	
SK.IAO.0009	Courtney	Finn	Grantham Civic Society	
SK.IAO.0010	Sandra	Close	Natural England	
SK.IAO.0011	Jane	Evans	Long Bennington Parish Council	
SK.IAO.0012	Beverly	Mawson		
SK.IAO.0013	Robert	Love	Bidwells	The Rathbone Trust
SK.IAO.0014	John	Dickie	John Dickie Associates	
SK.IAO.0015	A	Kelly		
SK.IAO.0016	Shaun	Sinnott		
SK.IAO.0017	Gaile	McMillan		
SK.IAO.0018	Stephen	Short	Escritt Barrell Golding	Mr Robert Jenkinson
SK.IAO.0019	Tom	Clarke MRTPI	Theatres Trust	
SK.IAO.0020	Nigel	Gough	Nigel Gough Associates Ltd	Trustees of the Richard Bettinson Will Trust
SK.IAO.0021	Stewart	Paitence	Anglian Water Services Ltd	
SK.IAO.0022	Adam	Brookes		
SK.IAO.0023	Steve	Beard	Sport England	
SK.IAO.0024	Jacqui	Bunce	NHS Lincolnshire	
SK.IAO.0025	Emilie	Carr	Historic England	
SK.IAO.0026	Robert	Batchelor		
SK.IAO.0027	Keri	Monger	Environment Agency	
SK.IAO.0028	Phil	Hughes	Lincolnshire County Council	
SK.IAO.0029	John	Pearce	Harris Lamb	Barberry Grantham Ltd.
SK.IAO.0030	Emma	Walker	Phase 2 Planning Development Ltd	The Roberts Family
SK.IAO.0031	Michael	Braithwaite	Robert Doughty Consultancy Limited	Mr MJ Dickinson
SK.IAO.0032	Michael	Braithwaite	Robert Doughty Consultancy Limited	Gibbons (Holdings) Limited
SK.IAO.0033	Matt	Verlander	Avison Young	National Grid
SK.IAO.0034	Charlotte	Bailey	DLP Planning Ltd	Mr Ivor Crowson
SK.IAO.0035	James	Mason	Stamford Civic Society	
SK.IAO.0036	Patricia	Stuart-Mogg	Stamford Town Council	
SK.IAO.0037	Kim	Miller	National Trust	
SK.IAO.0038	Richard	Bailey	Homes England	Defence Infrastructure Organisation (DIO)

Representation ID	Given Name	Surname	Company/Organisation	Representing on behalf of
SK.IAO.0039	Anne	Dicks	East Northamptonshire Council	
SK.IAO.0040	Charlotte	Bailey	DLP Planning Ltd	Stamford Property Company Ltd
SK.IAO.0041	Guy	Hird	Witham Drainage Board	
SK.IAO.0042	Sarah	Legge	Melton Borough Council	
SK.IAO.0043	Julia	Miller		
SK.IAO.0044	Sarah	Roberts		
SK.IAO.0045	David	Grove		
SK.IAO.0046	Ayla	Smith		
SK.IAO.0047	John	Freeman	Claypole Parish Council	
SK.IAO.0048	Nigel	Percy		
SK.IAO.0049	David	York		
SK.IAO.0050	Anne	Gayfer	South Lincolnshire Green Party	
SK.IAO.0051	Mark	Bassett	Freeths	Padley
SK.IAO.0052	Chris	Charlton	Rippingale Parish Council	
SK.IAO.0053	Angela	Tarsey		
SK.IAO.0054	Sue	Green	Home Builder Federation (HBF)	
SK.IAO.0055	Roy	Knighton		
SK.IAO.0056			Peakirk Parish Council	
SK.IAO.0057	David	Shelton	Deepings Neighbourhood Plan Group	
SK.IAO.0058	Lucy	Stephenson	Savills	Landowners - Land at Grange Farm
SK.IAO.0059	Lucy	Stephenson	Savills	Landowners - Land at Old Post Lane
SK.IAO.0060	Lucy	Stephenson	Savills	Landowners - Land West of Ropsley, Grantham
SK.IAO.0061	Lucy	Stephenson	Savills	Landowners - Land at Heath Farm (South of Harrowby Lane)
SK.IAO.0062	Lucy	Stephenson	Savills	Landowners - Land at Tennyson Avenue
SK.IAO.0063	Paul	Butler	PB Planning	Invicta Developments
SK.IAO.0064	A	Brooks		
SK.IAO.0065	Edward Toyne	Dring	Retired	
SK.IAO.0066	Jeremy	Dawson	Strutt & Parker	Cecil Estate Family Trust
SK.IAO.0067	Louise	Brown	Deeping St James Parish Council	
SK.IAO.0068	Maria	Boyce	Savills	Landowners - Land North of Harrowby Lane
SK.IAO.0069	Anne	Dew	Persimmon Homes East Midlands	
SK.IAO.0070	Luke	Bamforth	Greater Lincolnshire Nature Partnership	
SK.IAO.0071	India	Chard	Bidwells	Mrs A Knight and Mrs V Sandall

Representation ID	Given Name	Surname	Company/Organisation	Representing on behalf of
SK.IAO.0072	David	Hutchinson	Boyer	Mr Douglas and Andrew Freeman
SK.IAO.0073	Laura	McCombe	Boyer	Mr T Wade
SK.IAO.0074	Laura	McCombe	Boyer	Mr Nick and Tim Wade
SK.IAO.0075	Steve	Harley	Oxalis Planning Ltd	Milton (Peterborough) Estates Company ('Milton')
SK.IAO.0076	Martin	Herbert	Brown & Co - Property and Business Consultants LLP	I, P, D and P G Bailey
SK.IAO.0077	Nikki	Gascoigne	Ropsley and District Parish Council	
SK.IAO.0078	Bernard	Champness	Thurlby Parish Council	
SK.IAO.0079	Martin	Herbert	Brown & Co - Property and Business Consultants LLP	
SK.IAO.0080	Sarah	Clark	Planning and Design Group (UK) Limited	G.E & B Fearn Farms Limited
SK.IAO.0081	Nick	Sandford	The Woodland Trust	
SK.IAO.0082	Azar	Wood	Stamford Bypass Group	
SK.IAO.0083	Michael	Thompson		
SK.IAO.0084	Adam	Clink		
SK.IAO.0085	Angela	Smedley	Fisher German LLP	Oldrid. & Co. Ltd
SK.IAO.0086	David	Holmes	Old Somerby Parish Council	
SK.IAO.0087	Jessica	Graham	Savills	The Crown Estate
SK.IAO.0088	Maria	Boyce	Savills	Absolute Property Development
SK.IAO.0089	Richard	Cleaver		
SK.IAO.0090	David	Henry	Savills (UK) Ltd	Burghley House Preservation Trust
SK.IAO.0091	Steven	Doel	Nexus Planning	CEG
SK.IAO.0092	Dale	Wright		
SK.IAO.0093	David	Hutchinson	Boyer	JE Wade and Sons
SK.IAO.0094	Gabrielle	Rowan	Pegasus Group	Longhurtst Group Ltd & Jaberwocky Investments Ltd
SK.IAO.0095	Lynette	Swinburne	Savills	Grantham Estates
SK.IAO.0096	Michael	Swann		
SK.IAO.0097	Christine	Swann		
SK.IAO.0098	Philip	Ashbourn		
SK.IAO.0099	Peter	Armstrong	Londonthorpe & Harrowby Without PC	
SK.IAO.0100	Lynette	Swinburne	Savill	Lincolnshire County Council Corporate Property
SK.IAO.0101	Ian	Sismey	Bourne Town Council	
SK.IAO.0102	Jilliean	Marshall		
SK.IAO.0103	Philip	Cupit	Barrowby Parish Council	
SK.IAO.0104	Nigel	Harris	Boyer	Richborough Estates Ltd.

Representation ID	Given Name	Surname	Company/Organisation	Representing on behalf of
SK.IAO.0105	Tara	Shippey	Harcourt Land and Developments	Mr & Mrs Jeff & Judith Thompson & Burrows
SK.IAO.0106	Tara	Shippey	Harcourt Land and Developments	Mr & Mrs Jeff & Judith Thompson & Burrows
SK.IAO.0107	Maria	Boyce	Boyer	Absolute Property Development
SK.IAO.0108	Nigel	Jones	Barrowby Neighbourhood Plan Group	
SK.IAO.0109	Adam	Murray	Andrew Granger & Co. Ltd	Mr PJSR Hill and Pikeace Limited
SK.IAO.0110	Mike	Brooman	Castle Bytham Parish Council	
SK.IAO.0111	Joyce	Stevenson		
SK.IAO.0112	Kit	Longstaff	R.Longstaff & Co	R. Peasgood
SK.IAO.0113	Kit	Longstaff	R.Longstaff & Co	Tinsley
SK.IAO.0114	Kit	Longstaff	R.Longstaff & Co	R. Adcock
SK.IAO.0115	Kit	Longstaff	R.Longstaff & Co	Adock, Kilman and Wire
SK.IAO.0116	Kit	Longstaff	R.Longstaff & Co	Kilman, Hill, Custons, Wire
SK.IAO.0117	Kit	Longstaff	R.Longstaff & Co	Knight
SK.IAO.0118	Kit	Longstaff	R.Longstaff & Co	Whitfield
SK.IAO.0119	Kit	Longstaff	R.Longstaff & Co	A. Woolley
SK.IAO.0120	Kit	Longstaff	R.Longstaff & Co	J. Day
SK.IAO.0121	William	Lee	Buckminster	
SK.IAO.0122	Steve	Frisby	SKDC - Parks	
SK.IAO.0123	Hilda Ann	Johnson		
SK.IAO.0124	Kit	Longstaff	R.Longstaff & Co	W. Ash

**Amy Bonfield**

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**From:** John Davis [REDACTED]  
**Sent:** 13 October 2020 13:33  
**To:** PLANNING POLICY  
**Subject:** SKDC Local Plan Review. Public Consultation.

**Categories:** Yellow Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

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Dear Sirs,

I am responding to only limited elements of your South Kesteven Local Plan Review, as opposed to completing the entire Issues and Options Response Form.

I am not a local resident. I do however have a commercial interest as the owner of Property in High Street and Guildhall Street Grantham.

I believe I can speak with some authority about this area, but prefer not to comment on other issues affecting South Kesteven, as I consider my opinions would be of limited value.

It is depressing to have to start by recording what is a very negative picture of retail within Grantham Town Centre, but little will be gained by ignoring reality.

For a variety of reasons the High Street, indeed the entire core shopping area of Grantham needs emergency support, so as to ensure it does not fall into terminal decline.

There is little merit in apportioning blame, simply the reasons for decline have to be acknowledged by those charged with the towns recovery.

Without first of all understanding and recognising the mistakes of the past, a vision for the future seems unlikely to succeed.

I would like to respond to PROPOSAL 1- 2036 Vision for South Kesteven.

Grantham

I agree Grantham's role as the Sub-Regional Centre will be strengthened through significant housing and employment growth.

With this in mind I have no doubt officers and members wish the Town Centre is to be considered a part of this growth and have no desire to see it's decline continue.

Sadly the numerous, out of town, and edge of town, retail developments that exist today, are simply not complementary to a vibrant Town Centre. They are competition, and of course "unfair" competition, particularly when every facility is offered to ensure these new developments are considerably more user friendly than the Town Centre.

One obvious example of this is car parking.

Car parking for Out of Town retail schemes is convenient, free, and adequate, whilst to park near shops in the Town Centre is difficult and you have to pay !!!

This has of course been a major cause to the Towns decline and several large space users are today looking to relocate out of town.

The enormous amount of vacant retail property in the Town Centre is not new. It's slow decline has been evident for well over a decade, and as well as the above, the situation has been exacerbated by online shopping, and of course this year, Covid 19.

Whilst much of the damage has been done, all is not lost and there are actions that will help enormously to encourage vibrancy in Grantham Town Centre.

Encouraging town centre residential schemes would help bring people back to the town, and have the added benefit of providing customers to those retailers that remain in the Town Centre.

Step one in this process is acceptance that there is little or no demand for retail accommodation beyond the central core area, and hoping things might change is as fanciful as believing Amazon may stop trading any time soon !!!!! Even rental values in prime parts of High Street Grantham are now lower than industrial property on the edge of town !!! This is a phenomenon that is unheard of in the history of shopping in the UK. If any reader struggles to understand the consequences of this, please contact me, and I will happily explain.

However, I passionately believe the Town Centre can survive, indeed it can thrive, but it must be supported by local government, and NOW !!!! There is no time to lose.

The commercial world will not slow the process of change, so as to accommodate any of our desires to debate local plans.

The Government's recent edict that all vacant retail accommodation can be converted or developed for residential use, should be seized upon and encouraged.

It will not work to hope that retail will recover, or quasi retail will take up the slack. They will not. The periphery needs to be developed as soon as is reasonably possible so the central retail core has a chance.

To all of you who are saying to themselves " A developer wouldn't say this wouldn't they " . You need to know, this won't be easy, as the viability of residential development is very questionable.

Once again, the writer will happily explain, if that would be helpful.

Returning to the issue of cars. It has been the mantra for years both at Government and local level, to keep cars out of Town Centres. It's worked !!! The majority of the population now drive their cars to "out of town" retail !!!!!

The concept that it was wise to keep homes and cars out of Town Centres, was always doubtful, but in these times must be challenged. I suggest the opposite is what is required in Grantham.

The suggestion, that keeping cars out of town, it is environmentally friendly, may appear logical, but has proved too often, not be the case.

I am asking that SKDC work with land owners to improve access for both cars and public transport. Encourage residential and leisure development in the Town Centre. Help make both financially viable.

Objective 6 of your Vision and Objectives for South Kesteven is to facilitate and enhance the role of Grantham as an important Sub - Regional centre.

If this Objective is serious I judge a vibrant Town Centre is an important element.

I do understand the emotional struggle when considering such dramatic changes to a town with such a rich history, but I am reminded that progress waits for no man, and vacant property rots the very soul of a community.

I am quite willing to be part of a future conversation. I hope you will invite all stakeholders, including retailers and property owners to brain storm about what is needed.

All our interests are in my opinion aligned.

Now is the time for some bold thinking, and action.

I look forward to hearing from you.

Your Sincerely,

John Davis

Petersham Land Ltd.



**Amy Bonfield**

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**From:** [REDACTED]  
**Sent:** 13 October 2020 16:51  
**To:** PLANNING POLICY  
**Subject:** PERMANENT RECYCLING CENTRE

**Categories:** Yellow Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear MR ROGER RANSON.

With reference to your e mail regarding the LOCAL PLAN REVIEW ISSUES AND OPTIONS REPORT MY RECOMMENDATION AND SUGGESTION OF A PERMANENT RECYCLING CENTRE IN STAMFORD HAS NOT EVEN BEEN MENTIONED.

DOES THIS NOW MEAN THAT THIS VERY IMPORTANT AND NECESSARY SERVICE IS NOT GOING TO BE INCLUDED IN THE REVIEW?

I, and so many residents in the town really would like this to be built sooner for our rapidly expanding town.

With SO many new houses that will be built around Stamford, this is VITALLY IMPORTANT NOW THAT A CENTRE BE INCLUDED.

PEOPLE AT THE PRESENT HAVE TO GO 25 mile round trip to the centre at BOURNE, and that's only the people who've got transport.

In previous roadshows and consultations I've been very encouraged by several different developers who thought my proposal was so important for our environment.

They even suggested giving money towards this facility.

Please acknowledge that a PERMANENT RECYCLING CENTRE WILL BE GIVEN MUCH MORE SUPPORT FOR STAMFORD ALONG WITH ALL THE MAJOR HOUSING DEVELOPMENTS BEING PROPOSED.

YOURS SINCERELY

MRS CAROLINE HARRIS.



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	MR	
First Name	PHILIP	
Last Name	GADD	
Organisation	████████	
Address	████████████████ ██████████ ██████	
Postcode	████████	
Telephone	██████████	
Email Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████████████████████████████████████	14/10/2020

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**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No	no	Unsure	
If not please provide details.					
Lack of infrastructure with the Grantham area will cause problems. The lack of hospital facilities within the Grantham are should be a concern to developments. Lack of school places, doctors availability. Inability of electrical, gas and water infrastructure to large scale development.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	no	Unsure	
If not please provide details.					
Almost all of the large scale developments pay little respect to the sustainability, they are usually a one line statement of intent. No provision for solar panels, no water harvesting, heat pumps, thermal water heating. The reduction in affordable or no social housing on the large estates proposed show that SKDC appear to want a divided community. All new developments should have social housing which is successfully integrated into developments. SKDC still appear to want to build boxes & put social housing residents on the edge of estates... hardly an effective integration. The economics of the district relies on local jobs, the local plan appears to fail in attracting large industry. The new estate south of Grantham will become a commuter belt housing where people will travel to jobs outside the local area.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No	no	Unsure	
If not please provide details.					
The land grab carried out within the Grantham area in particular is of concern. Valuable open spaces & green fields will be built on to the detriment of wildlife, people using them for health issues. The area will have no playing fields or green spaces within the urban environment if they are built on.					

The local plan seems to care little for environmental protection and appears to be a 'Right to Build' at whatever cost.  
 More concrete will increase the flood risk in lower areas of the Witham and other local flood risk areas.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No		Unsure	
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If not please provide details.

SP3

OS1

These need to be revisited to ensure that MORE consideration is given to the local community regarding infill and the provision or use of POS. SKDC have made many proposals to build on existing POS against the local public's concerns & issues raised.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No	NO	Unsure	
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If not please provide details

Government policy appears to change yearly the existing plan timetable should be retained. It is of little use extending the Local Plan until enough is known about the current changes planned by the Government.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No		Unsure	unsure
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If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

Yes		No		Unsure	unsure
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**If not, please provide details of what changes you think should be made.**

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

Yes		No		Unsure	unsure
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**If so, please outline any suitable and deliverable proposals.**

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?**

Yes		No	no	Unsure	
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**If not, what evidence do you have to justify an alternative need and requirement?**

The current area has massive pressure to maintain the existing community. Improve the infrastructure and local community provisions then you may build something worthwhile for the long term. Build 754 houses per year and you will have health problems, no doctors, dentists, hospital issues. Thought should be given how people live so more money from developers should be re-invested in the community not trying to squeeze the life out existing people and services.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

Yes		No	no	Unsure	
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**If not, please provide details and any alternative proposals.**

The Growth area appear to be the South of the county. More provision should be made within the Stamford area. Bourne already appears to have plenty of build land and provisions. Grantham has plenty of building land in the Local Plan such as the Southern Quadrant and Barracks.

Stamford appears to be left alone and few provisions are made to build other than the existing industrial site at Cummins which is already accepted as developed. No major green spaces or POS will be used in Stamford unlike Grantham.

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>		<b>No</b>	<b>NO</b>	<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>unsure</b>
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**If not, please provide details and any alternative proposals.**

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>	<b>yes</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

<b>Yes</b>	<b>yes</b>	<b>No</b>		<b>Unsure</b>	
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Please provide details

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

## 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	Yes	No		Unsure	
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If yes, please provide details.

Yes two sites have recently been proposed in Belmont ward. One of the sites received planning. Sites should be made available across the area not focussed on one area.

## 13. Proposal 9 – Revisions to the Employment Policy

### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	unsure
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If not, please provide details.

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### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	unsure
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If not, please provide details.

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## 14. Proposal 10 – Climate Change

### Q10 – Climate Change Policies

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Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	no	Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

New build housing should incorporate more energy savings consistent with their design. Solar Panels and thermal water heating. Increased insulation more accountability over the use of gas boilers and current proposals.

Tree planting & offset planting schemes and wildlife corridors incorporated into the Barracks & South Quadrant.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	YES	No		Unsure	
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#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	YES	No		Unsure	
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Please give details.

Incorporation of at least 1kw of solar anels per build. Discussions will need to take place with DNOs regarding the issues but they will not be difficult to do.

Thermal heating, water harvesting and other renewables sources will need to be considered but provision could be made to encourage their installation by discounts in othe areas or planning requirements.

#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

<b>16. Proposal 12 – Need for Caravan Accommodation</b>					
<b>Q12 – Need for Caravan Accommodation</b>					
Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.					
Yes		No	no	Unsure	
Please give details					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes		No		Unsure	unsure
Please give details					

<b>18. Any other Comments</b>					
<b>Q14 – Any other Comments</b>					
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?					
<p>The existing Local Plan made mistakes about the allocation of the Blessed Hugh Moore site under SKLP260 it was incorrectly allocated Planning Permission which allowed it to bypass other scrutiny. This has now caused issues where SKDC have suddenly decided to develop the site after it failed to appear in other consultation documents due to this MISTAKE. SKDC made other mistakes where they transposed the St Wulframs (SKLP 152) site with Ancaster (SKLP315) These mistakes have now lead to issues where the local community have questioned the validity of the original allocations.</p> <p>SKDC need to explain and restart the process on the BHM Site SKLP 260 where it appears the allocation could have been challenged if the mistake had been noticed earlier.</p> <p>The failures of SKDC led to other tiers of investigation being bypassed leading to an abandoned consultation which had been carried out during lockdown, this also lead to dismay amongst the community when discussions could not take place legally.</p>					

SKDC continue to ignore the errors they made regarding this site and had failed to discuss an existing covenant on the land.

SKDC refused planning permission previously on the land when it was proposed by Lincs County Council. Now it appears they want to bypass their original decision, mistakes in assessment and a large local opposition to building on this open space.

If this is an example of consultation it appears badly managed.

#### **Part C: Sustainability Appraisal Scoping Report**

#### **19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	Emily	
Last Name	White	
Organisation		
Address	<p>██████████</p> <p>██████</p> <p>██████████</p>	
Postcode	██████	
Telephone	██████████	
Email Address	████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████	19/10/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No x		Unsure	
If not please provide details.					
<p>I believe that the vision should be the same as before. I can only speak on behalf of Bourne, but I am aware from the documentation that there is sufficient enough housing in Bourne for several years so the huge increase in this recent documentation to see us through to 2041 is far too great for the actual need. As the benchmark is continually changing through the many updates/amendments to local plans, it can be very hard to keep up with. Bourne and this specified housing growth does not reflect the growing population in this area. Can our views be used on one questionnaire (the same format) that can be tweaked and edited as local plans make amendments rather than to have repeated questionnaires and consultations?</p>					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes x		No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure x	
If not please provide details.					
<p>It should broadly remain the same, however any developments should work hand in hand with neighbourhood plans at all times.</p>					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

Yes		No		Unsure	x
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**If not please provide details.**

This all depends on what the actual 'not proposed to be changes significantly' statement means. It requires more clarity who and/or what deems significant or not.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

Yes		No	x	Unsure	
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**If not please provide details**

I do not agree as it seems that National Policy is to change National Policy, and therefore Local Policy, about every 12 months. A plan either needs to be stuck to within the timeframe or to stop changing the goalposts.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

Yes		No		Unsure	
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**If not, please provide details of what changes you think should be made.**

No comment

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

Yes		No		Unsure	
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**If not, please provide details of what changes you think should be made.**

No comment

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

No comment.

### 10. Proposal 6 – Housing Need and Requirement

#### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No x		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

This is not justified as mentioned above. Previous plans have already stated that we are already above the required number for Bourne. These parameters/goalposts are continually being changed. I have had four various questionnaires/letters, etc to complete within the last two years.

### 11. Proposal 7 – Distribution of Growth

#### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

No comment.

#### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No x		Unsure	
-----	--	------	--	--------	--

If not, please provide details and any alternative proposals.

I can only speak on behalf of Bourne. As mentioned above, we are already above the housing quota so this is not justified.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

No comment.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

No comment.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

No comment.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

No comment.

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

No comment.

### 14. Proposal 10 – Climate Change

#### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

No comment.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes		No		Unsure	
Please give details.					
No comment.					
<b>Q11c – Viability Implications of Higher Energy Performance Standards</b>					
If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?					
Please give details					
No comment.					

<b>16. Proposal 12 – Need for Caravan Accommodation</b>					
<b>Q12 – Need for Caravan Accommodation</b>					
Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.					
Yes		No		Unsure	
Please give details					
No comment.					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes		No		Unsure x	
Please give details					
I am unsure of what these ‘minimum parking standards’ are to be able to comment.					

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

No

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

No comment.

Thank you for responding to this consultation.



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Cameron	
Last Name	White	
Organisation		
Address	██████████ ██████ ██████████	
Postcode	██████	
Telephone	██████████	
Email Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	19/10/2020

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

**Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?**

Yes		No x	x	Unsure	
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**If not please provide details.**

The vision should remain the same as the previous plan and consultations in 2019. Regarding the situation in Bourne, I am aware that we are already above the required quota of housing so the increase outlined in the documentation is not necessary or required, and if any extra should be the Elsea Park area, where the residents are already exposed and are more accepting to further building, as they were well aware at the time of purchase that potential building would be going on around that area. Whereas if the local planning placed building in areas where previous residents invested and chose properties in an area more quiet and calm, less likely to be built up around (such as North of Bourne, then that is unfair, and would make investing to live in Bourne less attractive, as one would never know if your place of residence would dramatically change, so why would you chose to buy in Bourne if the planning allowed unwanted growth everywhere?).

It can be difficult and tiresome to keep track of the continual changes to the local plan. If an entity wanted to browbeat the residents into acquiescing or complying to what it wanted them to do, then the entity would under the guise of democratic care and concern of their needs, keep requiring them to do endless long questionnaires (exam style) every 6 months, until everyone holds their hands up in surrender, because the Local Plan they thought had been agreed has now altered significantly, and no doubt will keep altering, so what is the point if it keeps changing. That is a recipe for a disengaged and untrusting population, unless that is what is the real desired outcome. Bourne and this outlined housing growth does not reflect the growing population in this area.

So can our initial views be used on one questionnaire (the same format) that then can be tweaked and edited as local plans make amendments rather than to have to do repeated questionnaires and consultations? It feels as though it is devised in this way to wear down the populations views either the existing residents wishes are being met otherwise it appears that whatever the residents feel ultimately does not matter to the powers that be. That would be a very sad state of affairs. I want to live in GB, not in the Soviet Union. Please ensure the democratic of local residents are at the front of ALL decision making.

**Q1b – The Vision**

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?**

Yes x	x	No		Unsure	
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**If not please provide details.**

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes		No		Unsure	x	x
-----	--	----	--	--------	---	---

If not please provide details.

It should broadly remain the same, however any developments should work hand in hand with the Bourne Parish Neighbourhood Plan at all times, and should be desired by the local residents, not against the local community's wishes.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No		Unsure	x	x
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If not please provide details.

This all depends on what the actual 'not proposed to be changes significantly' statement means. It requires more clarity who and/or what deems significant or not.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No	x	x	Unsure	
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If not please provide details

I do not agree as it seems that National Policy is to change National Policy at a drop of a hat, about every 12 months. A plan either needs to be stuck to within the timeframe and stop changing the goalposts.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No		Unsure	x	
-----	--	----	--	--------	---	--

If not, please provide details of what changes you think should be made.

Sorry not sure I understand what this term really means. No comment

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure x	
-----	--	----	--	----------	--

If not, please provide details of what changes you think should be made.

No comment

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure x	
-----	--	----	--	----------	--

If so, please outline any suitable and deliverable proposals.

No comment.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No x	x	Unsure	
-----	--	------	---	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

This is not justified as mentioned above in my comments. Previous plans have already stated that we are already above the required number for Bourne. These parameters/goalposts are continually being changed that this is not treating the residents with respect.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

No comment.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No x	x	Unsure	
-----	--	------	---	--------	--

If not, please provide details and any alternative proposals.

I can only speak on behalf of Bourne. As mentioned above, we are already above the housing quota so this is definitely not justified.  
if any extra growth should be limited to the Elsea Park area, where the residents are already exposed and are more accepting to further building, as they were well aware at the time of purchase that potential building would be going on around that area. Whereas if the local planning placed building in areas where previous residents invested and chose properties in an area more quiet and calm, less likely to be built up around (such as North of Bourne, then that is unfair, and would make investing to live in Bourne less attractive, as one would never know if your place of residence would dramatically change, so why would you chose to buy and live in Bourne if the planning allowed unwanted growth everywhere?).

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

No comment.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

No comment.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please provide details

No comment.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

## 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If yes, please provide details.

## 13. Proposal 9 – Revisions to the Employment Policy

### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

No comment.

### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

No comment.

## 14. Proposal 10 – Climate Change

### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

No comment.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

No comment.

#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

No comment.

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

No comment.

### 17. Proposal 13 – Parking Standards

#### Q13 – Parking Standards

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

Yes		No		Unsure	x	x
-----	--	----	--	--------	---	---

**Please give details**

I am unsure of what these 'minimum parking standards' are to be able to comment.

#### **18. Any other Comments**

##### **Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Please be very careful in allowing growth in areas where residents are really unhappy to receive, such as Beaufort Drive in Bourne. It is not fair creating a climate of constant uncertainty, why would you invest your life savings and choose to live in a place where all those attributes that made you choose in the first place would be dramatically changed. That is why any growth should be limited to areas of existing growth, where one expects such growth.

#### **Part C: Sustainability Appraisal Scoping Report**

#### **19. Comments about the Sustainability Appraisal Scoping Report**

No comment.

Thank you for responding to this consultation.



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MRS
		ALISON
Last Name		HEINE
Organisation		HEINE PLANNING
Address		<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 70%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 50%; height: 15px;"></div>
Postcode		<div style="background-color: black; width: 100%; height: 15px;"></div>
Telephone		<div style="background-color: black; width: 100%; height: 15px;"></div>
Email Address		<div style="background-color: black; width: 100%; height: 15px;"></div>

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 100%; height: 15px;"></div>	29.10.20

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No		Unsure	
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If not please provide details.

--

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details.

--

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes		No		Unsure	
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If not please provide details.

--

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No		Unsure	
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If not please provide details.

--

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes		No		Unsure	
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes		No		Unsure	
If not, please provide details of what changes you think should be made.					
<b>Q5b – Settlement Hierarchy Methodology</b>					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes		No		Unsure	
If not, please provide details of what changes you think should be made.					
<b>Q5c – New Settlement</b>					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes		No		Unsure	
If so, please outline any suitable and deliverable proposals.					

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

--

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

--

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	YES	No		Unsure	
-----	-----	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	NO	Unsure	
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If not, please provide details and any alternative proposals.

**MOST SMALL VILLAGES NEED MORE DEVELOPMENT TO SUPPORT EXISTING SERVICES**

**COVID19 HAS SHOWN THAT PEOPLE CAN LIVE AND WORK REMOTELY WITHOUT THE NEED TO TRAVEL, AND THERE SHOULD BE LESS EMPHASIS ON THE NEED TO CONCENTRATE/CRAM ALL NEW DEVELOPMENT IN TOWNS.**

**THE COUNTRYSIDE PROVIDES AN ATTRACTIVE ENVIRONMENT FOR MOST PEOPLE TO LIVE AND SMALL VILLAGES WOULD BENEFIT FROM AN INJECTION OF LIFE FROM NEW YOUNGER FAMILIES. IT IS IMPORTANT TO STOP RURAL SETTLEMENTS FROM TURNING INTO GODS WAITING ROOM OR AFFLUENT WORK FROM HOME/COMMUTER VILLAGES.**

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	YES	No		Unsure	
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Please provide details

**PLANNING IS ALMOST TOTALLY RELIANT ON PRIVATE DEVELOPERS TO MEET EXISTING NEEDS. THE PLANNING SYSTEM THWARTS AND DISTORTS THIS PROCESS, NOT ALWAYS MAKING HOUSES AVAILABLE WHERE PEOPLE WANT THEM WHICH IN TURN MAKES HOUSES MORE EXPENSIVE IN AREAS WHERE NEW DEVELOPMENT IS RESTRICTED IE THE SMALL VILLAGES. THE ONLY PEOPLE TO BENEFIT ARE THOSE WHO LIVE WHERE DEVELOPMENT IS RESTRICTED.**

**PLANNING IS EXERTING TOO MUCH OF A CONTROL ON THE ABILITY OF PEOPLE TO LIVE WHERE THEY WANT AND FAILING TO DELIVER WHAT IS NEEDED OR IS SUITABLE.**

**THERE NEEDS TO BE A GREATER SHARING OF DEVELOPMENT AND GREATER ACCEPTANCE OF THE NEED FOR MORE DEVELOPMENT ACROSS THE DISTRICT IN RECOGNITION OF THE FACT SOUTH KESTEVEN SERVES/ INTERACTS WITH A LARGE HINTERLAND THAT IS MUCH LARGER THAN THE DISTRICT ITSELF.**

**NEED TO VIEW SOUTH KESTEVEN IN THE REGIONAL CONTEXT AND NOT AS AN ADMIN DISTRICT WHICH HAS LITTLE CONTEXT OR RELEVANCE TO MODERN LIVING PATTERNS.**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

**Yes**

**YES**

**No**

**Unsure**

**If yes, please provide details.**

**-OVERCROWDED CONDITIONS ON COUNCIL SITE IN GRANTHAM WHICH IS SUBSTANDARD WITH INADEQUATE SMALL/ CRAMPED PITCHES FOR FAMILIES.**

**-NEED FOR MORE PRIVATE SITES AS WITNESSED BY CURRENT APPEALS**

**-LATENT NEED FROM THOSE DENIED RIGHT TO LIVE IN THE DISTRICT DUE TO CHRONIC POLICY FAILURE AND SHORTAGE OF SITES**

**URGENT NEED TO UPDATE THE 2016 GTAA (WHICH IS BASED ON 2015 DATA)**

**URGENT NEED TO ALLOCATE LAND TO MEET NEED IDENTIFIED IN 2016 AND FUTURE NEED**

**URGENT NEED TO PROVIDE CHOICE OF SITES BY LOCATION, SIZE, TENURE, TYPE FOR DIFFERENT HOUSEHOLDS IN ATTRACTIVE, APPROPRIATE LOCATIONS.**

**URGENT NEED TO RECOGNISE THIS IS A LAND USE THAT IS HARD TO LOCATE IN URBAN SETTLEMENTS WHERE LAND VALUES ARE TOO HIGH AND A USE OF LAND MORE APPROPRIATE IN RURAL LOCATIONS WHERE LAND IS AFFORDABLE AND AVAILABLE.**

**IT IS VERY UNLIKELY DEVELOPERS WILL AGREE TO MEET NEED ON HOUSING ALLOCATIONS DUE TO DIFFICULTIES SECURING FUNDING/ FINANCE FOR SCHEMES WITH TRAVELLER SITES. LOOK AT THE EXPERIENCE OF OTHER AUTHORITIES-YOU WILL FIND V FEW HAVE SUCCEEDED DOING THIS AND MOST DEVELOPERS LOOK FOR EXCUSES NOT TO DELIVER AND AS WITH AFFORDABLE HOUSING PREFER TO MAKE PAYMENTS FOR SITES TO BE DELIVERED ELSEWHERE.**

**FAILURE TO APPRECIATE HOW HARD IT IS FOR TRAVELLERS TO SELF PROVIDE WHEN COUNCILS WITH ALL THE RESOURCES, CONTACTS AND EXPERTISE AT THEIR DISPOSAL FAIL TO ADDRESS THIS ISSUE. COUNCILS SHOULD BE LESS CRITICAL OF THE CHOICES OF TRAVELLERS WHEN THEY HAVE DONE NOTHING TO SECURE SITES**

**VERY DISAPPOINTING TO NOTE THAT THE GTAA HAS NOT BEEN UPDATED AND YOU ARE ONLY NOW REALISING YOU NEED TO UPDATE THIS. VERY DISAPPOINTING TO NOTE THAT SO LITTLE THOUGHT HAS BEEN GIVEN TO THIS FOLLOWING THE FINDINGS OF THE LOCAL PLAN INSPECTOR AND REJECTION OF COLD HARBOUR/ FULBECK SITES. PLEASE STOP MAKING EXCUSES FOR DOING NOTHING AND STOP LOOKING FOR EXCUSES TO JUSTIFY DOING NOTHING. ADDRESS THIS ISSUE. YOU DO NOT NEED AN UPDATED GTAA TO START LOOKING FOR SUITABLE SITES.**

**I HAVE SEEN NO EVIDENCE OF 'EMBEDDED RELATIONSHIPS WITH THE TRAVELLING COMMUNITIES'? I HAVE NOT BEEN MADE AWARE OF ANY ASSISTANCE BEING GIVEN TO THE TRAVELLING COMMUNITY IN THE PROCESS OF FINDING SUITABLE SITES. HOW CAN YOU HONESTLY WRITE SUCH RUBBISH AND THEN ADMIT YOU REJECTED A SITE YOU THOUGHT WAS SUITABLE WITH ALL THE ASSOCIATED COST AND DELAY OF A PLANNING APPEAL. WHAT SIGNALS DO YOU THINK THIS SENDS OUT TO THE TRAVELLING COMMUNITY? I SEE NO COMMITMENT TO DELIVER AND IN THIS RESPECT YOU ARE NO DIFFERENT TO MOST OTHER COUNCILS IN ENGLAND.**

C1/2006 EXPECTED NEED TO BE DELIVERED WITHIN 3-5 YEARS IE BY 2011. TEN YEARS LATER AND YOU ARE NO CLOSER TO ADDRESSING NEED THAN YOU WERE IN 2006. FROM READING THIS ISSUES AND OPTIONS SECTION I AM NOT CONVINCED YOU HAVE UNDERSTOOD THE MESSAGE FROM THE LOCAL PLAN INSPECTOR OR ACCEPT THE IMPORTANCE OF PPTS.

TRAVELLER FAMILIES ARE SUFFERING DISPROPORTIONATELY DUE TO THIS FAILURE. THEY ARE HAVING TO LIVE IN SUB STANDARD OVERCROWDED CONDITIONS EXACERBATED BY COVID19 WHILST YOU DELIBERATE WHAT TO DO AND FIND EXCUSES TO REFUSE PLANNING APPLICATIONS.

I VERY MUCH HOPE TO SEE A MORE POSITIVE APPROACH TO THIS ISSUE IN FUTURE CONSULTATIONS.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

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**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

--

Yes		No		Unsure	
<b>Please give details</b>					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes		No		Unsure	
<b>Please give details</b>					

<b>18. Any other Comments</b>					
<b>Q14 – Any other Comments</b>					
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?					

**Part C: Sustainability Appraisal Scoping Report**

<b>19. Comments about the Sustainability Appraisal Scoping Report</b>					



**Thank you for responding to this consultation.**



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	MR	
First Name	DEREK	
Last Name	POLLARD	
Organisation	-	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone	[REDACTED]	
Email Address	[REDACTED]	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	26/10/20.

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No		Unsure	<input checked="" type="checkbox"/>
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If not please provide details.

Any extra housing must be planned in conjunction with job availability and adequate infrastructure

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	<input checked="" type="checkbox"/>
-----	--	----	--	--------	-------------------------------------

If not please provide details.

Bourne is in need of urgent action to revitalise the town centre with an ever increasing number of shop closures.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

If not please provide details.

If concerns in Q1a / Q1b are addressed

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
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If not please provide details.

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not, please provide details of what changes you think should be made.					

<b>Q5b – Settlement Hierarchy Methodology</b>					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not, please provide details of what changes you think should be made.					

<b>Q5c – New Settlement</b>					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If so, please outline any suitable and deliverable proposals.					

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	✓
-----	--	----	--	--------	---

If not, what evidence do you have to justify an alternative need and requirement?

Any housing must be accompanied by work opportunities and infrastructure/services improvements

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	✓
-----	--	----	--	--------	---

If not, please provide details and any alternative proposals.

Agree if there is the combined approval regarding jobs, services and infrastructure

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details and any alternative proposals.

### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

Please provide details

Planning for any medium / large developments should only be approved when shown to be essential. No development on productive agricultural land.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

## 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

If yes, please provide details.

The travelling community should contribute to any costs.

## 13. Proposal 9 – Revisions to the Employment Policy

### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

--

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

Please give details.

--

### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	<input checked="" type="checkbox"/>
-----	--	----	--	--------	-------------------------------------

Please give details

This depends on approach to tourism. Or are we considering static residential caravans?

### 17. Proposal 13 – Parking Standards

#### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	<input checked="" type="checkbox"/>
-----	--	----	--	--------	-------------------------------------

Please give details

Restrictions on parking and high parking charges discourage people from visiting town centres - effects have been apparent for many years.

### 18. Any other Comments

#### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

*No comments at this stage*

**Thank you for responding to this consultation.**



## Amy Bonfield

---

**From:** Malcolm Hall [REDACTED]  
**Sent:** 11 November 2020 13:10  
**To:** PLANNING POLICY  
**Subject:** Local Plan Review

**Categories:** Yellow Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi

Barkston and Syston Parish Council have considered the documents circulated in regard to the Local Plan Review, and have no objections, or comments to make.

Regards

Malcolm Hall  
Clerk to Barkston and Syston Parish Council

Sent from [Mail](#) for Windows 10

## **SKDC Local Plan 2011-2036 and further update now approved by SKDC**

The Civic Society commented in detail in the summer of 2019 when the Plan was first published. We supported the emphasis given to sustainable development, particularly Policies SD1 the presumption in favour of sustainable development and SD2 describing the principles of this.

Since Grantham is to receive over 50% of all new house building in South Kesteven there is clearly a need for its roads and transport infrastructure to be developed to handle the increases. The southern relief road is welcomed but we are disappointed to find that no other road development is mentioned in the Plan. This is despite reassuring words on page 30 of the plan “to look at all the issues that relate to transport in the town and set out a range of local proposals to tackle congestion and improve transport options”. Apart from the Southern bypass this has not been done and indeed seems to have been ignored.

Greater connectivity in the town was promised by the completion of Pennine Way to Great Gonerby and a Section 106 agreement was established to fund the railway bridge from house completions at Poplar Farm. This development has been building for the best part of 10 years. The 106 agreement was to cover the originally stated £8m cost of the railway bridge and was inflation proofed so that contributions were increased over the years to keep pace with increases in the bridge cost. The bridge was supposed to be started when 750 houses were completed. There is mention in another council report: the Infrastructure Delivery Plan on page 31 that contributions are insufficient because of the Network rail ransom for the rail bridge. We would like to see the council publish an explanation of the progress of the bridge project. How much has been collected and from how many completed dwellings and is this vital transport link ever going to happen? What was the “ransom”?

The Local Plan is a huge document backed up by several other long and complex reports. The Government Inspector’s report is an impenetrable document that may only be understandable by planning experts. I am sure it all mostly makes sense and the council has approved it being their vision for the future of the district and the town.

However, we are concerned that local infrastructure will not keep pace with the race to build ever more dwellings and more congestion and pollution will be the result. The Plan is almost silent on the future requirements in our nurseries, schools and college education. There is no mention of Grantham Hospital or of having adequate level of provision in doctors’ surgeries and dental care. Of course the local council does not have the responsibility in these matters but we hope that all our councillors will continue to use their voices to influence these important aspects of the local infrastructure.

Courtney Finn

Chairman, Grantham Civic Society

Date: 16 November 2020  
Our ref: 330170  
Your ref: None



Roger Ranson  
Head of Planning Policy  
planningpolicy@southkesteven.gov.uk

Dear Mr Ranson

**Planning consultation:** South Kesteven District Council Local Plan Review - Issues and Options Report

Thank you for your consultation on the above dated 08 October 2020 which was received by Natural England on 08 October 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the Issues and Options Report of the South Kesteven Local Plan (the Plan).

We agree that most of the current policies and proposals of the Plan adopted in January 2020 are operating well in supporting decision making on planning applications. Therefore, it is likely that most policies will not be subject to substantial change. However, there will be national policy changes with the forthcoming Environment Bill (setting a legislative framework to deliver the 25 Year Environment Plan) which should be anticipated.

Natural England submits the following comments in consideration to our statutory purpose as stated above.

**PROPOSAL 1 - 2036 Vision for South Kesteven**

**QUESTION 1a – The Vision**

**Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.**

Yes

**QUESTION 1b – The Vision**

**Do you consider that the current Vision is enough to deal with climate change and the economic recovery of the District? If not, please provide details.**

The importance of the Plan in helping to deliver government targets across all policy areas with regard to UK climate change action should be stated as part of the wider vision for development planning and management of South Kesteven.

**PROPOSAL 2 - Objectives**

**QUESTION 2 - Do you agree that the Objectives should remain the same for the new plan? If not, please provide details.**

Objective 13 relating to Climate Change should be strengthened. It should commit to achieving any current target set by government for carbon reduction.

**PROPOSAL 3 – Policies not proposed to be changed significantly**

**QUESTION 3 – Policies not proposed to be changed significantly**

**Q3 – Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not, please provide details.**

Natural England has considered ENV1, ENV2 and ENV3 for the purposes of this question and review. Whilst we agree with the content of these policies we suggest that they should be strengthened to reflect the aims of the 25 year environment plan and the forthcoming Environment Bill. We have the following comments.

**ENV1 Landscape Character**

The South Kesteven Landscape Character Assessment (2010) has been used by the Council to inform its Landscape Policy. The need for a review of this study is recommended together with considering the current position of neighbouring districts position with regards to landscape character assessments and polices to ensure conformity across borders.

**ENV2 Protecting Biodiversity and Geodiversity**

The Environment Bill contains a proposal to mandate net gains for biodiversity on new developments in England to deliver an overall increase in biodiversity. Many developers have already embraced this concept in prior to the introduction of legislation. Natural England therefore recommends that the Plan should include wording to refer to this proposed change (and the advantages of adopting it now) and which will offer guidance to developers to follow the net gain approach and demonstrate that a net gain in biodiversity can be achieved within future projects.

In particular policy wording should explain that net gain should be “measurable”. It would therefore be useful if the Defra metrics could be mentioned within the policy wording itself or the explanatory text. The Defra Biodiversity Metric 2.0 can be used to measure gains and losses to biodiversity resulting from development and is a fully tested metric that will ensure consistency across the plan-area.

We also advise that a specific target for Biodiversity Net Gain should be set which developments must achieve. Any target should be achievable, and evidence based. Your authority may want to consider including a target within a Supplementary Planning Document on Biodiversity Net Gain which would be a good way to offer developers further advice on this topic and can be updated as guidance from the Environment Bill emerges.

**ENV3 Green Infrastructure**

Natural England supports the current policy as we consider that it provides a sound framework for the protection and enhancement of the Green Infrastructure (GI) network. However we suggest that it could further emphasise of the importance of green infrastructure to health and well-being. The current Covid situation has shown how valuable it is to have access to green space close to where people live.

The policy wording should also establish that Green Infrastructure (GI) should be used to provide a

biodiversity net gain for development and cross reference made to ENV2 Biodiversity & Geodiversity.

We suggest that the policy should also consider the benefits of GI where climate change adaptation might include the creation of space for wildlife to enable it to move in response to changing environmental conditions.

#### **4. Possible policies to be changed or introduced**

##### **PROPOSAL 10 – Climate Change**

Natural England considers that this policy should be strengthened to reflect the Council's own commitment to climate change mitigation and means of delivering it. We consider that higher standards should be sought from development proposals including both nature-based solutions and improved building standards. Nature-based solutions such as green roofs and walls, SuDs, street trees, and providing increased connectivity between fragmented areas of habitat can help to build up resilience to climate change. Sustainable building techniques should be used in all new development. Whilst we accept that the requirement for higher energy performance standards might cost more to deliver, it should be recognised that the continuous development and availability of technology in this field has and will become more widely accessible.

##### **QUESTION 10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan enough to meet current and future challenge of climate change? If not, please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

Development is a major contributor to the UK's carbon emissions. The Climate Change Act 2008 sets targets that require greenhouse gas emissions to be reduced by at least 80% by 2050 compared to 1990 levels. The policy needs to more strongly state the Council's commitment to the national (and international) drive to cut carbon emissions, in line with its declared Climate Change Emergency. The policy needs to ensure that planning delivers future developments that are low carbon with development proposals including measures to demonstrate how they will reduce carbon emissions.

##### **QUESTION 14 – Any Other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Defra and Natural England are bringing together partners, legislation and funding, to create the Nature Recovery Network (NRN). Together they will deliver the NRN by restoring and enhancing England's wildlife-rich places.

##### **Nature Recovery Network**

The Nature Recovery Network (NRN) will be a national network of wildlife-rich places which aims to expand, improve and connect these places across our towns, cities and countryside. The NRN is a major commitment in the government's 25 Year Environment Plan and part of the forthcoming Nature Strategy. It will be a major tool in addressing biodiversity loss, climate change, flood risk management, whilst improving human health. The government is encouraging all public bodies to incorporate the NRN into all terrestrial spatial plans. The NRN cross cuts across several policy areas including green infrastructure; climate change and the reduction of carbon; protecting biodiversity and landscape. It also will help sustain vital ecosystems such as improved soil, clean water and clean air.

Natural England recommended this is dealt with as a separate policy, or cross referenced in appropriate policies.

If you have any queries relating to the advice in this letter, please contact me on [REDACTED]

Yours sincerely

**SANDRA CLOSE**  
**Planning Adviser**  
**East Midland Team**



For Official Use Only:

REF: SK.IAO.0011

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		
First Name		
Last Name		
Organisation	Long Bennington Parish Council	
Address	████████████████████ ██████████████	
Postcode	██████	
Telephone	██████████	
Email Address	████████████████████████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
Jane Evans	16/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	X	Unsure	
If not please provide details.					
Long Bennington Parish Council opposes this wording, which seems to effectively undermine the requirement for sites to have been properly allocated and considered. LB has been subject to a disproportionate number of development proposals, including outstanding permissions for over 30 houses in addition to those currently under development, which have or would put a					

substantial strain on infrastructure such as education and drainage and would go against the requirements of the Adopted Neighbourhood Plan.  
Clarification of what SKDC regard as "compromising the nature and character"?

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No		Unsure	
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If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	X	Unsure	
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If not, please provide details of what changes you think should be made.

Long Bennington Parish Council opposes this wording, which seems to effectively undermine the requirement for sites to have been properly allocated and considered. LB has been subject to a disproportionate number of development proposals, including outstanding permissions for over 30 houses in addition to those currently under development, which have or would put a substantial strain on infrastructure such as education and drainage and would go against the requirements of the Adopted Neighbourhood Plan.

Clarification of what SKDC regard as "compromising the nature and character"?

Proposal 5 advises that further surveys of settlement facilities and services will be undertaken. Despite numerous comments over the years, SKDC continues to state LB has a regular/good bus service between Newark and Grantham. This is arguably incorrect. Local Plan should say "accurate and up to date surveys will be undertaken"

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

If LSCs have 10% of the overall new housing there should be a fair and reasonable spread across the 15 LSCs.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

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**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	X	No		Unsure	
-----	---	----	--	--------	--

Please give details

The PC agrees with the need to include parking restrictions in planning permissions to prevent unplanned on-street parking in and around new developments. However, this should include a requirement to have restrictions if specific and appropriate parking is not provided.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0012

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Ms	
First Name	Beverly	
Last Name	Mawson	
Organisation		
Address	<p>██████████</p> <p>██████████</p> <p>██████████</p>	
Postcode	██████████	
Telephone	██████████	
Email Address	██████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	16/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	X	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	X
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	x	No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	x
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

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**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

--------------

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

Only if it covers all of South Kesteven

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	x	No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	x
-----	--	----	--	--------	---

If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	--------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	x	Unsure	
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Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	x	No		Unsure	
-----	---	----	--	--------	--

Please give details

A lot of households (possibly even the majority of households) have access to more than one vehicle and with new roads/access routes getting narrower there is more demand for off-road parking for residents.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**



Our ref: JB51457  
M: [REDACTED]  
E: [REDACTED]  
Date: 16<sup>th</sup> November 2020

Roger Ranson  
Head of Planning Policy  
South Kesteven District Council  
Council Offices  
St Peter's Hill  
Grantham  
NG31 6PZ

**Submitted by email**

Sent by email to: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk); [r.ranson@southkesteven.gov.uk](mailto:r.ranson@southkesteven.gov.uk)

Dear Roger,

**Representation to South Kesteven Local Plan Review (2041)  
– Issues & Options Consultation and Call for Sites 2020  
Land at Market Deeping, Lincolnshire  
On Behalf of The Rathbone Trust**

I write on behalf of Bidwells' client, The Rathbone Trust, in response to South Kesteven District Council's Issues & Options Consultation and Call for Sites 2020 which forms part of the Council's Local Plan Review (2041).

Our client has interest in land at: Land West of Peterborough Road, Market Deeping – allocation DEP1-H1: Towngate West (SKLP254); and Land West of Linchfield Road, Market Deeping – allocation DEP1-H2: Linchfield Road (SKLP253), both in the South Kesteven District Council Local Plan 2011-2036 (adopted January 2020).

This representation letter sets out our client's response to questions in the Issues & Options Consultation including some of the questions as set out in the document. I have enclosed with this letter a completed Call for Sites form.

Overall, we are supportive of the Council's decision to commence a review of the adopted Local Plan in accordance with Policy M1 and national planning policy and guidance.

Question 1a – The Vision: We are agreement with the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level subject to an appropriate assessment of growth to help inform the spatial strategy for the District. We are in agreement that The Deepings will have further developed its distinctive market town role, and planned growth will take place through new developments under the existing allocations in the adopted Local Plan.

Question 2 – Objectives: We are supportive of Objective 6 which seeks to enhance the role and function of The Deepings as a market town (alongside other market towns of Stamford and Bourne). We note that Objective 10 seeks to ensure that new residential development includes a mix and range of housing types which are suitable for a variety of needs and it is considered that our client's land can assist in meeting this objective through the existing allocations in the adopted Local Plan.

[REDACTED]  
[REDACTED]

Question 3 – Policies not proposed to be changed significantly: We are in agreement that Policy DEP1: The Deepings Residential Allocations of the adopted Local Plan does not need to change significantly insofar as establishing the principle of our client's land for future development and within the development settlement boundary of Market Deeping and Deeping St James.

Our client owns the land identified under the allocated sites DEP1-H1: Towngate West (SKLP254) and DEP1-H2: Linchfield Road (SKLP253) in the adopted Local Plan. The sites are available for development and our client is committed to bring forward residentially-led development and/or residentially-led mixed use development.

We suggest that the policies in the new Local Plan should allow for the quantum of units identified in the existing allocations to come forward but also allow for flexibility should other development uses come forward for either of the sites alongside residential development.

Question 4 – Plan Period: We are supportive of the Council's decision to extend the plan period of the Local Plan from the adopted position of 2036 to the year 2041. The Council's timetable for the review of the Local Plan anticipates examination from 2024 and adoption of the Plan by January 2025.

Should the Council adopt the Plan by January 2025, then the strategic policies will look ahead over a minimum 15-year period from adoption which is in accordance with paragraph 22 of the National Planning Policy Framework (NPPF, 2019). Should adoption of the Plan be delayed beyond January 2025, we suggest that the Council should consider a plan period extending beyond 2041.

Question 5a – Settlement Hierarchy: We are in broad agreement that the settlement hierarchy should be retained in the new Local Plan.

Question 6 – Housing Need and Requirement: It is considered that the housing need and requirement in the new Local Plan should be reflective of an appropriate robust assessment of the Local Housing Need figure for South Kesteven at the time of adoption of the Plan.

Question 7b – Stamford, Bourne and The Deepings: We are in agreement that The Deepings should remain as a focus for growth and our client's land under the existing allocations at sites DEP1-H1: Towngate West (SKLP254) and DEP1-H2: Linchfield Road (SKLP253) has the ability to assist in ensuring that an appropriate level of growth can be met.

Should you have any queries in respect of my client's representation, please do not hesitate to contact me. My contact details are included in the letterhead. Alternatively, I look forward to receiving your written confirmation of receipt of this representation and I look forward to receiving notification of all future stages of the Council's Local Plan Review (2041).

Yours sincerely,



**Robert Love MRTPI**  
Principal Planner, Planning

**Encl. Completed Call for Sites forms – DEP1-H1 & DEP1-H2**

For Official Use Only:

REF: SK.IAO.0014

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

## South Kesteven District Council Local Plan Review Regulation 18 Issues and Options Consultation Response Form Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

### **How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

### **Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

### **The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	mr	
First Name	john	
Last Name	dickie	
Organisation	John dickie associates	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone	[REDACTED]	
Email Address	[REDACTED]	

**Please note:** that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	<p>I DO wish to be on the database</p>

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
John Dickie	16-11-2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	yes	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	no	Unsure	
If not please provide details.					
<p><b>There must be engagement with planning professionals - time to get the 'Planning Forum' up and running again. As things stand currently, to many far reaching planning policy decisions are being made without due engagement with those of us at the sharp end of putting projects together and navigating the planning system. There needs to be a clear message that SKDC is 'open for business' not just from Members but from Officers too.</b></p>					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No	no	Unsure	
If not please provide details.					
<p><b>See above comments</b></p>					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	Absolutely not	Unsure	

If not please provide details.

Current Policy H2: Affordable Housing Contributions

***All developments comprising 11 or more dwellings (or greater than 1000m2 gross floorspace) should make provision for 30% of the scheme's total capacity as affordable housing, except within the urban area of Grantham as defined on the Policies Map where the affordable housing requirement on such developments will be 20%.***

This Policy is at odds with the NPPF which says this ;

63. Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.

A major planning application being:

- The creation of 10 or more residential units.
- Residential development of on a site of 0.5 hectares or more (where the number of residential units is not yet known i.e. for outline applications)
- Non-Residential development or change of use on a site of at least 1 hectare
- Creation of change of use of 1000 square metres or more of gross floor space (not including housing)

**The conflict and the setting of a 'threshold' at odds with the NPPF disadvantages SME house builders and therefore detrimental to growth, employment and the delivery of homes.**

This Policy needs to be changed to align with the NPPF

It is also counterproductive for the adopted plan (in relation to Exception Policies) to only consider such sites to be suitable for 'affordable housing' - C2 uses must also be included to promote employment generating uses such as Care Homes.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

**Yes**

**No**

**no**

**Unsure**

**If not please provide details**

**This is 'moot' date given that there are now almost constant reviews to ALL Local Plans. A perfect case in point is the SKDC Local Plan adopted just 8 months ago and already under a review!!!!**

## 9. Proposal 5 – Settlement Hierarchy

### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	no	Unsure	
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If not, please provide details of what changes you think should be made.

Further consideration to be given to villages that have been excluded from the 'sustainable village' definition - Castle Bytham being a case in point

### Q5b – Settlement Hierarchy Methodology

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

Further consideration to be given to villages that have been excluded from the 'sustainable village' definition - Castle Bytham being a case in point

### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	yes	No		Unsure	
-----	-----	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

The garden village at Grantham is good ambition but infrastructure delays seem to be underestimated plus - will there be demand?

Consider something closer to Stamford as 'demand' would be more likely thus attracting private investment for enabling works

## 10. Proposal 6 – Housing Need and Requirement

### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No	no	Unsure	
If not, what evidence do you have to justify an alternative need and requirement?					
The SKDC land supply has just been reduced and is only just over 5 years - it may not even reach 5 years in reality given the over optimistic deliverability for the larger sites - see above					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
Do you agree that Grantham should remain as the focus for growth in South Kesteven?					
Yes		No	no	Unsure	
If not, please provide details and any alternative proposals.					
See above - re-focus on stamford					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?					
Yes	yes	No		Unsure	
If not, please provide details and any alternative proposals.					
<p>I strongly disagree with the idea of having the (currently non-existent) Bourne Neighbourhood Plan 'allocate' land for development. This is not only 'novel' but will also stifle growth. Allocations must be made by the LPA.</p> <p>By way of an example, the 15 acre site to the West of the end of Beaufort Gardens should have been allocated in the current Local Plan as was originally envisaged.</p> <p>Given the reduction in SKDC's housing land supply, Bourne allocations must be revisited and the aforementioned site allocated for development.</p> <p>It is also counterproductive for the adopted plan (in relation to Exception Policies) to only consider such sites to be suitable for 'affordable housing' - C2 uses must also be included to promote employment generating uses such as Care Homes.</p>					
<b>Q7c – Larger Villages</b>					
Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?					
Yes	yes	No		Unsure	
If not, please provide details and any alternative proposals.					

See above comments on the settlement hierarchy - the selection/qualifying process is too constraining

#### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	no	Unsure	
-----	--	----	----	--------	--

If not, please provide details and any alternative proposals.

Both routes through to the delivery of housing should be properly explored at the Plan Making stage - allocation AND windfall sites

#### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	yes	No		Unsure	
-----	-----	----	--	--------	--

Please provide details

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

### 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

#### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	unsure
-----	--	----	--	--------	--------

If yes, please provide details.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	yes	No		Unsure	
If not, please provide details.					
<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?					
Yes	yes	No		Unsure	
If not, please provide details.					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
Yes		No	no	Unsure	
If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.					
SKDC needs policy support for developments that are 'off grid' irrespective of scale					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?					
Yes		No		Unsure	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes		No		Unsure	

Please give details.

Code 4 does not exist any more. Leave this to the Building regs but create 'eco house' policy encouragement fr 'off grid' houses.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

See above - the planning system is NOT suited to become involved in forcing higher than Building Reg standards onto house builders - Leave this to the Building regs but create 'eco house' policy encouragement.

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	no	Unsure	
-----	--	----	----	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	yes	No		Unsure	
-----	-----	----	--	--------	--

Please give details

Long overdue!

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**time to get the 'Planning Forum' up and running again.**

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

No comment

**Thank you for responding to this consultation.**

This document: <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

Copy of the Local Plan: <http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=24267&p=0>



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

For Official Use Only:

REF: SK.IAO.0015

CN:

ADD:

## South Kesteven District Council Local Plan Review Regulation 18 Issues and Options Consultation Response Form Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

### **How to respond:**

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Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	A	
Last Name	KELLY	
Organisation		
Address	████████████████████ ████████	
Postcode	████████	
Telephone		
Email Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████	

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven				
Q1a – The Vision				
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?				
Yes		No X		Unsure

**If not please provide details.**

Broad and general statements give no assurances and details of how you will provide for necessary upgrades in services which this continuing expansion will require.  
The only thing we can be sure of is expansion.

**Q1b – The Vision**

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?**

Yes		No	x	Unsure	
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**If not please provide details.**

No.  
Allowing developers to build buildings that do not meet the SK climate emergency agenda is disingenuous. State clearly what your minimum standards are.  
  
Your vision of an increase in growth in older population of 60% so build for it is a fete a compli.  
  
Your first measure should be to plan for economic growth and prosperity, support this with your policies and promote economic growth, this will then change the demographic you need to build for and your policies should be geared to this. You have talked about better town centres in places like Bourne and supporting a developing local retail economy, but representations never acknowledge that the A15 carves our town in half, unnerves our pedestrians our main shopping street becomes the AI when it is closed and diverted here. Acknowledge the issues and then plan to mitigate for them in your Bourne specific policies.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

**Do you agree that the Objectives should remain the same for the new plan?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not please provide details.**

Yes as far as they go, but Grantham centric as always. Let's see all 4 major towns with specific policies addressing their individual needs and the commissioning of research to identify SWOT in all of the 4 major areas you are determined to develop without the resources they so often need.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not please provide details.**

Only if this includes the role of the NP and BTC and the people of Bourne in the allocation of housing sites in Bourne to 2036.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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**If not please provide details**

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
------------	--------------------------	-------------------------------------	--------------------------	---------------	--------------------------

**If not, please provide details of what changes you think should be made.**

**In fact it should be retained exactly and not meddled with to raise ONLY THE ALLOCATION TO BOURNE (was 7%), and lower it to Grantham and everywhere else.**

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
------------	--------------------------	-----------	--------------------------	---------------	--------------------------

**If not, please provide details of what changes you think should be made.**

**Have you commissioned work to find out if some smaller as well as larger villages would find it helps viability to expand?**

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
------------	--------------------------	-----------	--------------------------	---------------	--------------------------

**If so, please outline any suitable and deliverable proposals.**

**WHERE?**

--

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

You seem to overlook specific types of accommodation in your allocations, the dwellings should meet the needs of people.

### 11. Proposal 7 – Distribution of Growth

#### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

Yes Grantham should have its 53%

#### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

See previous comments re villages.

Bourne has delivered 30% of your housing since 2011, its has not received compatible infrastructure growth. Services are burdened and broken. Government may have to rethink its growth in housing plans.

#### Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

‘where there a range of available services and facilities? ‘

Available services suggests that they can be appropriately accessed by residents when needed is that true?

Have you actually found out if any villages welcome expansion?

#### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No X		Unsure	
-----	--	------	--	--------	--

If not, please provide details and any alternative proposals.

Windfalls are always selective and do not reflect a range of housing types and demographics. Elitist living.

### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

Please provide details

People before developers.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

### 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

#### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

Not aware. We have no show people since the annual Fair was taken from us by SKDC

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

The major role of this authority should be to balance employment growth in towns with housing allocations. We should not exist merely to service cities like Peterborough

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

Innovate and develop employment opportunities as a priority, not increase housing.

### 14. Proposal 10 – Climate Change

#### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future

**challenge of climate change?**

**Yes**

**No**

**Unsure**

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

They only work if you insist developers stick to them when they apply for planning.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

**Yes**

**No**

**Unsure**

**X**

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

**Yes**

**No**

**Unsure**

**X**

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

**Yes**

**No**

**Unsure**

Please give details

Do you mean caravan storage or living in mobile homes?

Do you mean sites for travellers?

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	X	No		Unsure	
-----	---	----	--	--------	--

Please give details

New developments need to more adequately provide for off road vehicle parking and safe pavements, better non vehicle connectivity links which promote walking and cycling over the motor vehicle. Reasonable access for emergency vehicles and visitors. How not to do it: Bath Close, Holloway Ave, Gilpin Close Bourne.

#### 18. Any other Comments

##### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Include in your policies commitment to the role of Bourne’s Neighbourhood Plan / Town Council and Residents in choosing where houses will go to 2036.

Do not ignore them again and allocate sites to the west of Bourne and close to the Bourne Woods where over 400 people previously objected.

#### Part C: Sustainability Appraisal Scoping Report

#### 19. Comments about the Sustainability Appraisal Scoping Report

Thank you for responding to this consultation.

Send to

[planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

or post to

Planning Policy  
SKDC  
Council Offices  
St Peter’s Hill  
Grantham, Lincolnshire  
NG31 6PZ

For Official Use Only:

REF: SK.IAO.0016

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Shaun	
Last Name	Sinnott	
Organisation		
Address	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 50px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px;"></div>	
Postcode	<div style="background-color: black; width: 60px; height: 15px;"></div>	
Telephone	<div style="background-color: black; width: 100px; height: 15px;"></div>	
Email Address	<div style="background-color: black; width: 150px; height: 15px;"></div>	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 100px; height: 15px;"></div>	

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

**Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?**

<b>Yes</b>		<b>No X</b>		<b>Unsure</b>	
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**If not please provide details.**

Broad and general statements give no assurances and details of how you will provide for necessary upgrades in services which this continuing expansion will require. The only thing we can be sure of is expansion.

**Q1b – The Vision**

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?**

<b>Yes</b>		<b>No x</b>		<b>Unsure</b>	
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**If not please provide details.**

Your first measure should be to plan for economic growth and prosperity, support this with your policies and promote economic growth, this will then change the demographic you need to build for and your policies should be geared to this. You have talked about better town centres in places like Bourne and supporting a developing local retail economy, but representations never acknowledge that the A15 carves our town in half, unnerves our pedestrians our main shopping street becomes the A1 when it is closed and diverted here. Acknowledge the issues and then plan to mitigate for them in your Bourne specific policies.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

**Do you agree that the Objectives should remain the same for the new plan?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>X</b>
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**If not please provide details.**

Let's see all 4 major towns with specific policies addressing their individual needs and the commissioning of research to identify SWOT in all of the 4 major areas you are determined to develop without the resources they so often need.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please provide details.**

**Only if this includes the role of the NP and BTC and the people of Bourne in the allocation of housing sites in Bourne to 2036.**

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes X</b>					
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**If not please provide details**

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes X</b>					
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**If not, please provide details of what changes you think should be made.**

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

<b>Yes X</b>					
<b>If so, please outline any suitable and deliverable proposals.</b>					

<b>10. Proposal 6 – Housing Need and Requirement</b>					
<b>Q6 – Housing Need and Requirement</b>					
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, what evidence do you have to justify an alternative need and requirement?</b>					
the dwellings should meet the needs of people.					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
Do you agree that Grantham should remain as the focus for growth in South Kesteven?					
<b>Yes X</b>					
<b>If not, please provide details and any alternative proposals.</b>					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details and any alternative proposals.</b>					
Bourne has delivered 30% of your housing since 2011, its has not received compatible infrastructure growth. Services are burdened and broken.					
<b>Q7c – Larger Villages</b>					
Do you agree that it is still appropriate to plan for a level of housing growth across the Larger					

**Villages within South Kesteven where there a range of available services and facilities?**

**Yes X**

**If not, please provide details and any alternative proposals.**

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

**Yes**

**No**

**Unsure**

**If not, please provide details and any alternative proposals.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

**Yes**

**No**

**Unsure**

**Please provide details**

**People before developers.**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

**No X**

**If yes, please provide details.**

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

				Unsure	
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If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

				Unsure	
--	--	--	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

				Unsure	
--	--	--	--	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

				<b>Unsure</b>	
--	--	--	--	---------------	--

**Please give details.**

--

**Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

**Please give details**

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

**Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

		<b>No</b>			
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**Please give details**

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

<b>Yes</b>					
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**Please give details**

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<b>18. Any other Comments</b>
<b>Q14 – Any other Comments</b>
<b>Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?</b>
<b>Include in your policies commitment to the role of Bourne’s Neighbourhood Plan / Town Council and Residents in choosing where houses will go to 2036.</b>

**Part C: Sustainability Appraisal Scoping Report**

<b>19. Comments about the Sustainability Appraisal Scoping Report</b>

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0017

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

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Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Mrs	
<b>First Name</b>	Gaile	
<b>Last Name</b>	McMillan	
<b>Organisation</b>		
<b>Address</b>	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 60px; height: 15px;"></div>	
<b>Postcode</b>	<div style="background-color: black; width: 80px; height: 15px;"></div>	
<b>Telephone</b>	<div style="background-color: black; width: 100px; height: 15px;"></div>	
<b>Email Address</b>	<div style="background-color: black; width: 180px; height: 15px;"></div>	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
Gaile McMillan	17 11 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	Generally	No		Unsure	
If not please provide details.					
Housing growth levels needs to be considered along with employment and amenities					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No NO		Unsure	
If not please provide details.					
More needs to be followed to avert the climate change which we are all currently experiencing eg flooding in Bardney and other areas of Lincolnshire					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No No		Unsure	
If not please provide details.					
The objectives here are very broad. A need for greener energy, more energy efficient housing needs to be included. If the proposal is 754 pa then these need to be energy efficient					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	YES	No		Unsure	
If not please provide details.					

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<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
<b>Do you agree with the proposed plan period up to 2041?</b>					
<b>Yes</b>	<b>YES</b>	<b>No</b>		<b>Unsure</b>	
<b>If not please provide details</b>					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
<b>Do you think the Settlement Hierarchy should be retained in the new Local Plan?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>UNSURE</b>
<b>If not, please provide details of what changes you think should be made.</b>					
<b>Q5b – Settlement Hierarchy Methodology</b>					
<b>Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>UNSURE</b>
<b>If not, please provide details of what changes you think should be made.</b>					
<b>Q5c – New Settlement</b>					
<b>Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>UNSURE</b>
<b>If so, please outline any suitable and deliverable proposals.</b>					

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No	NO	Unsure	
-----	--	----	----	--------	--

**If not, what evidence do you have to justify an alternative need and requirement?**

I am unaware of what the figure of 754 pa is based upon and on a 21 year period until 2041 this would give a housing growth of 15,834 – based on % a small village would have an increase of 633 homes, and could possibly increase the size by 5 fold over the period of time taking away valuable farming land. Lincolnshire is a farming community historically.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	YES	No		Unsure	
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**If not, please provide details and any alternative proposals.**

Provided this does not become the only growth area and it is proportioned

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	UNSURE
-----	--	----	--	--------	--------

**If not, please provide details and any alternative proposals.**

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	UNSURE
-----	--	----	--	--------	--------

**If not, please provide details and any alternative proposals.**

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	YES	No		Unsure	
-----	-----	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	YES	No		Unsure	
-----	-----	----	--	--------	--

Please provide details

See points made in 1a

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

Gypsy/Traveller/Travelling showpeople – Aware of need to accommodate but understand from local media that there is adequate provision to meet needs

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	UNSURE
-----	--	----	--	--------	--------

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	UNSURE
-----	--	----	--	--------	--------

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	NO	Unsure	
-----	--	----	----	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

More needs to be followed to avert the climate change which we are all currently experiencing eg flooding in Bardney and other areas of Lincolnshire

I am unaware of what the figure of 754 pa is based upon and on a 21 year period until 2041 this would give a housing growth of 15,834 – based on % a small village would have an increase of 633 homes, and could possibly increase the size by 5 fold over the period of time taking away valuable farming land. Lincolnshire is a farming community historically.

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**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	YES	No		Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	YES	No		Unsure	
-----	-----	----	--	--------	--

Please give details.

See comments made for Q10
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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

See comments for Q10

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	UNSURE
-----	--	----	--	--------	--------

Please give details

SKDC – Grantham – caravan site along Gorse Lane not aware of other issues in this area

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No NO		Unsure	
-----	--	-------	--	--------	--

Please give details

Parking is always an issue – local needs need to be taken into consideration, eg disable and more recently with Govt announcements of date for electric cars by 2030 – this will mean more electric charging points and to be included in housing developments, to encourage economic growth and support of climate change policies

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Thank you for all your hard work during these difficult times

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

--

**Thank you for responding to this consultation.**



For Official Use Only:

REF: SK.IAO.0018

CN:

ADD:



**SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL**

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

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Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	MR	MR
First Name	Robert	Stephen
Last Name	Jenkinson	Short
Organisation		Escritt Barrell Golding
Address	[REDACTED]	
Postcode		
Telephone		
Email Address		

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
Stephen Short  on behalf of Mr R A Jenkinson	17 November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					

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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes <input checked="" type="checkbox"/>		No		Unsure	
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

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**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	<input checked="" type="checkbox"/>
-----	--	----	--	--------	-------------------------------------

If so, please outline any suitable and deliverable proposals.

--

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes       No      Unsure

If not, what evidence do you have to justify an alternative need and requirement?

--

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes       No      Unsure

If not, please provide details and any alternative proposals.

--

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes      No      Unsure     

If not, please provide details and any alternative proposals.

--

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes       No      Unsure

If not, please provide details and any alternative proposals.

--

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	<input checked="" type="checkbox"/>
-----	--	----	--	--------	-------------------------------------

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	<input checked="" type="checkbox"/>
-----	--	----	--	--------	-------------------------------------

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

--

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	<input checked="" type="checkbox"/>
-----	--	----	--	--------	-------------------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	<input checked="" type="checkbox"/>
-----	--	----	--	--------	-------------------------------------

Please give details.

--

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

-

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes

No

Unsure

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes

No

Unsure

Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

The focus of new development in Grantham and the larger villages is supported.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

The report is comprehensive and the questions appear well focused .The appraisal findings in respect of growth in the Larger Villages in relation to the nine SA themes are supported. In particular Great Gonerby whilst being a Larger Village also has the advantage of being readily accessible to Grantham and the A1 and as such would be a logical location for growth.

**Thank you for responding to this consultation.**

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REF: SK.IAO.0019

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ADD:



SOUTH  
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DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
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Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Tom	
Last Name	Clarke MRTPI	
Organisation	Theatres Trust	
Address	████████████████████ ████████	
Postcode	████████	
Telephone		
Email Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████████████████	17/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	X	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	X	No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	X	No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	X
If not please provide details.					
For enhanced protection of South Kesteven’s valued facilities and greater policy robustness Policy SP6.b might be revised to refer to need rather than viability. Viability can be manipulated when considered on a financial basis, for example a facility may not be ‘viable’ on a commercial					

basis but could operate successfully under an alternative model such as community or charitably owned.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	X	No		Unsure	
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If not, please provide details of what changes you think should be made.

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Yes		No		Unsure	
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Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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Yes		No		Unsure	
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If yes, please provide details.

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If not, please provide details.

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Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

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**Q10 – Climate Change Policies**

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Yes		No		Unsure	
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Yes		No		Unsure	
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Please give details.

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Please give details

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**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

--

**18. Any other Comments**

**Q14 – Any other Comments**

--

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

--

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0020

CN:

ADD:



SOUTH  
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COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name		Nigel
Last Name		Gough
Organisation	Trustees of the Richard Bettinson Will Trust	Nigel Gough Associates Ltd
Address	[REDACTED]	[REDACTED]
Postcode		[REDACTED]
Telephone		[REDACTED]
Email Address		[REDACTED]

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	17 <sup>th</sup> November, 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No	x	Unsure	
If not please provide details.					
<p>Having read and re-read the Vision, planning and planners must realise that they are unable to properly and reasonably facilitate some of the Aims within this Vision Statement simply because they do not have the money and the tools to do so and that much has to be provided by the private sector through business initiatives. It is these business initiatives that planners and planning should seek to initiate and enhance as simple bland policies are really not effective. Land Allocation and development control are the simple tools in the control of planning, unless they take on the economic and development role for their authorities.</p> <p>In terms of Bourne, this should say that the planned growth for housing should continue to be targeted to the east of the town, adjoining the settlement where you can properly justify the sustainable extension to the town centre and links to the adjoining development for the period up to 2041.</p>					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	X	Unsure	
If not please provide details.					
<p>In terms of the economic recovery of the district, our comments above in 1a are pertinent here that the district needs to find and promote a more structured response to assisting business within the district and particularly as an aftermath to the effects that Covid has had in 2020. These new initiatives are vital and need to be backed by proper resources from the district and full support from businesses and the business organisations within the district.</p>					

<b>6. Proposal 2 – Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	x	No		Unsure	
If not please provide details.					
<p>There needs to be a new objective based upon the need for new promotional business initiatives for the district as a whole as related to the above statements from us.</p>					

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

<b>Yes</b>		<b>No</b>	<b>x</b>	<b>Unsure</b>	
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**If not please provide details.**

There are a number of Policies, particularly in the Housing section, which should be properly reviewed in the light of changing government advice and also as a reaction to market requirements and market locations. It is too easy to hide behind old Policies rather than exploring properly today's needs and tomorrow's requirements.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	X	No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No	x	Unsure	
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If not, please provide details and any alternative proposals.

It does appear as though Grantham and the focus on it for the future is totally disproportionate to the focus on Stamford, Bourne and the Deepings. Frankly, there should be a better distribution and Grantham should have a reduced percentage and the settlement of Stamford increased along with increases for Bourne and the Deepings. The latter two becoming substantial towns now worthy of a greater percentage.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No	x	Unsure	
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If not, please provide details and any alternative proposals.

See answer to 7a above. There is no rational justification why Bourne and the Deepings should have different levels of proposed growth. This will only, over time, exacerbate differences whereas they should have the same levels of growth and at a higher level, ie 10% each.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
If not, please provide details.					
<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?					
Yes		No		Unsure	
If not, please provide details.					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
Yes		No		Unsure	
If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?					
Yes		No		Unsure	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes		No		Unsure	
Please give details.					
<b>Q11c – Viability Implications of Higher Energy Performance Standards</b>					
If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?					

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes

No

Unsure

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes

No

Unsure

Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

Thank you for responding to this consultation.

For Official Use Only:

REF: SK.IAO.0021

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

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## Part A: Personal Details

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Stewart	
Last Name	Patience	
Organisation	Anglian Water Services Ltd	
Address	██████████ ██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
Email Address	████████████████████	

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## 4. Please Sign and date this form

Signature (please type for an electronic response)	Date
Stewart Patience	17 <sup>th</sup> November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	X	Unsure	
If not please provide details.					
There are a number of district wide policies which are of relevance to Anglian Water as follows:					

- Policy EN4: Pollution Control
- Policy EN5: Water Environment and Flood Risk Management
- Policy ID1: Infrastructure for growth

Anglian Water is general supportive of the above policies and agrees that there is no need to make significant changes to policies EN4 and ID1. We would make the following comments in relation to Policy EN5:

We consider that there is a need to go further in relation to water efficiency in new residential development in combination with other non-planning related actions. Anglian Water has recommended to Government that 100 litres/per person/per day should be the minimum that should be achieved within the Anglian Water company area given the current and future availability of water resources and is seeking changes to existing national water efficiency standard together with other water companies.

The existing optional higher water efficiency standard for residential development which appears in policy EN5 should be retained subject to any future changes at the national level. (Please refer to Defra consultation personal consumption and the Government’s response to the consultation when available). Reference should also be made to water re-use measures including surface water and rainwater harvesting and grey water recycling and promoting the use of such so that developments reduce water consumption further and the impact on existing sewerage infrastructure.

We would ask that Anglian Water is fully involved in the development of any replacement policy or policies which would replace the above policies in advance of formal consultation.

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
<b>Do you agree with the proposed plan period up to 2041?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not please provide details</b>					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
<b>Do you think the Settlement Hierarchy should be retained in the new Local Plan?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details of what changes you think should be made.</b>					

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	X – see comment
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**If not, please provide details and any alternative proposals.**

A continued focus on Grantham would have a greater impact on water supply and sewerage infrastructure and Marston Water Recycling Centre and more limited impacts elsewhere in the plan area.

Currently a range is presented for the housing capacity to be identified in the Local Plan Review. As such there is a need to consider further the implications for existing water supply and water recycling infrastructure.

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>X – see comment</b>
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**If not, please provide details and any alternative proposals.**

A continued focus on Stamford, Bourne, and the Deepings would have a greater impact on water supply and sewerage infrastructure and the receiving Water Recycling Centres for these settlements and more limited impacts elsewhere in the plan area.

Currently a range is presented for the housing capacity to be identified in the Local Plan Review. As such there is a need to consider further the implications for existing water supply and water recycling infrastructure.

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>X – see comment</b>
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**If not, please provide details and any alternative proposals.**

A continued focus on the larger villages as defined would have a greater impact on water supply and sewerage infrastructure and the receiving Water Recycling Centres for these settlements and more limited impacts elsewhere in the plan area.

Currently a range is presented for the housing capacity to be identified in the Local Plan Review and the settlements to be included as larger villages is to be revisited. As such there is a need to consider further the implications for existing water supply and water recycling infrastructure

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

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**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

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Yes		No		Unsure	
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If yes, please provide details.

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**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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**If not, please provide details.**

#### **14. Proposal 10 – Climate Change**

##### **Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

Water resources: climate change increases the risk of extreme weather events, posing a serious threat to the water sector. UK climate projections suggest we'll get less rainfall in the summer yet experience more intense rainfall events which increase the risk of flooding within the public sewerage network. The Climate Change Committee has also highlighted risks to the water supply.

Opportunities for a more holistic and integrated approach to water management should be included in the plan, to encourage multi-functional water management assets which support other community objectives. This approach combines different elements of water management (e.g. combining SuDS with a water re-use system to both manage runoff and provide an alternative non-potable water supply) together with town planning and design (e.g. integrating the planted SuDS features throughout a development to contribute to 'greener' streetscapes).

#### **15. Proposal 11 – Energy Performance Standards**

##### **Q11a Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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##### **Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**Please give details.**

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Anglian Water as a business is committed to reaching net zero for operational emissions by 2030. As part of which we are looking to develop more renewable energy from both wind and solar so that 44% of the energy we need is from renewable sources by 2025.

Policy RE1 of the current adopted Local Plan sets out criteria for both wind and solar energy but not identify specific areas which will be focus for future renewable energy development. We would ask that consideration be given to identifying specific areas for this purpose in the Local Plan Review.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0022

CN:

ADD:



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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Cllr	
First Name	Adam	
Last Name	Brookes	
Organisation	N/A	
Address	██████████ ██████████ ██████████	
Postcode	██████	
Telephone	██████████	
Email Address	████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
If you do not wish to be added or would like your details to be removed, then please select the following box	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	17 November 2020

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

7. Proposal 3 – Policies not proposed to be changed significantly					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

--

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

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**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

----------------------

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

I would note that the allocation DEP-E1 on Peterborough Road, Market Deeping, currently appears unlikely to be deliverable in the short/medium term. A reserved matters application for the site (S18/1547) remains to be determined, with no updated documents received since it was submitted and a cover letter from the developer indicating there has been little actual interest in such a development.

I would therefore suggest that the employment allocation should be deleted and instead the site considered as a potential housing allocation. There remains employment allocations for an extension of the Northfields Industrial Estate in Market Deeping.

#### 14. Proposal 10 – Climate Change

##### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

Existing policy ID2 should be updated to refer specifically to the recently published Local Transport Note (LTN) 1/20 relating to cycle infrastructure design and to expect its standards to be met in any new development. This will provide a good way of assessing that development proposals provide high quality cycling provision.

ID2 policy is though appropriate where it seeks to increase demand for public transport and as described regarding proposal 13, it would be inappropriate to erode this through setting minimum parking standards which will not assist in dealing with the challenges of climate change which, no matter what emissions from vehicles, require greater adoption of sustainable travel.

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

##### Q11b – Energy Performance Standards in Non-Residential Development

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

Yes		No		Unsure	x
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**Please give details.**

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**Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

**Please give details**

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

**Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

Yes		No		Unsure	x
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**Please give details**

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

Yes		No	x	Unsure	
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**Please give details**

**I strongly oppose any introduction of minimum levels of parking within developments in the updated local plan. This risks literally building in ongoing car dependency for the lifetime of the development.**

Such a policy would seem entirely inconsistent with the existing ID2 policy which seek to generate demand for public transport, and other policies which seek to consider the implications of climate change and the need to promote more sustainable development.

As per policy ID2, new development provides the perfect opportunity to influence behaviour much more easily than could be achieved in existing development.

Problems with the inappropriate parking of vehicles should be dealt with via appropriate parking restrictions and enforcement. The planning authority should ensure that where undesirable parking can be anticipated, developer contributions are secured to fund traffic regulation orders to introduce double-yellow lines or similar.

The public interest is served by promoting public transport and reducing reliance on private vehicles. That should be the priority here, not mostly the private interest of future residents having the ability to store their private property on the public highway without impediment.

#### 18. Any other Comments

##### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

### Part C: Sustainability Appraisal Scoping Report

#### 19. Comments about the Sustainability Appraisal Scoping Report

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0023

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
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**This form has three parts**

**Part A** is for your personal details

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**Part C** is your response to the Sustainability Appraisal Scoping Report

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**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

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## Part A: Personal Details

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Steve	
Last Name	Beard	
Organisation	Sport England	
Address	██████████ ██████████████████ ██████████████	
Postcode	██████████	
Telephone	██████████████	
Email Address	██████████████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

## 4. Please Sign and date this form

Signature (please type for an electronic response)	Date
██████████	18/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No	x	Unsure	
If not please provide details.					
The vision should not only reemphasise the quality of life but should also support the creation of healthy communities both in terms of new development and regeneration/improvement of existing.					
This can be developed by creating active environments and using Active Design in development.					
Sport England, in conjunction with Public Health England, has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government’s desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:					
<a href="http://www.sportengland.org/activedesign">http://www.sportengland.org/activedesign</a>					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No	x	Unsure	

**If not please provide details.**

**Objective 10 and 11 should be strengthened to deliver the health outcomes in the vision**

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

<b>Yes</b>		<b>No</b>	<b>x</b>	<b>Unsure</b>	
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**If not please provide details.**

**Policy OS1 - does not reflect NPPF in terms of paras 96 and 97 the emphasis of this policy is on the provision of open space. The provision of formal playing field based on standards – see comments below. The protection of playing fields should be based on appropriate evidence.**

**Policy SP6 promotes protection of community services and facilities what about the promotion of new - positive planning (with evidence) para 92 NPPF.**

**For example – how does the adopted plan deal with the replacement/relocation of The Deepings Leisure Centre?**

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

**11. Proposal 7 – Distribution of Growth**

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Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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Yes		No		Unsure	
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If yes, please provide details.

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**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

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Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

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**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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<b>Q11a Energy Performance Standards in Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?					
Yes		No		Unsure	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes		No		Unsure	
Please give details.					
<b>Q11c – Viability Implications of Higher Energy Performance Standards</b>					
If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?					
Please give details					

<b>16. Proposal 12 – Need for Caravan Accommodation</b>					
<b>Q12 – Need for Caravan Accommodation</b>					
Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.					
Yes		No		Unsure	
Please give details					

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**Please give details**

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**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Sport England would raise a concern that the comments made in July 2018 (and before) and reiterated below appear to have been largely ignored

The Open Space Studies 2009 and 2017 are not considered to represent a robust and up to date assessment of needs for sports facilities and opportunities for new provision in line with the requirements of NPPF paragraph 73.

A full assessment of needs for sports facilities is required, that follows a robust methodology to identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities.

The evidence base that is currently being relied upon is dated 2009, is now almost 10 years old and based on out of date methodology to produce standards rather than planning for specific needs which NPPF Paragraph 73 requires.

For sports facilities, including playing fields, demand and catchments for facilities with will vary across different sports and sustainable and effective delivery could, for example, involve a large multi-pitch facility or facilities that serve a wide catchment. Applying a ‘standards based’ approach does not align with this, as existence of a large multi-pitch in a specific locality would not necessary mean that all demand is being met, and similarly an area without provision within walking distance may still be adequately served in respect of some sports because users travel to a ‘central venue’ that provides for the needs, say, of a whole town for certain sports.

Application of hectarage per 1000 population does not readily translate into the different forms of provision required for specific sports, and a locality that has a high concentration of provision over and above a quoted standard may still be the most strategically appropriate place to focus

further investment and expanded capacity to meet existing, and also additional needs generated by development, as it may be not be practicable or sustainable to deliver walkable facilities for all sports throughout the local plan area. Also, an area that has a hectareage that exceeds the quoted standard may still represent a deficiency in provision if the format of facilities does not match demand, or if demand in any event exceeds the notional standard being applied.

In other areas, there may be no/very low demand and provision below the quoted standard may not represent a deficiency. In such circumstances, requiring facilities to be delivered to achieve the standard would not be justified.

It is for the above reasons that specific needs for sport must be identified (as opposed to generic standards) so that they can be adequately planned for and the evidence then used to underpin policies for the protection, enhancement and provision of sports facilities (i.e. SP6, OS1 and ID1).

Carrying out of a robust and up to date assessment of needs for sports facilities to identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities, which can then be used to underpin relevant local plan policies.

Sport England has published methodology for the above and, as indicated in previous representations on earlier consultations, would be willing to have further dialogue about this with a view to identifying a positive way forward.

#### **Part C: Sustainability Appraisal Scoping Report**

#### **19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0024

CN:

ADD:



SOUTH  
KESTEVEN  
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COUNCIL

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	Jacqui	
Last Name	Bunce	
Organisation	NHS Lincolnshire	
Address	██████████ ██████████ ██████████	
Postcode	██████████	
Telephone		
Email Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	18 <sup>th</sup> November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	Yes	No		Unsure	
If not please provide details.					
The NHS is working to meet the needs of the local population as set out in the current plan. The more certainty there is in planning terms, the more helpful the planning documents are to other partner organisations					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	X
If not please provide details.					
There is an opportunity to recognise that the pandemic has changed the way we work and the economy of the district.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	X	No		Unsure	
If not please provide details.					
The focus on health and wellbeing as one of the key objectives is welcomed					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	x	No		Unsure	
If not please provide details.					

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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

Having certainty regarding planned growth is helpful for partner organisations in their strategic planning. Specific site details will need to be reviewed on a case by case basis.

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**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

If so, please outline any suitable and deliverable proposals.

I would like to understand this option further before I was able to make a considered judgement

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<b>10. Proposal 6 – Housing Need and Requirement</b>					
<b>Q6 – Housing Need and Requirement</b>					
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?					
Yes		No		Unsure	x
If not, what evidence do you have to justify an alternative need and requirement?					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
Do you agree that Grantham should remain as the focus for growth in South Kesteven?					
Yes	x	No		Unsure	
If not, please provide details and any alternative proposals.					
Yes as it has some of the infrastructure to support this. This needs to be in the context of improved road links, reduction in traffic congestion in the town. It will need additional power and utilities to support the planned growth.					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?					
Yes	x	No		Unsure	
If not, please provide details and any alternative proposals.					
<b>Q7c – Larger Villages</b>					
Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?					

Yes		No		Unsure	x
-----	--	----	--	--------	---

If not, please provide details and any alternative proposals.

As long as quality impact assessments are undertaken and there is the infrastructure to support these proposals

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

Any “windfall” sites need to be reviewed on their merits and against and parish, local plans that have been developed. There needs to be the relevant infrastructure to support these sites.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	x
-----	--	----	--	--------	---

Please provide details

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	x
-----	--	----	--	--------	---

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

**If not, please provide details.**

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

**If not, please provide details.**

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

**Whilst reducing car use is commendable, there must be an impact study on these plans to ensure that rural communities are not disadvantaged. Likewise any new developments need to assess accessibility to services and the impact of poor public transport before car accessibility is significantly reduced. House builders should be encouraged to use modern methods and bring forward high quality sustainable homes to reduce carbon footprint of developments and the costs for residents going forward.**

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
Please give details.					
Best practice for the type of development should be the aspiration					
<b>Q11c – Viability Implications of Higher Energy Performance Standards</b>					
If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?					
Please give details					

<b>16. Proposal 12 – Need for Caravan Accommodation</b>					
<b>Q12 – Need for Caravan Accommodation</b>					
Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
Please give details					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>

**Please give details**

Please see previous response regarding accessibility and not disadvantaging any groups of residents

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**



[planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Our ref: ~~USE01000~~  
Your ref: PL00718702

Telephone [REDACTED]

19 November 2020

Dear Mr Ranson

**re: Sustainability Appraisal (SA) Scoping Report for the South Kesteven Local Plan Review**

Thank you for consulting Historic England on the above

Historic England's responsibilities, as the Government's adviser on the historic environment, include the protection and management of England's historic assets. In planning terms, this role includes providing advice to ensure that statute and national policy, particularly in the National Planning Policy Framework (NPPF), are reflected in local planning policy and practice. Historic England is consulted on Local Plans under the provisions of the Town and Country Planning (Local Development) (England) Regulations 2004.

Notwithstanding the advice given in this letter, we reserve the right at a later stage to comment or object to any proposals that come forward. We recommend that the Authorities Conservation Officer and County Archaeological Advisor should be consulted in relation to all sites. We have the following initial comments.

Please note that Historic England have published advice notes. They may be of relevance to the update of the Local Plan. Specifically, Historic Environment Good Practice Advice Note 1: The Historic Environment in Local Plans and Historic Environment and Good Practice Advice Note 3: The Setting of Heritage Assets may be of particular interest to you and may provide additional information in relation to our answers to your consultation questions below. These can be accessed via the following link:

<https://www.historicengland.org.uk/advice/planning/planning-system/>

Historic England has also published a document relating to site allocations in Local Plans – this covers all types of allocation and sets out a site selection methodology in relation to heritage assets. We consider this may be of use to you, and the document can be downloaded from:

[REDACTED]

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.





<http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Guidance in relation to Sustainability Appraisals can be found here:-

<https://historicengland.org.uk/images-books/publications/strategic-environment-assessment-sustainability-appraisal-historic-environment/>

Question 1a and b

The broad aims are supported, in particular the references to heritage throughout 2.2.

Proposal 1

Within the first paragraph of proposal 1, there is the opportunity to stress that character, local heritage and cultural assets make an essential contribution to the economy, such as attracting people to live and work in South Kesteven or the visitor economy for example. It is considered that this paragraph could be strengthened and broadened to focus on more than enjoyment for all. Historic England would be very happy to assist with wording.

Grantham – It is assumed that this refers to existing consented schemes and allocations only. Historic England would welcome early, informal consultation on any additional or amended proposed allocations.

The last paragraph presents the opportunity to reference the conservation and enhancement of heritage assets and their settings.

Question 2

Objective 12 should be updated to reference the 'setting' of heritage assets and 'non-designated heritage assets'. Historic England would be very happy to assist with wording.

Question 3

The retention of an Historic Environment policy such as EN6 and Landscape Character policy such as EN1 is welcomed, Historic England would be very happy to assist with wording for any future heritage policy.

Question 4

No comment at this stage.

Question 5

No comment at this stage. If the settlement hierarchy is proposed to change or additional and / or amended site allocations are proposed, early informal consultation is strongly encouraged.



Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.





Question 6

Referencing paragraph 4.16 and Quarry Farm, in Historic England’s response to the recent Rutland Local Plan submission stage consultation the following was submitted:-

*“There is no reference within paragraph 5.24 to the scheduled monument at Great Casterton. A criteria should be added to policy H4. The development will be harmful to the setting of the scheduled monument at Great Casterton (reference 1005067). The Scheduled Monument is a Roman town and fort, located on a crossroads and on the river valley. Control over landscape, including the views across an over the river valley – are part of the form, function and placement of this site. It is understood that the area of objection would be a country park (with no built development) in a future scheme coming forward, which would overcome Historic England concerns. This should be included within a policy criteria, as has been done for biodiversity, and shown on the allocation plan (as a ‘heritage buffer’ for example) As such, an amendment to criteria B to read “country park incorporating the appropriate mitigation of potential harm to biodiversity and wildlife assets, including the translocation of the notable species and the protection and enhancement of the scheduled monument at Great Casterton, as shown as a heritage buffer on the allocation map’ is suggested. “*

Question 7

No comment at this stage. If the distribution of growth is proposed to change or additional and / or amended site allocations are proposed, early informal consultation is strongly encouraged.

Question 8

Again, no comment at this stage. Historic England would encourage early, informal consultations for any additional site allocations.

Question 9

As above, no comment at this stage. If following the update of the Employment Land Study additional or amended site allocations are proposed, Historic England would welcome early, informal consultation.

Question 10 - 14

No comment at this stage

Overall, it would be helpful to provide greater reference to heritage throughout. If you have any queries about any of the matters raised above or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

[Redacted signature]

Emilie Carr (Mrs)  
Historic Environment Planning Adviser

[Redacted contact information]

[Redacted contact information]

[Redacted contact information]

[Redacted contact information]





SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website

<http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Robert	
Last Name	Batchelor	
Organisation		
Address	██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
Email Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

**If you do not wish to be added or would like your details to be removed, then please select the following box**

*Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.*

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	19/11/20

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details.

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes <input checked="" type="checkbox"/>		No <input type="checkbox"/>		Unsure <input type="checkbox"/>	
-----------------------------------------	--	-----------------------------	--	---------------------------------	--

If not please provide details.

Agreed, but Objective 10 cannot be met by the Local Plan. See Question 3

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?				
Yes		No <input checked="" type="checkbox"/>		Unsure

If not please provide details.

**Policy H4**

Policy H4 , Meeting All Housing Needs, where it relates to the elderly, merits a revisit as unachievable by the Plan. The Monitoring and Implementation Framework requires that revision be considered at the Local Plan Review.

The Plan, p.6, indicates that 21% of the District population is aged over 65, increasing by a further 60% by 2036. The District Housing Delivery Action Plan (Avison Young, 2019) cites the data as 22%, increasing to 31% by 2039. There is already a deficit in mass-market building for the elderly.

By Main Modification MM19, The Planning Inspector recommended "..... New housing proposals shall take account of the desirability of providing retirement accommodation, extra care and residential care housing and other forms of supported housing.....". However, he placed limits on the application of it, "It would not be necessary for major housing schemes to provide for retirement accommodation or extra care and residential care housing, but the policy should set a clear signal of policy support where these appropriately come forward".

Grantham is planned to take the major share of house-building in the District during the plan period but all presently identified schemes in the town are 'major housing schemes'. Is "taking account of desirability" in only small schemes a sufficiently robust policy to satisfy Government Guidance ? -

National Planning Policy Framework, para 61 -"..... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to ..... older people)"

Planning Practice Guidance - 'Housing For Older and Disabled People'. The first paragraph reads, "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking."

The rest of this document will repay study in reconciling the District Council's Policy H4 with it.

8. Proposal 4 –  
Plan Period  
Q4 – Plan  
Period  
Do you agree

with the proposed plan period up to 2041?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not please provide details</b>					

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details of what changes you think should be made.</b>					

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining

**larger Villages –  
is appropriate  
for this review?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please  
provide details  
of what changes  
you think  
should be  
made.**

--

**Q5c – New  
Settlement**

**Given the scale  
of housing  
growth to be  
provided in this  
Local Plan is  
there a case for  
amending the  
Settlement  
Hierarchy to  
include any  
proposal(s) to  
establish a new  
community on  
garden village  
principles?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If so, please  
outline any  
suitable and  
deliverable  
proposals.**

--

**10. Proposal 6 –  
Housing Need  
and**

**Requirement**  
**Q6 – Housing Need and Requirement**  
 Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not, what evidence do you have to justify an alternative need and requirement?

--

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**  
 Do you agree that Grantham should remain as the focus for growth in South Kesteven?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not, please provide details and any alternative proposals.

--

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not, please provide details.

--

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an

**updated  
Employment  
Land Study?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please  
provide details.**

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**14. Proposal 10  
– Climate  
Change**

**Q10 – Climate  
Change Policies**

**Are the existing  
policies in the  
adopted Local  
Plan sufficient  
to meet current  
and future  
challenge of  
climate change?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please  
provide details  
of what would  
be new or  
revised  
planning  
policies that the  
Council could  
consider  
through the  
review of the  
Local Plan.**

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**15. Proposal 11  
– Energy  
Performance**

**Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details.**

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
Please give details					

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**  
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

<b>Yes</b>		<b>No</b>		<b>Unsure</b>
<b>Please give details</b>				

<b>18. Any other Comments</b>
<b>Q14 – Any other Comments</b>
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

<b>19. Comments about the Sustainability Appraisal Scoping Report</b>

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0027

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

## South Kesteven District Council Local Plan Review Regulation 18 Issues and Options Consultation Response Form Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020

### **This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

### **How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

### **Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

### **The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Miss	
<b>First Name</b>	Keri	
<b>Last Name</b>	Monger	
<b>Organisation</b>	Environment Agency	
<b>Address</b>	<p>██████████</p> <p>████████████████████████████████████████</p> <p>████████████████████</p> <p>██████████</p>	
<b>Postcode</b>	██████████	
<b>Telephone</b>	██████████	
<b>Email Address</b>	<p>████████████████████████████████████████</p> <p>██████████</p>	

**Please note:** that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
Keri Monger	19 November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	
If not please provide details.					
No comments from the Environment Agency.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					
No comments from the Environment Agency.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No	X	Unsure	
If not please provide details.					
<p>Under the ‘Environmental: Protection and Enhancement of Environment’ objectives we would like to see the word “watercourses” or “rivers” in the same way trees and woodlands have been emphasised by name in Objectives 12,13 and 14. It would also be good at the objective level to include scarce water resources by specific wording as it is only mildly implied, and lack of water in South Kesteven is a real issue, more than most. We note that water resources are referred to in paragraph 4.35 (section 2), but emphasising at the objective level would be preferable.</p> <p>Objective 15 could be re-worded to encompass the environmental impacts of pollution, and not just the impact that it has on health and wellbeing.</p>					

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not please provide details.**

We support Objective 13 and the decision to not significantly change policy EN5 'Water Environment and Flood Risk Management'

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

No comments from the Environment Agency.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

No comments from the Environment Agency.

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

No comments from the Environment Agency.

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

Yes		No		Unsure	
<b>If so, please outline any suitable and deliverable proposals.</b>					
No comments from the Environment Agency.					

<b>10. Proposal 6 – Housing Need and Requirement</b>					
<b>Q6 – Housing Need and Requirement</b>					
<b>Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?</b>					
Yes		No		Unsure	
<b>If not, what evidence do you have to justify an alternative need and requirement?</b>					
No comments from the Environment Agency.					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
<b>Do you agree that Grantham should remain as the focus for growth in South Kesteven?</b>					
Yes		No		Unsure	
<b>If not, please provide details and any alternative proposals.</b>					
No comments from the Environment Agency.					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
<b>Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?</b>					
Yes		No		Unsure	
<b>If not, please provide details and any alternative proposals.</b>					
No comments from the Environment Agency.					
<b>Q7c – Larger Villages</b>					
<b>Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?</b>					
Yes		No		Unsure	
<b>If not, please provide details and any alternative proposals.</b>					
No comments from the Environment Agency.					
<b>Q7d – Other Settlements</b>					

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

No comments from the Environment Agency.

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please provide details**

No comments from the Environment Agency.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If yes, please provide details.**

No comments from the Environment Agency.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details.**

No comments from the Environment Agency.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details.**

No comments from the Environment Agency.

#### **14. Proposal 10 – Climate Change**

##### **Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

We would support any changes to the Plan which can improve upon water efficiency within South Kesteven. The Building Regulations optional higher water efficiency standard of 110 litres per person per day should be sought as a baseline to meet future challenges of climate change in relation to water resources.

#### **15. Proposal 11 – Energy Performance Standards**

##### **Q11a Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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##### **Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details.**

No comments from the Environment Agency.

##### **Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

**Please give details**

No comments from the Environment Agency.

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes

No

Unsure

**Please give details**

No comments from the Environment Agency.

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes

No

Unsure

**Please give details**

No comments from the Environment Agency.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Notes on the 'Interim SA Report to accompany Regulation 18 consultation on the Local Plan Review Issues and Options Report'**

Water

We support the SA objective to 'Manage South Kesteven's water resources in a sustainable manner'.

To ensure the proposed growth can occur in the areas served by Marston, Deepings and Little Bytham water recycling centres without a deterioration in the water quality of the area, the Plan will need to ensure that Anglian Water have suitable measures planned and assurance that these measures will be in place in time to deal with the increased flows from any planned development.

Growth in Grantham

'Continuing and increasing the focus of growth on Grantham through Option G1 and G2 increases the likelihood (and potential magnitude) of negative effects on biodiversity sites present in the vicinity of the town'. – We would agree with this statement, as proposed future growth within Grantham is likely to put additional pressure on the Upper Witham unless opportunities for environmental enhancements are considered from the outset.

Biodiversity Net Gain

We would welcome the Plan looking at increasing Biodiversity Net Gain (BNG) above the minimum measurable target of 10% for major development sites. We agree that Option NG2, 'Seek to deliver at least a 20% measurable biodiversity net gain on major development sites' should be the favoured option.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

Please see comments on the Sustainability Appraisal Scoping Report attached.

**Thank you for responding to this consultation.**

FAO: [REDACTED]

**Our ref:** AN/2020/130860/SE-  
01/SP1-L02

**Your ref:** [REDACTED]

<by email>

**Date:** 12 October 2020

Dear [REDACTED]

### **Sustainability Appraisal Scoping Report – South Kesteven Local Plan review**

Thank you for consulting us on the above Sustainability Appraisal (SA) Scoping Report on 25 August 2020 and agreeing to an extension until 13 October 2020.

We have reviewed the SA Scoping Report and have the following comments to make:

#### **Biodiversity and Geodiversity**

We are pleased to see the report makes reference to Biodiversity Net Gain (BNG) in the National Planning Policy Framework (NPPF). Local Plans produced and examined after 24 January 2019 must be compliant with the NPPF policies on net gain which includes achieving measurable net gains.

We are also encouraged to see the report makes reference to The 25 Year Environment Plan (25YEP). Alongside the ambitions of 25YEP we encourage reference be made on how the ambitions will be achieved. In particular Nature Recovery Network, enhancing Natural Capital and the mandating of BNG. In relation to the last point we encourage the report makes reference to The Environment Bill (currently going through Parliament) which will make BNG mandatory. We support the use of Biodiversity Metric 2.0 to measure BNG, along with expert ecologist advice.

The term "net gain" includes both BNG and Environmental Net Gain (ENG) using the Natural Capital Approach. A key principle of the 25YEP is to embed ENG in the planning system.

ENG builds on the BNG approach but in a more inclusive way recognising the broader benefits that carefully planned development can bring - for example natural flood management, recycling waste materials, carbon neutrality, and water efficiency. It's an approach that puts in place measurable improvements for the environment, whilst ensuring cost-effective, sustainable development. The aim of wider ENG is to reduce pressure on and overall improvements in natural capital, ecosystem services and the benefits they deliver.

Your appraisal should consider the requirements of paragraph 171 of the NPPF for plans to enhance natural capital and seek opportunities for wider environmental net gain

#### **Environment Agency**

Nene House (Pynchley Lodge Industrial Estate),  
Pynchley Lodge Road, Kettering, Northants, NN15 6JQ  
Email: [LNplanning@environment-agency.gov.uk](mailto:LNplanning@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

*Customer services line: 03708 506 506  
Calls to 03 numbers cost the same as calls to standard  
geographic numbers (i.e. numbers beginning with 01 or 02).*

Cont/d..

wherever possible. Opportunities for environmental gains, including nature based solutions to help adapt to climate change, include identifying opportunities for new multi-functional green and blue infrastructure.

We will support Local Planning Authorities who chose to embed wider natural capital and ENG approaches.

The Ministry of Housing, Communities and Local Government has published guidance which includes how plans should aim to identify opportunities for broadening to ENG.

<https://www.gov.uk/guidance/natural-environment>

### River Witham

We are fortunate in South Kesteven to have the Upper Witham and its tributaries. This section of river supports endangered native crayfish, brown trout and grayling. Despite historic modification it retains good habitat in places and there is the potential in many areas to restore it fully. There are pressures however, lack of water is a notable problem in drier summer months as are serious pollution incidents. Without action it will deteriorate and the diversity of ecology that it currently supports will be reduced. Proposed future growth within Grantham is likely to be put additional pressure on the Upper Witham unless opportunities for environmental enhancements are not considered from the outset.

The Witham Catchment Partnership has been evolving and delivering projects across this part of the catchment in recent years. Notably, there is the formation of the Grantham Urban Plan leading to the development of environmental improvement projects through the urban river corridor, which will be delivered over the next 3 years. This includes the South Kesteven District Council led Blue Green, ESIF funded project. In addition, there are further projects from the urban plan that could be taken forward and linked to future growth including additional river restoration and weir by-pass near the site of the proposed garden village to the south of the town.

Further project proposals for large scale floodplain reconnection, river restoration and fish barrier removal are being drawn up for the sections of the Witham from Colsterworth to Saltersford and on the Cringle Brook between Skillington and Stoke Rotchford village. Downstream of Grantham in the section to Aubourn, there is also potential to set back flood banks and recreate vital wetland habitat at appropriate locations. A similar large scale project is currently being developed at Manthorpe with a willing landowner.

By undertaking these projects and linking into future growth we can help provide beautiful green spaces and protect and enhance this important part of the catchment. In addition, we get further benefits including flood risk reduction and carbon storage, together with the improved health and wellbeing that a quality environment provides.

### Named projects

We have identified some opportunities for the delivery of BNG through environmental schemes we are involved with; these are summarised below. We would be happy to discuss these in further detail going forward. You may also wish to engage with the Lincolnshire Wildlife Trust, who may have some projects that are relevant to the Plan review.

#### River Gwash restoration project - Belmesthorpe to Newstead

This is an on-going and potential project to restore flow conveyance and brown trout habitat. Led by the Gwash Fishing Club and the Wild Trout Trust. Though

other partners may be involved.

#### The Gwash / Welland confluence wetland

Led by the Welland River Trust, the project is currently at design stage, and then funding will be sought to deliver it. It will be a benefit to biodiversity, water quality and flood risk by making space for water. The land has been donated by the landowner. It will also have public access which could fit into the health and wellbeing aspirations.

#### Stamford Millstream restoration

This is an on-going project with some already completed delivery. It is led by Stamford Town Council and the Welland Rivers Trust.

### **Air, Land, Soil and Water Resources**

#### Water resources

We welcome acknowledgement in paragraph 5.35 of the SA that water resources in the area are limited. We can confirm that the local authority is in a water stressed area. Therefore we would recommend that through the implementation of planning conditions, the Plan should require new dwellings to meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in building regulations part G2. This standard would help with minimising the risk of shortages as a possible effect of climate change.

#### Source protection zones

We would suggest the following is added to section 5.38:

The Environment Agency has prepared guidance on groundwater protection 'The Environment Agency's approach to groundwater protection' which sets out its approach to the management and protection of groundwater. The guidance is available at:

<https://www.gov.uk/government/publications/groundwater-protection-position-statements>

#### Mineral resources

We would suggest the following is added to section 5.40:

Brownfield land may be subject to contamination from previous uses, which can pose risk to surface water, human health and the wider environment. A risk management framework is available in the Land contamination: risk management guidance on GOV.UK, for use when dealing with land affected by contamination. The guidance is available at:

<https://www.gov.uk/guidance/land-contamination-how-to-manage-the-risks>

#### Water quality

The report suggests that considerable growth and development is expected in the future that will need to be treated at the Marston and Little Bytham Wastewater Treatment Works (WwTW). The phrasing appears to assume that the water company (Anglian Water Services) will be making improvements to its systems that will allow this development to be accommodated. Please note that historically there have been compliance issues at Marston WwTW.

Anglian Water Services (AWS) owns both of these WwTW. AWS's most recent Water Recycling Long-Term plan was published in September 2018. It provides information

on its long-term growth strategy and expected investment. Such plans can be subject to change and, in particular, where long term planning horizons are included, these can often be less certain/reliable.

The plan lists the proposed investments for Marston WwTW:

- AMP 7 (2020 - 2025) CSO improvements
- AMP 8 (2025 – 2030), AMP10 and AMP 11 Increased drainage

These investments are not confirmed and are not focussed on increasing the capacity of the works. A significant trade effluent output stopped recently which has given them more capacity for houses but further work is needed to ensure that appropriate upgrades are in place to accommodate the scale of development. It should also be noted that there is a proposal to close Allington WwTW and to pump away the effluent to Marston for treatment which would decrease the capacity for new development even further.

There are no proposed investments in the Little Bytham WwTW in the AWS Water Recycling Long-Term plan. There currently appears to be capacity at the works; however, it should be noted that the permit for the Little Bytham works is already very close to its technically achievable limit for phosphorus. This places restrictions on the capacity to accommodate flows from new developments as it restricts the options of possible upgrades that can be made to the works to increase capacity.

The most pressing issue for development in the Little Bytham sewage catchment is the sewerage network rather than the works itself. There are historic sewerage network flooding issues in this catchment going back at least 10 years. Most recently in 2019 AWS received a Local Enforcement Position (LEP) to allow temporary discharge or sewerage from Stoney Lane Pumping Station to the watercourse due to groundwater flooding of the sewerage network resulting from groundwater infiltration. This LEP required AWS to develop an Infiltration Reduction plan for the sewage catchment. It is our understanding that no development should go ahead until the Infiltration Reduction plan has been agreed and actions to repair and/or improve the system have been put in place.

To ensure that growth can occur in areas served by these sewage catchments without a deterioration in the Water Quality of the area, the Local Plan will need to ensure that AWS have suitable measures planned and assurance that these measures will be in place in time to deal with increased flows from further development.

We request that SEA objective 12 a) is amended to read: "Ensure that there is no deterioration to water quality, whilst supporting improvements consistent with the aims of the River Basin Management Plan.

### **Climate Change**

The report references the current South Kesteven Strategic Flood Risk Assessment (SFRA) Level 1 and 2 in section 6.18.

We support the statement in section 6.3 "Direct development away from areas at highest risk of flooding (whether existing or future). 'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'" This is the approach advocated in the National Planning Policy Framework and SEA objective 14 a), which supports the implementation of this statement, is welcomed.

If the Plan requires the latest Flood Zone 3b extents (functional floodplain) or other flood risk data a request should be submitted to our Customer and Engagement Team by

email on [REDACTED]

Natural England, the Environment Agency and the Forestry Commission have recently produced a shared vision to use nature-based solutions to tackle the climate and ecological emergency. This includes through delivering large-scale woodland planting in the right places, protecting and restoring peatlands, supporting farmers towards net zero, working with nature to manage flood risk, taking a strategic approach to land use, encouraging the use of less carbon intensive materials and pushing for action across the UK and abroad. You can read more here:

<https://www.gov.uk/government/news/environmental-bodies-set-joint-vision-to-tackle-climate-change>

### **Health and Wellbeing**

We aspire to assist the planning system to fulfil its potential to deliver sustainable growth, provide greater resilience and improve peoples' health and wellbeing.

We are very encouraged to see the report includes reference from 25YEP (section 8.6) of the physical and mental wellbeing benefits that the environment provides.

Natural England is developing the Ecometric (due to be published in 2020) to capture changes in ecosystem services values when delivering a BNG outcome. It has been designed for use in conjunction with the Biodiversity metric 2.0 to encompass the value of nature to people.

We look forward to working with you as the Local Plan review progresses, but should you require any additional information in the meantime, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

[REDACTED]  
[REDACTED]

Direct dial [REDACTED]

Direct e-mail [REDACTED]

For Official Use Only:

REF: SK.IAO.0028

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

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The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Phil	
Last Name	Hughes	
Organisation	Lincolnshire County Council	
Address	██████████ ██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
Email Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	17 November 2020

## Part B: Issue and Options Consultation Questions

### 5. Proposal 1 – 2036 Vision for South Kesteven

#### Q1a – The Vision

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

If not please provide details.

#### Q1b – The Vision

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	Unsure
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If not please provide details.

Will links to London be relevant or even desirable in a post COVID era? Regular long distance commuting into heavily congested cities might be a thing of the past. Should a more sub regional and local approach be adopted? Stamford refers to tangible benefits to local residents; could examples be provided as to what these benefits might be? Stamford also appears to be over reliant on A1 access and with a commitment to decarbonisation how will this be achieved?

It is too early to assess the long term impact of Covid 19 on the economy and any policy response. The post covid world is likely to be a different one if current changes to office working and commuting are maintained. There is a possibility of urban flight to rural areas where demand for more spacious and tranquil living is evidenced in recent post lockdown property transactions. In this scenario, there will be a much looser geographical connection between work and home (more frequently combined), resulting in spatial re-organisation with more demand for rural living and the re-purposing of city centre office accommodation. Whether these trends are continued needs to be assessed using locally tuned Strategic Housing Market Area Assessments (SHMAA) which have been used previously to prepare Local Plans.

### 6. Proposal 2 - Objectives

#### Q2 – Objectives

Do you agree that the Objectives should remain the same for the new plan?

Yes	Yes	No		Unsure	
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If not please provide details.

### 7. Proposal 3 – Policies not proposed to be changed significantly

#### Q3 – Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed

significantly?

Yes	Yes	No		Unsure	
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If not please provide details.

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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	Yes	No		Unsure	
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If not please provide details

<p>Yes – LCC will be updating the Transport Model in 2021-22 and it forecast years will add 2041 to the current 2031 and 2036 forecast years. This will correlate with the above proposal.</p>
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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	Yes	No		Unsure	
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If not, please provide details of what changes you think should be made.

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**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	Yes	No		Unsure	
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If not, please provide details of what changes you think should be made.

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**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	No	Unsure	
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	Yes	No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

In the recent Planning for the Future White Paper the Government has proposed a new standard method of calculating Local Housing Need. Lichfield consultants has provided the following information: <https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/#section11>

The current Local Plan = 645 dwellings per annum (dpa)  
Annual delivery (last 3 years) = 534 dpa  
Current standard method = 732 dpa  
Proposed new standard method = 839 dpa

There is clearly a significant shortfall between the current Local Plan target, recent delivery and both standard methods. However, the revised Local Plan target (754 dpa) is considered an ambitious but realistic attempt to meet local housing need.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	Yes	No		Unsure	
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If not, please provide details and any alternative proposals.

Yes – Grantham has the best transport provision and network infrastructure in the district i.e. the East Coast Mainline, the A1 and the new GSRR being constructed by LCC. This infrastructure is best placed to meet the demands of large growth within South Kesteven

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	Yes	No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	Yes	No		Unsure	
If not, please provide details and any alternative proposals.					
<b>Q7d – Other Settlements</b>					
Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?					
Yes	Yes	No		Unsure	
If not, please provide details and any alternative proposals.					
<b>Q7e – Consideration of the Market and Deliverability*</b>					
Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?					
Yes	Yes	No		Unsure	
Please provide details					

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

<b>12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation</b>					
<b>Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation</b>					
Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?					
Yes	Yes	No		Unsure	
If yes, please provide details.					
<p><b>The latest Gypsy and Traveller Accommodation Assessment for the South Kesteven District identifies a need for 32 additional residential pitches for Gypsies and Travellers and 9 additional plots for Travelling Showpeople between the period 2016 – 2036. The GTAA reports that of these numbers, 16 additional residential pitches for Gypsies and Travellers and 5 additional plots for Showpeople should be provided within the first five years of the Local Plan. Strengthening the GTAA findings are the steady number of unauthorised encampments that have occurred across the district in recent years totalling on average around 25 each year. Of those that have occurred on land belonging to or the responsibility of the County Council and visited by their Traveller Liaison Officer it was found that a high percentage of those Travelling groups were in fact families with local family ties wanting to remain and reside in the district but had no pitch to move on to. Often they were visited several times by the Traveller Liaison</b></p>					

Officer throughout the year having been moved on from one location to another throughout the district. It is noted that most of these families have their names on a pitch waiting list for the only local authority owned site in the South Kesteven Area. With low turn-over of pitches on the site, families are liable to be waiting up to several years for a pitch. In addition to those Traveller groups wishing to remain in the area, the region also receives transient Traveller groups stopping temporarily in the district for a variety of purposes but for limited time. Whilst not requiring permanent accommodation in South Kesteven, these groups do require temporary stopping or transit provision neither of which currently exists. Lack of provision can often result in groups attempting to stop at unsuitable locations which may lead to conflict with public authorities and the local settled community. There doesn't appear to be any available suitable land sites for either temporary or permanent provision for Gypsies, Travellers or Showpeople within the South Kesteven Area.

There is a concern that the Authority's Local Plan does not identify any suitable land for either future pitch or plot provision for the Travelling community. Ideally, there should be a five year supply of land for deliverable sites and for the rest of the duration of the Local Plan, land identified for developable sites. With the absence of identifiable land, it appears that the Authority is solely reliant on 'windfall' sites; land that has not been specifically recognised for accommodation provision of the Travelling community but may be granted planning consent if the application meets a set criteria. This strategy has its risks to both the local authority and applicant. The local authority has less control over the future shaping and development of its district and applicants run the risk of purchasing unsuitable land that won't pass planning scrutiny. There is already evidence of this with the last two planning applications for Traveller sites at Cold Harbour and Fulbeck having recently been refused and awaiting appeals despite the Authority's recognition for more Gypsy, Traveller and Showpeople accommodation.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	Yes	No		Unsure	
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If not, please provide details.

In general terms LCC would support the carrying forward of employment allocations and designated employment sites given their importance in providing suitable sites for waste management facilities and attracting new investment.

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	Yes	No		Unsure	
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If not, please provide details.

#### 14. Proposal 10 – Climate Change

##### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	Unsure
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

Becoming Carbon Neutral is going to be a real challenge. LCC would suggest stronger policies on reducing single occupancy car use; reducing travel demand and promoting shorter journeys that can be carried out by more carbon benign modes will be required. The upcoming LTP V will have to address this issue and improved integration with LTP and Local Plan policy will help. References to EV charging points and requirements on new development to be carbon neutral upon completion may also be useful. More stringent application of Travel Plans to contain genuine options for greater travel would also help. LCC would recommend production of an SPG with clearly identified targets for modal shift and a tool kit of measures expected. Leeds City Council has produced such a document as has East Riding Council.

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	Yes	No		Unsure	
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##### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	Yes	No		Unsure	
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Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**LCC suggests SKDC consult the Central Lincolnshire Local Plan Team who have commissioned research into the additional cost of higher energy performance in residential buildings.**

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	No	Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No	No	Unsure	
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Please give details

**LCC does not consider that minimum parking standards are helpful in delivering development. The amount of parking provision depends very much on location, travel demand, provision of alternative modes. For example, the amount of parking required in central Grantham, Manthorpe and Baston are completely different and creating appropriate parking standards that reflect the many different areas of the District would be too complex. LCC recommends that minimum parking guidelines are provided and these acknowledge that different parking levels may be required in different areas.**

## 18. Any other Comments

### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

LCC notes that Historic Environment policies are amongst the list of those policies excluded from this Issues and Options exercise. There is not much to say in this respect. However, LCC would like to make a general point which probably relates best to question 7 within the consultation document. Question 7 is about the focus of development within the key settlements of Grantham, Stamford, Bourne and The Deepings. LCC would like to make the point to SKDC, that we are working with Historic England on the Extensive Urban Survey which will result in a historic characterisation report for each of the four 'towns'. We have completed The Deepings and our work has fed into their Neighbourhood Plan. We have also done the central area of Grantham in response to a request to feed into the High Street Heritage Action Zone. LCC would hope that SKDC will take account of this additional evidence when determining planning outcomes in the towns of their district. Each report and its supporting data will be made freely available to SKDC.

It is noted that a 'call for sites' process is under way, however details do not appear to have been provided in terms of the proposed site assessment methodology. For the avoidance of doubt the site assessment process should ensure that due consideration is given to the relevant proposals and policies set out in the adopted Lincolnshire Minerals and Waste Local Plan (LMWLP), including those that:

- Safeguard minerals and waste sites from incompatible development;
- Safeguard Mineral Resources to prevent unnecessary sterilisation by development; and
- Identify the locational criteria and allocations for future minerals and waste development.

The LMWLP is comprised of two parts, the Core Strategy and Development Management Policies, and the Site Locations document. Both can be found on the County Council's website: [www.lincolnshire.gov.uk/planning](http://www.lincolnshire.gov.uk/planning)

Any submitted sites that have the potential to affect safeguarded mineral resources and/or minerals and waste sites should be subject to meaningful assessment in accordance with the relevant Policies of the LMWLP, in order to determine whether it would be appropriate for proposed sites to be allocated in the new Plan, and/or whether any mitigation measures would be necessary to ensure the acceptability of sites proposed for allocation.

## Part C: Sustainability Appraisal Scoping Report

### 19. Comments about the Sustainability Appraisal Scoping Report

N/A

Thank you for responding to this consultation.

Our Ref: P1419/JP  
Date: 20<sup>th</sup> November 2020

Planning Policy  
South Kesteven District Council  
Council Offices  
St Peters Hill  
Grantham  
Lincolnshire  
NG31 6PZ

**EMAIL:** [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Dear Sirs/Madam

**South Kesteven Local Plan Review – Issues and Options Consultation  
Response by Barberrry Grantham Ltd.**

Harris Lamb Planning Consultancy ('**HLPLC**') are instructed by Barberrry Grantham Ltd. ('**Barberrry**') to submit representations to the South Kesteven Local Plan Review – Issues and Options consultation. Barberrry are promoting land at Great Gonerby on the northern edge of Grantham for residential development and were actively involved in the preparation of the current Local Plan that was adopted earlier this year, having submitted representations and subsequently participated at the Local Plan Examination. Barberrry consider that the land at Great Gonerby is suitable for residential development and could deliver in the region of up to 450 dwellings to help meet the housing needs of Grantham and the wider District in the period up to 2041. Our comments to the Issues and Options consultation should be read this objective in mind. Please see our detailed responses below to the questions posed in the consultation document.

**QUESTION 1a – The Vision**

**Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.**

Yes, we are content that the Vision for the emerging Plan should be broadly the same as that of the existing Plan but to be updated to reflect the plan period and higher housing requirement. The Plan was only adopted in early 2020 and in our view there have not been any material changes in circumstances that make the stated vision obsolete or out of date. As such, we are content to proceed on the same basis. Specifically, we welcome the emphasis on strengthening Grantham's role as the Sub-Regional Centre through significant new housing and employment growth.



**QUESTION 2 – Objectives**

**Do you agree that the Objectives should remain the same for the new plan? If not please provide details.**

Yes, in a similar way to our response to 1a above in that we are broadly content for the Objectives to remain the same as previously stated but updated where necessary to reflect the higher housing growth that is now required. We specifically support Objectives 5, 6, 9, 10 and 11.

**QUESTION 3 – Policies not proposed to be changed significantly**

**Q3 – Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.**

On the whole we generally agree with the list of policies that are not proposed to be changed. The only exception to this is Policy GR3 Grantham Residential Allocations. You may recall that during the previous Local Plan Examination Barberry were concerned about the deliverability of two of the Council's preferred SUEs to the south of Grantham and whether they would be able to deliver housing in sufficient quantities at the correct time to meet the Council's objective of meeting 50% of the Council's housing needs in Grantham. Our key concern relating to the two SUEs was the need to deliver significant new infrastructure in the form of the Grantham Southern Relief Road. Whilst the Inspector was ultimately convinced that the two SUEs were deliverable it remains to be seen whether in fact that they will deliver housing as expected. If not, Barberry contend that there will be a need to identify other additional housing allocations in Grantham that could contribute to the delivery of housing in the short term whilst the larger SUEs are coming on stream. Policy GR3 therefore, needs to be kept under review in case the other housing allocations in Grantham are not delivering and if not, additional sites will be needed to be identified.

Furthermore, the policy will need to be updated to reflect the additional allocations that will be needed anyway to reflect the higher housing requirement that the Council will have to meet through the Plan Period.

**QUESTION 4 – Plan Period**

**Do you agree with the proposed plan period up to 2041? If not please provide details**

We welcome the intention to extend the Plan Period to 2041. Paragraph 22 of the Framework states that Strategic Policies should look ahead over a minimum 15 year period from the date of adoption. As the emerging Plan is unlikely to be adopted any earlier than 2024 we consider it the correct approach to extend the length of the Plan beyond the minimum 15 year time frame.

**QUESTION 5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.**

Yes, we agree that the current Settlement Hierarchy should be retained in the new Local Plan. As Barberry's land interests are focussed on Grantham and Grantham is at the top of the Settlement Hierarchy we see no reason to change this and that Grantham should continue to be the focus for the majority of new housing and employment development in the District.

**QUESTION 5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles? If so, please outline any suitable and deliverable proposals.**

No, we do not believe there is a case for amending the Settlement Hierarchy to include any proposals to establish a new community based on garden village principles. In light of our previous concerns raised during the last Local Plan Examination where we questioned whether the inclusion of two large SUEs to Grantham was the correct approach to deliver the housing needs of the town, principally in the early part of the Plan Period, we do not consider that the identification of a new community would be the best way of delivering housing to meet the significant increase in the housing requirement that the new Plan will have to address. Barberry remain of the view that the most efficient way of delivering new housing for Grantham is on proposed SUEs located on the edge of the town that are not heavily dependent on the provision of new infrastructure to service them. The land at Great Gonerby is one such location that can fulfil this objective thereby contributing new housing in the early part of the Plan Period.

**QUESTION 6 – Housing Need and Requirement**

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?**

Notwithstanding the fact that the Council adopted its current Local Plan with a housing requirement significantly lower than the standard method figure that it is now required to accommodate, we welcome the fact that a higher housing requirement is now to be delivered in the District. Furthermore, the recent consultation that the Government undertook on revisions to the standard method indicated that the housing requirement for South Kesteven could be as high as 839 dwellings per annum. Clearly, no decisions have yet been made as to what if any revisions to the standard method will be adopted but what is clear is that the housing requirement will increase to as a minimum of 754 dpa but potentially even higher to somewhere nearer 839 dpa. The Council have acknowledged that even if the housing requirement increases to 754 dpa this will necessitate the identification of additional housing sites in order to deliver this level of growth. Barberry, therefore, reiterate the availability of the land at Great Gonerby as a potential housing allocation that is free from technical, physical or environmental constraints and which is not dependent on significant new infrastructure in order for it come forward for development.

**QUESTION 7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals.**

Yes, we agree that Grantham should remain the focus for growth in South Kesteven. As the Sub-Regional Centre, it is entirely appropriate that the majority of new growth should be directed to the largest and most sustainable location in the District. Furthermore, Grantham has the greatest range of employment opportunities and the ability to expand these, and in doing so, balance new employment provision with new housing. In addition, the town has the largest retail and service offering in the sub-region which again reinforces the need to support this by directing further development to the town. Similarly, the town's location on the East Coast Mainline train line means it is accessible to both the north and south by public transport, whilst it also had good road links due to the proximity of the A1. In light of the relative

sustainability of the town, we consider it wholly appropriate that Grantham should remain the focus for new housing and employment growth over the Plan Period.

**QUESTION 7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Barberry previously argued at the last Local Plan Examination that the Council's strategy of directing two large SUEs to the south of the town could have the effect of saturating that particular housing market within the town and in doing so, this could actually slow down the delivery of new housing. To avert this outcome, Barberry suggested that in order to try and increase the rate and delivery of housing, an additional site, such as the one they are promoting at Great Gonerby, should be allocated for development as well as this would increase the choice of new homes by developing in a different part of the town. This would increase market choice for purchasers and in doing so, would help maintain market demand thus enabling more houses to be constructed across the two different locations. Barberry remain of the view that by allocating land for development at Great Gonerby this would complement the existing housing allocations in the adopted Local Plan and help increase the levels of housing delivery across the town as a whole, thereby helping to meet the Council's identified housing needs and boosting the supply of housing.

**QUESTION 11a – Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

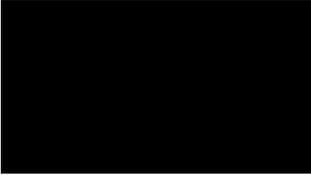
No. Energy performance standards should be as per the current Building Regulations. There is no need to duplicate control over this matter particularly where Building Regulations are continually being updated in order to deliver better environmental standards. We do not see the need for such a policy or requirement in the Local Plan where it is effectively covered elsewhere by a well established and effective system of control.

**QUESTION 14 – Any Other Comments Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

We made reference in our response to Question 3 about Policy GR3 and its reliance on large SUEs to deliver new housing in Grantham. Whilst the allocation of these sites was confirmed following the adoption of the Local Plan Barberry remain concerned that if these sites do not deliver as expected then this could have an adverse impact on the Council's supply of housing, which would be further exasperated by the significant increase in housing that will be required through the use of the standard method. In order to avert these potential pitfalls, we would urge the Council to take a proactive stance in seeking to advance its Local Plan in a timely manner in order that the new Plan can be adopted, thereby providing certainty going forward. Barberry are willing to work in a proactive manner with the Council to help achieve this outcome and would welcome a meeting with Officers to discuss their land interests at Great Gonerby and how these could help meet the development needs of the Council over the Plan Period. If you would be amenable to a virtual meeting in the first instance we would be happy to circulate some dates for this.

Should you require any further detail or have any questions then please do not hesitate to contact me.

Yours sincerely



**JOHN PEARCE**  
**Associate**



Tel: 

Cc M Cartwright – Barberry

For Official Use Only:

REF: SK.IAO.0030

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>		Mrs
<b>First Name</b>		Emma
<b>Last Name</b>		Walker
<b>Organisation</b>	The Roberts Family	Phase 2 Planning and Development Ltd
<b>Address</b>	██████████ ██████████ ██████████	██████████ ██████████ ██████████ ██████████
<b>Postcode</b>	██████████	██████████
<b>Telephone</b>	██████████	██████████
<b>Email Address</b>	██████████	████████████████████

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
Emma Walker on behalf of Phase 2 Planning and Development Ltd	09/11/20

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
The vision for growth is broadly supported and is considered to represent a sustainable approach to the distribution of development across the District.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

7. Proposal 3 – Policies not proposed to be changed significantly					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

Our clients wish to support policy LV-H2 which allocates and south of Wilsford Lane, Ancaster for development. This allocation falls within their control and will be coming forward for development during the Plan period.

## 8. Proposal 4 – Plan Period

### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

Extending the Plan period from 2036 to 2041 enables the Council to anticipate and respond to long term requirements and opportunities, as identified in the NPPF (paragraph 22). If the end date was not extended beyond 2036, by the time the Plan is adopted, it's strategic policies would not meet the NPPF requirement to look ahead over a minimum 15 year period.

## 9. Proposal 5 – Settlement Hierarchy

### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	✓	No		Unsure	
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If not, please provide details of what changes you think should be made.

Although the settlement hierarchy should be retained within the Local Plan, the proportion of development allocated to each tier of the hierarchy should be reconsidered following full assessment of potential sites. Our clients own land at Ancaster which can come forward for development during the Plan period. One of these sites is an existing allocation (LV-H2, south of Wilsford Lane) and the other is an unallocated parcel of land in the centre of the village, on the eastern side of Ermine Street. A submission has been made in relation to the latter through the Council's Call for Sites process. The Council will need to amend the proportion of development that falls within each tier to reflect the sites that it proposes for allocation and sites such as this one may result in a greater proportion of development taking place in the larger villages.

### Q5b – Settlement Hierarchy Methodology

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	✓	No		Unsure	
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**If not, please provide details of what changes you think should be made.**

Our clients own land suitable for development adjoining Ancaster, which is identified as a larger village. Given the sustainable nature of Ancaster, benefiting from a range of local services and facilities with good public transport accessibility, we support the inclusion of Ancaster within the 'larger villages' category. We support the Council's recognition that the larger villages can accommodate additional development and we propose that the land east of Ermine Street, Ancaster should be included within the Local Plan as a new allocation.

When the Council reviews the larger villages in terms of their facilities and services, it is important to note that Ancaster benefits from not only a train station, but also regular bus services to nearby centres. This accessibility by bus appears to have been somewhat overlooked in the Council's previous assessment.

### Q5c – New Settlement

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

Yes		No	✓	Unsure	
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**If so, please outline any suitable and deliverable proposals.**

No new site or proposals have been identified for a new settlement and such developments typically have long lead in times and therefore, even if a site was identified, it would be unlikely to make a significant contribution towards housing requirements of the District within the Plan period.

The current approach to development, which seeks to accommodate additional housing requirements within or adjoining existing settlements, with scale of development dependent on their position within the settlement hierarchy, is a sustainable approach to development, which will support existing services and facilities.

## 10. Proposal 6 – Housing Need and Requirement

### Q6 – Housing Need and Requirement

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?**

Yes	✓	No		Unsure	
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**If not, what evidence do you have to justify an alternative need and requirement?**

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

<b>Yes</b>	✓	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

Whilst this is supported, opportunities within larger villages should be fully explored (see response to Q7c below).

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>	✓	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

Whilst this is supported, opportunities within larger villages should be fully explored (see response to Q7c below).

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

<b>Yes</b>	✓	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

The larger villages within the District generally have a good range of services and facilities and development within/adjoining those villages can help to support the existing services and facilities. The village of Ancaster benefits from two allocations at the southern end of the village but has the potential for a further small-scale development within the centre of the village on land owned by our clients. Land to the east of Ermine Street, as detailed on the attached brochure and within our Call for Sites submission, represents a sustainable location for a new development of around 25 to 30 dwellings within a larger village.

A detailed assessment of sites undertaken as part of the Local Plan review process, should enable appropriate sites, such as our client’s land at Ermine Street in Ancaster, to come forward for development. This may increase the proportion of new housing within larger villages, helping to

sustain their existing services and facilities, without fundamentally changing the general distribution of growth.

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**If not, please provide details and any alternative proposals.**

These smaller settlements have a limited level of facilities and services and development within them would result in a reliance on high levels of trips by motorised vehicles. It is agreed that development at the higher tiers, which have better access to services and facilities, represent a more sustainable approach to development than development within smaller settlements.

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Please provide details**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**If yes, please provide details.**

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details.**

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details.**

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details.**

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**Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

**Please give details**

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**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

**Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details**

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details**

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**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Please refer to our submissions to the Call for Sites consultation when considering future sites to be allocated to meet the housing needs of the District to 2041. Our client’s land within the centre of Ancaster, on the eastern side of Ermine Street, can provide a modest development of around 25 to 30 dwellings on 0.9ha of land, with open space to the south. This development is well located in relation to existing services and facilities and provides an opportunity for enhancement in this part of the village. Our clients would welcome the opportunity to discuss these proposals with officers, as appropriate.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

It is important to recognise that the Sustainability Appraisal considers broader concepts, such as growth at larger villages, rather than individual assessment of sites. The next stage of the Sustainability Appraisal process will need to consider individual sites, which in the case of our client’s land to the east of Ermine Street, Ancaster can be summarised as follows:

Biodiversity and Geodiversity	Site located away from the three SSSIs in the vicinity of Ancaster. Biodiversity/geodiversity not considered to constrain development.
Landscape	Landscape sensitivity of the site has been assessed by consultants (report attached) and it has been concluded that the site is well contained, nestled into the landscape at the bottom of a valley, with limited long range public views. The site has the potential to provide a more appropriate design than the development immediately to the north of the site, providing a development that is set back from Ermine Street, behind a line of trees. The development can also provide landscape enhancements on land proposed for open space to the south.
Historic Environment	This site is located away from the historic core of Ancaster, which towards the southern end of the village and therefore proposals would not harm the historic environment.
Air, land, water and soil resources	The small-scale nature of the proposal will not have a negative impact on resources.
Climate change	The site is sustainably located in relation to services and facilities within the village and is also in walking distance of the railway station and bus stops, providing access by public transport to retail/employment centres in the vicinity.
Population and community	Ancaster has a range of social and community services and facilities and new residential development will help to

Health and wellbeing	support existing facilities. As identified within the SA, limiting growth in larger villages would have the potential to undermine their viability and vitality.
Transport	Additional dwellings on this site in Ancaster would have the potential to support local leisure, recreational and health services in Ancaster.
Economic vitality	The site benefits from a being within walking distance from both a railway station and also bus stops, providing good accessibility to key destinations by non-car modes.
	Residential development in this location can help support community services and employment opportunities.
<b>Thank you for responding to this consultation.</b>	

## SKETCH PROPOSALS



## THE ILLUSTRATIVE SITE PROPOSALS

An indicative sketch scheme for this site has been prepared, showing how a residential scheme could be configured. It is envisaged that a modest development of around 25 to 30 dwellings on this 0.9ha site would be appropriate in the context of the surrounding area. It is envisaged that development would provide an active frontage of residential development along Ermine Street, respecting the existing building line. The land to the south and the east of the site also falls within our clients' land ownership. This land has potential for flooding and therefore would not

be suitable for residential development. It would however, provide an opportunity for public open space, which will be available for both the new and existing residents.

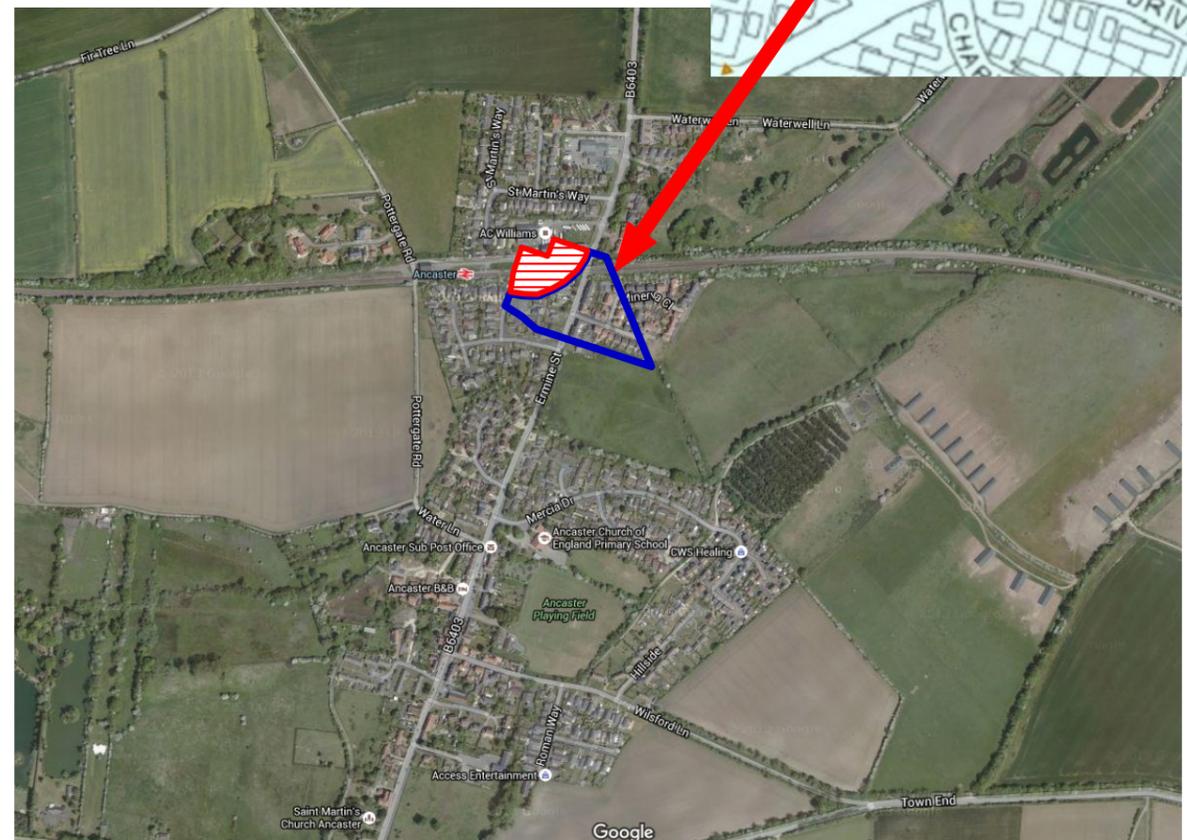
Development of this site can make a positive contribution towards the Council's housing supply. It will also have a positive impact locally, helping to sustain local facilities and services and contribute to the acknowledged shortfall of affordable housing within the village.

## LAND EAST OF ERMINE STREET, ANCASTER

### INTRODUCTION

This brochure provides supplementary information to support the submission of this site to the Council's Call for Sites (2020)

This land is promoted for residential development by Phase 2 Planning and Development Ltd on behalf of the landowners.



### POLICY BACKGROUND: ANCASTER AS A 'LARGE VILLAGE'

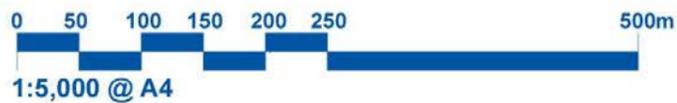
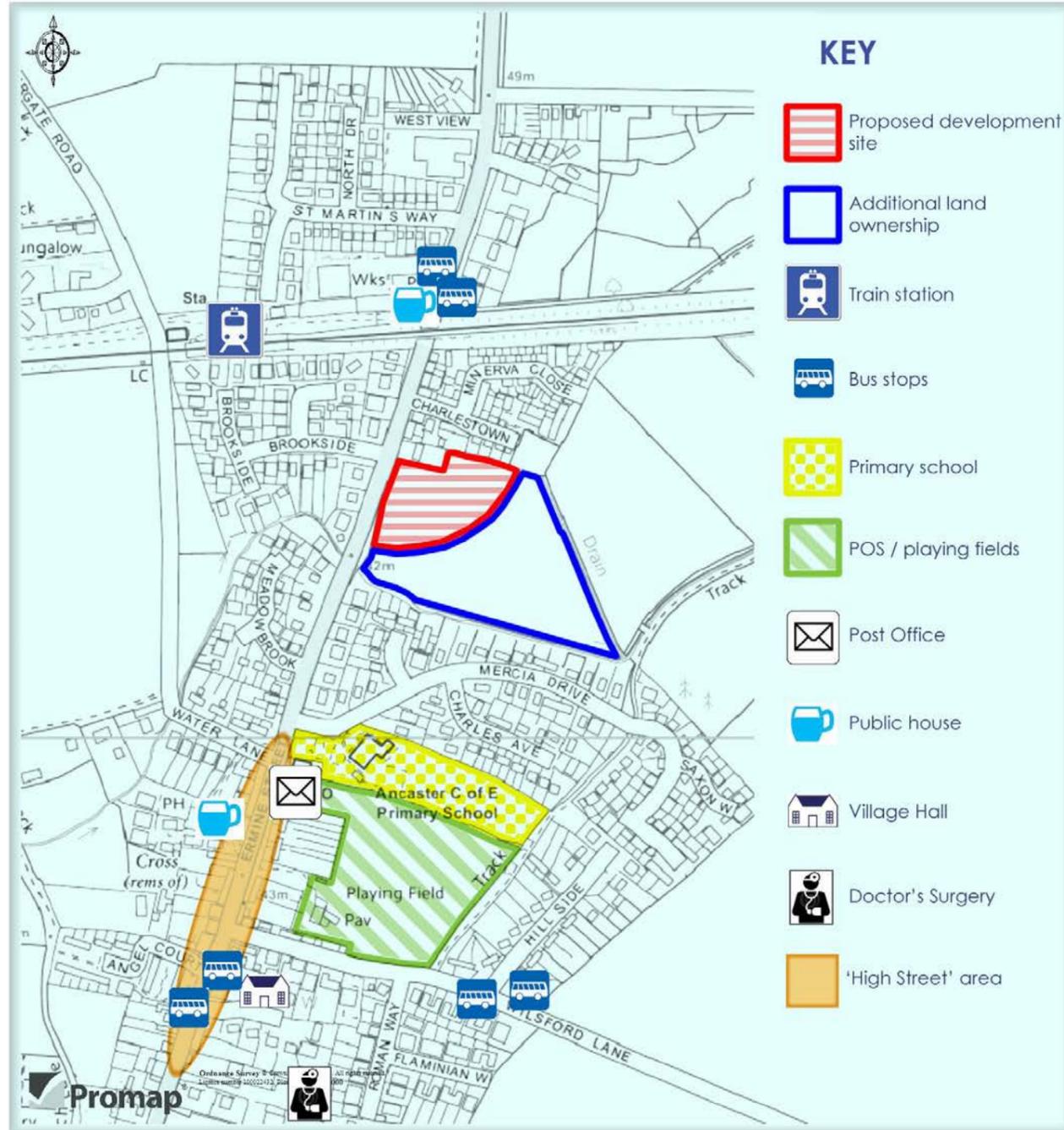
The Local Plan identifies Ancaster as a 'Large Village' and recognises that these settlements offer a "good level of services and facilities" and which act as a focal point for the rural communities and their surrounding hinterland.

The Local Plan recognises that beyond the four main towns the larger villages are considered to be the next most sustainable locations for growth within the District and therefore should positively contribute towards meeting the District's overall growth needs.

## SITE CONTEXT PLAN



### Land at Ermine Street, Ancaster: SITE CONTEXT



## SITE LOCATION

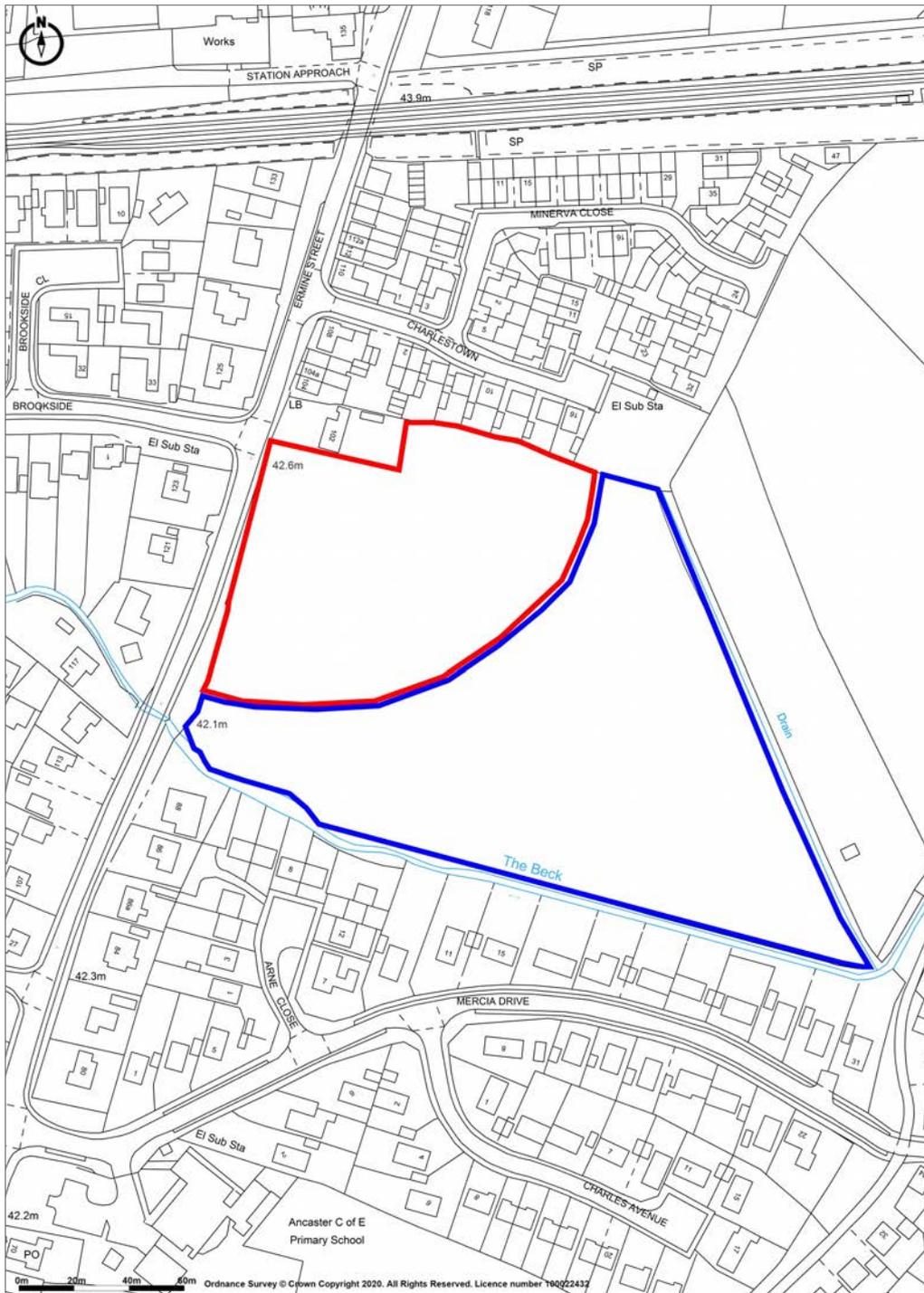
The site is extremely well located within the village of Ancaster, close to the train station and a range of facilities and is enclosed by development to the north, west and south. The village benefits from a primary school, a GP surgery, two public houses, a social club and sports ground, a village hall, a convenience store, a post office, a butcher's shop, a church and a petrol filling station. A pre-school and a number of other clubs and groups run from the village hall. The village also has some local employment.

The number 27 bus service runs through the

village, between Grantham and Sleaford providing links to local towns and villages. Ancaster also benefits from a train station, which is only 350m from the site and provides direct services to Skegness and Nottingham and also the nearby market towns of Grantham and Sleaford.

Grantham is approximately 14km (9 miles) from Ancaster and has a wider range of services and facilities including a range of high street shops, supermarkets and larger retail units, restaurants, a leisure centre, a number of schools and Grantham Hospital.





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 Plotted Scale - 1:2500. Paper Size – A4

LANDSCAPE RESOURCE:		EFFECT:	PROPORTION CHANGED:	IMPACT DURING CONSTRUCTION:	YR 5	YR 15	YR 25
EXTERNAL RESOURCES	Existing residential development adjacent to north, south and west of site.	Potential works on/ adjacent to site and surrounding areas.	Low	A.	M.	NC.	NC.
	Existing carriageway and footpaths to west of site (Ermine Road)	Potential works on/ adjacent to Ermine Road.	Low	A.	M.	NC.	NC.
	Railway embankment to north of site.	None	None	NC.	NC.	NC.	NC.
	Historic village core of Ancaster.	None	None	NC.	NC.	NC.	NC.
	Adjacent river valley floor and associated vegetation.	Potential works on/ adjacent to water courses.	Low	MA	NC.	NC.	NC.
	Existing properties, roads, footpaths and farms on raised ground to north, east, south and west of site	None	None	NC.	NC.	NC.	NC.
	Land form.	None	None	NC.	NC.	NC.	NC.
INTERNAL RESOURCES	Existing field	General removal of low/medium grade grassland. Replacement with residential development and biodiversity rich landscape	High	A.	M.	MB.	B.
	Ermine Street frontage	Infill of gap with built form set within soft landscape structure against boundary.	High	A.	M.	MB.	B.
	Existing water course	General management and improvement to water course including new habitats and biodiversity rich landscape	High	A.	MB.	B.	B.
	Existing vegetation to site boundaries	Reinforcement of existing landscape structure and boundaries	High	M.	MB.	B.	B.
	Hard enclosure to site boundaries	Replacement of low grade enclosure with better quality materials and soft landscape structure	High	M.	B.	B.	B.
	Land form.	Foundations required for new structures. Some minor below ground works required for service provision etc.	Low	MA.	NC.	NC.	NC.

## KEY TO ABBREVIATIONS:

TO DESCRIBE IMPACT OF THE EFFECTS:

A.	ADVERSE.	MB.	MINOR BENEFIT.
MA.	MINOR ADVERSE.	B.	BENEFIT.
M.	MODERATE IMPACT.	NC.	NO CHANGE.



REF POINT:	CHANGE IN VIEW	RECEPTORS:	IMPACT DURING CONSTRUCTION	YR 5	YR 15	YR 25
1	Poor: site area is well screened by existing vegetation and topography.	Pedestrians Motorists.	NC.	NC.	NC.	NC.
2	Poor: site area is well screened by existing vegetation and topography.	Pedestrians Motorists.	NC.	NC.	NC.	NC.
3	Poor: site area is well screened by existing vegetation and topography. Also distance ensures edge of village settlement is indistinguishable.	Pedestrians Motorists.	NC.	NC.	NC.	NC.
4	Poor: site area is well screened by existing vegetation and topography. Also distance ensures edge of village settlement is indistinguishable.	Pedestrians Motorists.	NC.	NC.	NC.	NC.
5	Poor: Site area is obscured by existing vegetation and land form.	Pedestrians Motorists.	NC.	NC.	NC.	NC.
6	Poor: Site area is hidden within valley floor and further obscured by vegetation and village settlement.	Pedestrians	NC.	NC.	NC.	NC.
7	Poor: Site area is hidden within valley floor and further obscured by vegetation and village settlement.	Pedestrians Property owners/ occupiers.	NC.	NC.	NC.	NC.
8	Poor: viewpoint is flat in relation to site and also well screened by village settlement and existing landscape structure.	Pedestrians	NC.	NC.	NC.	NC.
9	Poor: viewpoint is well screened by village settlement and existing landscape structure.	Pedestrians	NC.	NC.	NC.	NC.
10	Significant: Site is seen in full or part from street and adjacent properties.	Pedestrians Motorists. Property owners/ occupiers.	A	M	MB	B
11	Significant: Site is seen in full or part from street and adjacent properties.	Pedestrians Motorists. Property owners/ occupiers.	A	M	MB	B
12	Significant - limited: Site is seen in part and full from footpath and adjacent properties.	Pedestrians Property owners/ occupiers.	A	M	MB	B
13	Significant - limited: Site is seen in part and full from footpath.	Pedestrians	A	M	MB	B
14	Poor - very limited: Site is predominantly hidden within valley floor and further screened by existing vegetation. Potentially some rooflines may be visible but only within existing settlement.	Pedestrians Motorists.	M	M	NC.	NC.
15	Poor: site area is well screened by existing vegetation and topography. Distance from site reduces significance of view.	Pedestrians	NC.	NC.	NC.	NC.
16	Poor: site area is well screened by existing vegetation and topography. Distance from site reduces significance of view.	Pedestrians Motorists.	NC.	NC.	NC.	NC.

## KEY TO ABBREVIATIONS:

TO DESCRIBE IMPACT OF THE EFFECTS:

A.	ADVERSE.
MA.	MINOR ADVERSE.
M.	MODERATE IMPACT.
MB.	MINOR BENEFIT.
B.	BENEFIT.
NC.	NO CHANGE.



## 5.0 Mitigation

- 5.1 The purpose of mitigation is to avoid, reduce or where possible remedy or offset any adverse effects on the environment arising from the development. It is not damage limitation. Mitigation is phased in 2 parts: Primary and Secondary Mitigation.
- 5.2 Primary Mitigation is that which is intrinsically part of the development design process. Primary Mitigation drives the project design: dictates the siting, access, layout, building structures and ground modelling in so far as they affect landscape and visual resources.
- 5.3 Secondary Mitigation is designed specifically to address the residual adverse effects. Secondary Mitigation is specifically for addressing any negative effects of the final development and is considered in the assessment of landscape and visual effects. They also meet the formal requirements to identify measures for the avoidance or reduction of negative effects.
- 5.4 Long term success of the landscape proposals are those which meet the environmental, technical and locational development constraints. It is important to demonstrate that the long term control and management of the site is secure.
- 5.5 The ideal strategy is one of avoidance. Avoidance of negative landscape and visual impacts can be achieved through careful siting, planning and design. Where negative effects cannot be avoided, the reduction of any remaining conflict requires detailed consideration of the site characteristics.
- 5.6 Add on or cosmetic landscape measures such as uncharacteristic screen planting are likely to be least successful. Sympathetic treatment of external areas should augment the integration of a new development into the landscape. Remediation is part of the overall process of avoiding and reducing adverse impacts.

### Guidelines for Mitigation

- 5.7 All negative landscape and visual impacts that are likely to occur through the projects life cycle should be considered. Landscape mitigation measures should suit the existing landscape character and its needs of the locality, respecting and building on local landscape distinctiveness and assisting in addressing any relevant existing issues in the landscape.
- Many mitigation measures such as planting are not immediately effective. Residual effects may be assessed in Y5, Y15 and Y25.

The Appraisal may identify measures to manage necessary change while maintaining and enhancing the quality of the environment. These measures could include:

- Restoring or reconstructing local landscape character and distinctiveness.
- Identifying building forms that are sensitive to local use, scale and form.
- Meeting, planning policy design and landscape management objectives
- Solving specific technical issues.

- 5.8 The mitigation strategy should also address and satisfy the requirements of all planning legislation pertinent to the site. These aspects are identified and set out within section 5.18 below.

### Key Considerations

- 5.9 The key considerations to be fed into the development process should address the common mitigation measures identified in the following sections.
- Those addressed within the primary mitigation strategy will ensure that the development sits comfortably within the existing settlement edge and landscape structure. The secondary mitigation should focus on the long term management and sustainability of landscape features associated with the site and by conserving and enhancing any existing habitats and increasing opportunities for new ones where appropriate.

### Primary Mitigation

- 5.10 A landscape survey was conducted on and adjacent to the site as part of the landscape appraisal discussed in detail in chapters 2-4. It subsequently confirmed sensitive off site viewpoints and areas of visual intrusion within the site, the results of which are clearly identified on figs 4-6. These form the basis of the requirements for mitigation identified within this chapter.
- 5.11 Mitigation should initially aim to address any adverse influence or visual resources caused by the inherent nature of the new development within the existing setting.

### 5.12

On assessment it can be seen that the individual qualities and characteristics associated with the site in terms of adjacent built form, topography and vegetation belts already acts to comfortably absorb development on this site. This is particularly apparent from the west. The development site is located to the eastern edge of the Ancaster village settlement. The existing form of the village acts to physically and visually screen the site from viewpoints beyond the village to the west. This effectively, forms an “end stop” to any influence in this direction. Topography is also an important factor. The village and consequently, the site location is positioned on The Beck river valley floor. This coupled with rising ground to the valley sides to the north, south and east ensures that medium/long range view points to the north, east and the south are “screened out” entirely or significantly reduced in impact and importance.

- 5.13 The overall height of the development is yet to be fully agreed. However, it is envisaged that this would be limited to a range of one, two and two and a half storey dwellings. Generally proposed built form will sit between, within and often beneath the canopy height of the strong adjacent landscape structure. Furthermore, significant quantities of vegetation on the valley sides and floor to the east, north and south will limit medium range views from these directions. Receptors located further away will obtain some minor views of very limited extent and quality. While they pick out the

general area of the village and in some instances roof scape of proposed built form, due to the greater distances this forms only a very small portion of the view. Also proposed ridge lines easily blend with the existing settlement edge of Ancaster which is only partially visible in these instances.

- 5.14 In respect of points 5.12 and 5.13 it can be concluded that the proposed development requires only limited mitigation due to the unique qualities associated with its current physical location.
- 5.15 Short range views of the site are obtained from adjacent points on Ermine Street and existing properties adjacent to the north, west and southern site boundaries. Views from areas of public access are also obtained from a footpath beyond the eastern boundary and are also afforded from the railway line that runs on a raised embankment to the north. The views from the railway line are considered of limited value. It must be understood that as previously stated in earlier chapters, these are gained from a moving train and over a very short timescale. Furthermore, it is envisaged that the mitigation strategy advocated in these sections will act to ensure the views are significantly reduced still further.
- 5.16 On more detailed assessment it is apparent that the location of the site and its relationship to the Ancaster village settlement also significantly influences physical and visual impact. Proposed built form of suitable scale and height along with sensible positioning in respect of the existing building line can be seen to sit comfortably and logically within this gap in the village street scape. Short range views from the south and east are already of buildings, ridge and roof lines sitting within the existing landscape structure. The existing landscape framework must be extended to the boundary and interior areas in both extent and significance in order to ensure that any new development fits this existing character.

When considering viewpoints within the landscape to the east it is also important to note that mitigation along the site boundary to east and south has wider reaching importance. Incorporation of open space coupled with a strong framework of indigenous vegetation will both visually and physically anchor the site within the existing landscape framework and absorb new development within the settlement edge. From a number of viewpoints to the east it will also act to soften the edge of the adjacent residential development to the north of the site as well.

- 5.17 To the north and western site boundaries the site is more exposed to influence. To the north the site sits immediately against existing residential development which dominates the landscape setting. While extending built form into the site on this boundary would logically fit with the existing form and character of the village it is recognised that a landscape zone comprising gardens, boundary landscape vegetation and tree planting would provide a suitable semi permeable screen and buffer zone between housing areas.

To the west the Ermine Street boundary needs careful consideration to ensure suitable mitigation. This is required not only to allow satisfactory absorption of proposed built form within the settlement edge but also to aid in improving the existing street scene. At present Ermine Street follows a logical sequence. The traditional form and materials associated with the village core and conserva-

tion area spreads northwards into an eclectic mix of building styles set back behind a strong landscape structure. This is punctuated by the existing water course that crosses the road and is framed by associated indigenous vegetation. As the road moves north beyond the water course the character of built form set back within a strong landscape structure continues. However, at the development site there is noticeable fragmentation of landscape elements and illogical gap in both built form and soft landscape structure. Beyond this the modern estate development adjoining the northern boundary of the site is clearly visible. Its position in close association with the road, its density and lack of structural landscape ensures this dominates the street scene and is in contrast to the existing character of Ermine Street.

It will be necessary to extend the existing tree belt and extend/reinforce the fragmented hedgerow understorey that exists adjacent to the water course. This will ensure that the current landscape features and character runs logically along the western site boundary. This will then act to screen, soften and buffer new development within the settlement edge and mitigate views from properties and viewpoints to the immediate west of the site. It will also act to create a more consistent approach to Ermine Street by extending the existing character of the street scene (built form set back behind strong landscape structure). It will also aid in softening the impact of the existing residential development adjacent to the northern site boundary and general improve the visual and physical appearance of both Ermine Street its self and the village settlement edge.

5.18 The mitigation strategy should ensure the development proposals, when complete and effective address the requirements and aspirations of all applicable planning policy and guidance. The pertinent policies are as follows:

Policy SP2: Local Development Framework (July 2010)

- Support will be given to proposals and activities that protect, retain or enhance existing community assets or lead to the provision of additional assets that improve community well being. Proposals involving the loss of community facilities including land in community use will not be supported.

Appendix 3 shows that any potential development layout for the site will provide a significant area of publically accessible and usable open space. It is envisaged the open space will support passive recreational pursuits generated by both the existing Ancaster village settlement and any proposed residential development.

Furthermore, a footpath link will be created to join Ermine Street with the path that runs to the east of the site location. This will act to increase connectivity but specifically enhance provision for public access from the village settlement to the wider landscape.

In this way it can be seen that the addition of significant areas of usable open space and improvements to the existing landscape framework and footpath network along with resultant habitat improvement will significantly increase community assets.

Policy EN1: Design: Local Development Framework South Kesteven (July 2010)

- Development must be appropriate to the character and significant natural, historic and cultural attributes and features of the landscape within which it is situated and contribute to its conservation, enhancement and restoration.

Chapter 4 and sections 5.12 to 5.17 clearly shows that the site sits in an appropriate gap in the existing street scape of the Ancaster village settlement edge.

Furthermore, the juxtaposition of surrounding topography and vegetation coupled with its position between areas of existing built form ensures that sensitive development of the site would be appropriate. Residential land use in association with significant areas of open space and structural landscape elements would work within and in many cases, reinforce the character of the village edge and landscape setting.

It should also be noted that potential additions and improvements to the site boundary and interior zones would certainly act to restore the fragmented landscape structure. It will also add additional landscape features, extend existing areas and provide an increase in habitats and biodiversity. In this way it can be seen that such appropriate treatment of the site would definitely contribute to conservation, enhancement and restoration of the existing landscape.

As previously stated the site is significantly and appropriately detached both physically and visually, from the central and historic core of the village, its conservation area and scheduled ancient monuments. (See Fig 3b).

Consequently, development of the site must be considered appropriate to the character of significant natural and historical attributes of the village.

## Secondary Mitigation

Policy EN1: Design: Local Development Framework South Kesteven (July 2010)

- Development must be appropriate to the character and significant natural, historic and cultural attributes and features of the landscape within which it is situated and contribute to its conservation, enhancement and restoration.

5.19 It is recommended that this develops along two fronts in order to address/meet the policy aims. Firstly, mitigation should seek to improve and strengthen the existing soft landscape boundaries to the West, south and east. In all instances there is an absence of complete understory layers beneath the existing tree cover. It has already been concluded that some continuous and glimpsed views are gained between, through and under the existing canopy. Provision of additional shrub and hedge layers would act to alleviate any residual visual impact in these locations.

Secondly, any existing habitats within the boundary zones are retained, protected and enhanced. In particular, Indigenous landscape structure along the water courses and site boundaries will be rejuvenated and extended. Furthermore, the opportunity to introduce areas of locally and nationally important grassland and wild flora within the proposed open spaces also exists. Finally, areas of additional habitat value such as woodland scrub or copse could also be considered.. This will be achieved by adhering to any recommendations and proposals identified within the ecological and arboricultural reports for this site (when produced) as well as the aims and aspirations of the Lincolnshire Biodiversity Action Plan and Lincolnshire Local Geodiversity Plan. Strengthening of the existing understory layers along with the provision of landscape elements described above will ensure a wide diversity of landscape types and heights and will potentially increase the range of habitats as well as improve connectivity between off site landscape elements.

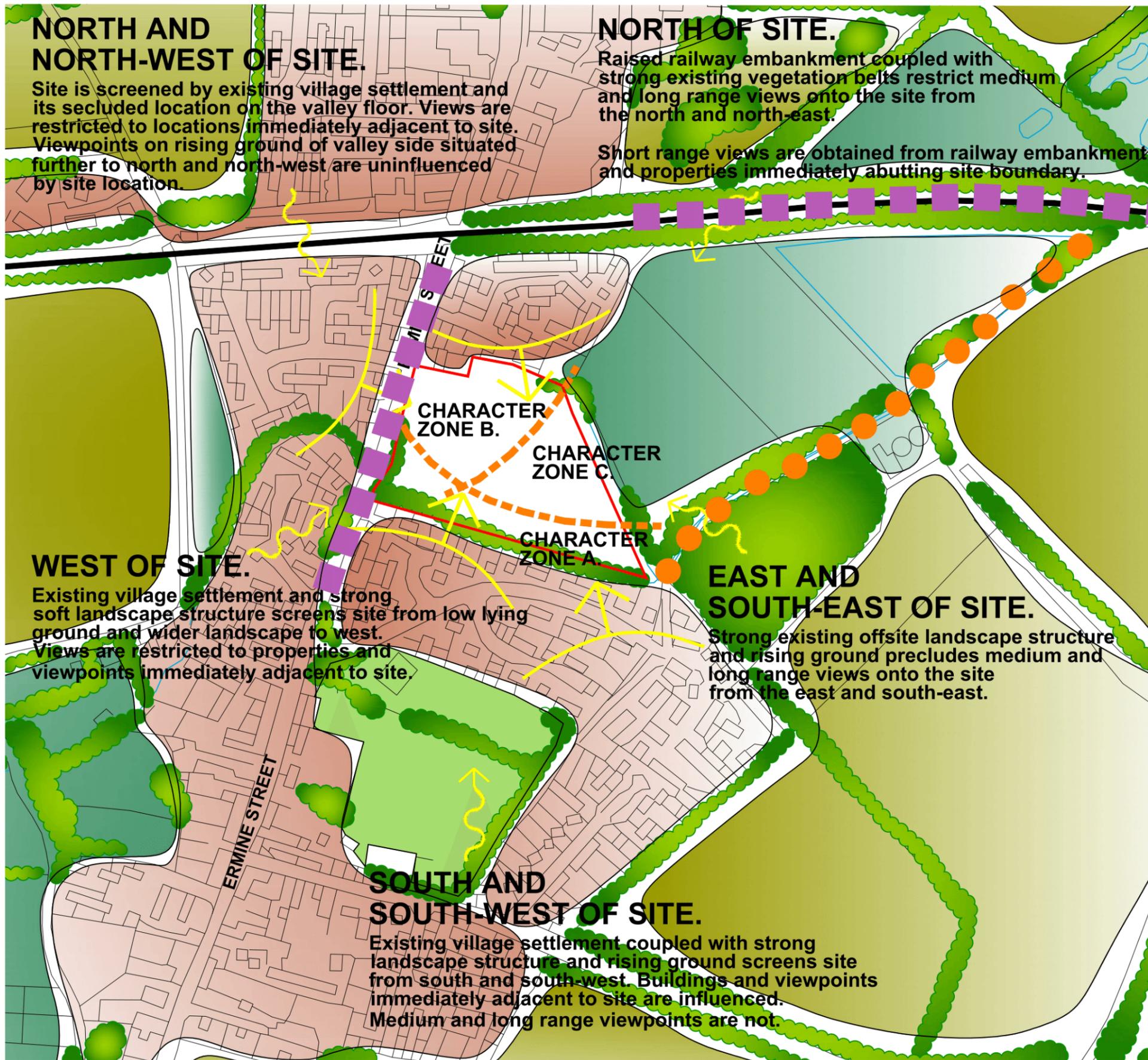
It is envisaged that Lighting will be retained at an absolute minimum with a design precedent to remove wherever possible. Where lighting is required this will be provided at minimum legal light standards and heights and will be downward and direction controlled.

5.20 The maintenance programme and management of the site will be central to ensuring that any residual minor adverse effects are controlled and that the site functions well and sits comfortably within the existing edge of settlement setting and landscape structure.

A detailed maintenance schedule and plan should be submitted alongside the detail landscape design proposals.

5.21 The mitigation proposals identified within figures 6 and 7 will inform the later stages of the development process. In particular, detail landscape design proposals. It is envisaged that all strategic and detail landscape design proposals, materials and elements utilised on the scheme will be in accordance with details agreed with the local planning authority at a later stage and shall comprise implementation, establishment and management proposals.





**LEGEND.**

-  SITE BOUNDARY.
-  EXISTING BELTS SIGNIFICANT VEGETATION
-  EXISTING OPEN SPACE
-  EXISTING DEVELOPMENT ADJACENT TO SITE.
-  EXTENT OF LANDSCAPE CHARACTER ZONES
-  MINOR AND POOR VIEWS FROM PROPERTIES AND OPEN COUNTRYSIDE.
-  VIEWS FROM PROPERTY
-  VIEWS FROM GROUPS OF PROPERTY
-  VIEWS FROM OPEN SPACE
-  PUBLIC FOOTPATHS AFFECTED.
-  HIGHWAYS AFFECTED.



**CHARACTER ZONE A:**

Existing water course with indigenous vegetation abutting it. Grassland adjoins line of water course on site side. Medium/high quality. High sensitivity to change on boundary. Existing boundary landscape structure requires strengthening. Water course and associated areas need enhancement. Link this character area to offsite landscape corridors of the wider landscape framework.

**CHARACTER ZONE B:**

Existing grassland field adjoining Ermine Street and set between Housing areas. Low/medium sensitivity to change. Low/medium quality. This area provides an illogical gap within the existing street scene which is characterised by built form set within a soft landscape framework. Character area needs to be developed to strengthen its position within Ermine Street.

**CHARACTER ZONE C:**

Existing grassland field set beyond the building line of the village edge in this location. Medium/high sensitivity to change. Low/medium quality. Character of this section relates more strongly to the open fields of the adjacent flood plain. This character area needs to be developed as a buffer/transition built form of the village edge and the wider landscape framework.





### WESTERN BOUNDARY.

Extend, enhance and strengthen existing tree belt to Ermine Street.  
Extend and enhance understorey hedge and shrub zone in order to reinforce existing landscape structure.

### NORTHERN BOUNDARY.

Provide housing cells to link edge of existing building line through to Ermine Street and fill gap within street scene.  
Provide buffer zone of gardens and soft landscape elements between proposed built form and existing development.

### CENTRE OF SITE.

Provide open space to link visually between southern water course boundary and open grassland beyond.  
Provide indigenous tree and shrub groups to create structure to open space and semi permeable screen between Ancaster village edge and wider landscape.  
Also create footpath link with open space to set up linkage between Ermine Street and paths within the wider landscape.

EXISTING RESIDENTIAL DEVELOPMENT

ERMINE STREET

OPEN GRASSLAND

### SOUTHERN BOUNDARY.

Retain, enhance and reinforce existing water course and increase habitat diversity and biodiversity. Add indigenous vegetation belts to link site to wider landscape corridors to east and west of site.

MERCIA DRIVE

EXISTING RESIDENTIAL DEVELOPMENT

### EASTERN BOUNDARY.

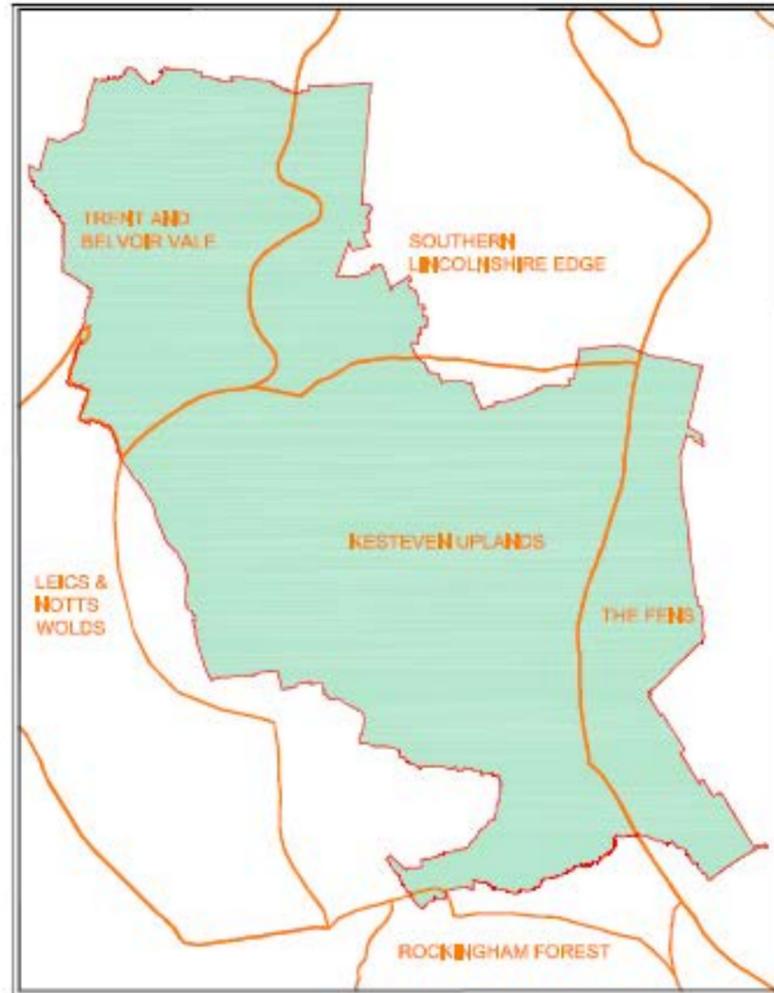
Strengthen existing hedgeline and boundary vegetation. This will screen out proposed and existing built form from the wider landscape. Also to enhance habitats and biodiversity opportunities by water course.



## 6.0 Conclusion

- 6.1 The 'Landscape Appraisal' establishes that there is a strong environmental fit between the landscape, the special arrangement of the site on the edge of the Ancaster village settlement and the surrounding landscape as defined within The South Kesteven and North Kesteven Landscape Character Assessments. Sections 3-5 of this document provide very strong evidence to show that appropriate and sensitive residential development proposals for this site would be appropriate and achieve the aims of the landscape assessment and the pertinent planning policies applicable to this development. Figures 6 and 7 illustrate how the proposals would sit comfortably within the existing landscape framework and in many cases improve the quality of the local environment.
- 6.2 The base line study showed that due to the position of the site and it possessing partial qualities of two adjoining landscape character areas with particular qualities of local land form and relationship of significant landscape elements and built form, there are a limited number of significant views into the site and as such these views exist within narrow zones of visual influence. Furthermore, where other views do exist, these are either through a strong existing landscape screen or obtained from much greater distances. In these cases they are limited to glimpses of the settlement edge, picking out elements of built form, roof lines and vegetation rather than being site specific. These view types reflect the existing character of view experienced from the surrounding landscape. As a consequence of this they are insignificant in terms of visual impact when considering development of the site in isolation.
- 6.3 The core element of the proposals, built form, can be seen to retain and in many cases improve local village character. Sensitive choice of materials and colours coupled with careful control of arrangement of built form and density would ensure that the proposals sit comfortably on the edge of both the existing landscape framework and structure of built form.
- 6.4 The impact assessment demonstrated that during construction the development might have minor adverse effects. However, the nature of the site, the position of proposed development along with arrangement of surrounding built form, landscape elements and topography will ensure that the proposals are successfully absorbed and hidden within the existing settlement edge and landscape structure. For the majority of receptors this will be the case from year 1. Areas abutting the site boundary to the west and north are likely to be influenced for a longer time period until potential improvements to the structural landscape elements improve the effect on the site and surrounding landscape over time.
- 6.5 The Assessment of impacts and effects coupled with mitigation proposals indicates that the development will be able to potentially improve the ecological value of the site. There will be increases in important soft landscape elements and habitats. This will aid in improving green links and connectivity between the site and the existing surrounding landscape structure.
- 6.6 As such, these proposals will achieve an appropriate environmental fit with sensitively designed development proposals that dove tails new structures within an existing landscape, by which it is meant a development design that is appropriate in style, scale, form and function. This is supported by the 'South Kesteven landscape character assessment' and 'baseline study'. Furthermore, the assessment and design process set out in Chapter 5 shows how the improvement of both internal and boundary landscape elements, while not specifically required to mitigate the short term disturbance created by the development on medium, long, many short range viewpoints and zones of influence will in the mid to long term enhance the landscape character of all locations. In this way appropriate development will benefit the landscape and visual resources of the site. It will also contribute to reinforcing and improving the appearance of the site location within its local context.



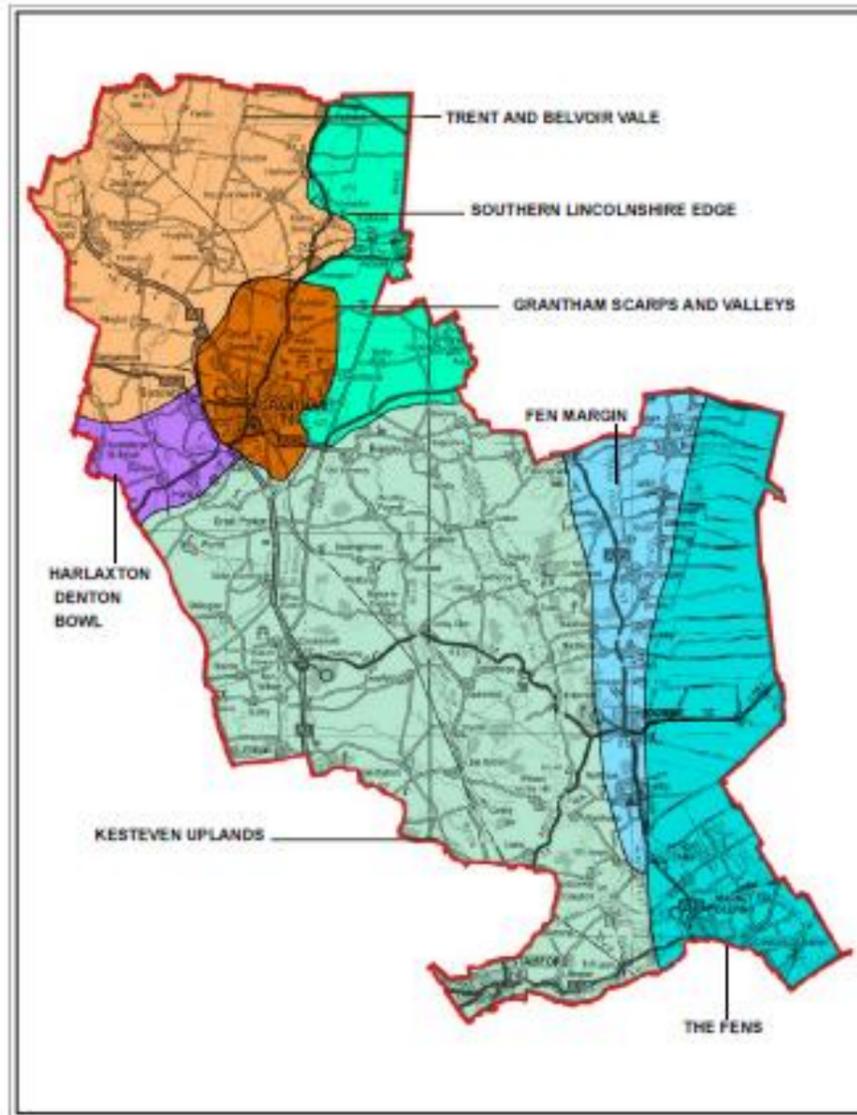


Key  
Red line District Boundary  
Orange line Character Area Boundary

South Kesteven Landscape Character Assessment  
COUNTRYSIDE AGENCY CHARACTER AREAS

Figure 2  
July 2008

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This information has been gathered from the Countryside Agency of Information cannot be guaranteed.  
South Kesteven District



KEY  
 District Boundary  
 Character Area Boundary

South Kesteven Landscape Character Assessment  
**CHARACTER AREAS**  
 Figure 13  
 July 2006

# SKETCH PROPOSALS





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**Landscape  
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Registered practice



■ **ERMINE STREET,  
ANCASTER.**

**LANDSCAPE APPRAISAL.**

## CONTENTS:

1.0 INTRODUCTION	Page 2
2.0 LANDSCAPE CHARACTER ASSESSMENT	Page 4
3.0 BASELINE STUDY	Page 9
4.0 ASSESSMENT OF IMPACTS AND EFFECTS	Page 21
5.0 MITIGATION	Page 26
6.0 CONCLUSIONS	Page 32

## APPENDICES:

- 1: National Character Areas- (Countryside Agency/Natural England)
- 2: South Kesteven Landscape Character Areas (South Kesteven District Council)
- 3: Concept sketch layout proposals (Phase 2 Planning and Development Ltd)

## BIBLIOGRAPHY:

- GUIDE TO LANDSCAPE AND VISUAL IMPACT ASSESSMENT (3<sup>rd</sup> EDITION 2013)
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- SOUTH KESTEVEN LANDSCAPE CHARACTER ASSESSMENT ( JANUARY 2007) (SOUTH KESTEVEN DISTRICT COUNCIL)
- NORTH KESTEVEN LANDSCAPE CHARACTER ASSESSMENT (SEPTEMBER 2007) (NORTH KESTEVEN DISTRICT COUNCIL)
- LOCAL DEVELOPMENT FRAMEWORK (JULY 2010) (SOUTH KESTEVEN )
- ANCASTER VILLAGE CONSERVATION AREA (JULY 1982/JUNE 2010) (SOUTH KESTEVEN DISTRICT COUNCIL)



## 1.0 Introduction

- *This appraisal should be seen as a fluid document that can be updated as the design of the development proposals evolve over time. This being in line with the Landscape Institutes Guidelines for Landscape and Visual Impact Assessment third edition.(GLVIA3)*

1.1 Andrew Hastings Landscape Consultants have been appointed by Phase 2 Planning and Development Ltd to assess the landscape and visual impact of potential development at Ermine Street, Ancaster, Lincolnshire on the surrounding Landscape.

The assessment has been carried out by a Chartered Member of the Landscape Institute (C.M.L.I)

1.2 The report has been carried out to assess the capacity for landscape change and whether potential development proposals can be integrated into the existing landscape. The assessment refers throughout to the National Character Area Profiles –January 2014(NCA), the South Kesteven Landscape Character Assessment – January 2007 and the North Kesteven Landscape Character Assessment – September 2007. There has also been an opportunity to identify areas where the key characteristics of the landscape character can be enhanced. These are detailed in chapter 5.

1.3 The assessment has been carried out using a methodology that reflects the scale and aims of the development in line with the ‘Guide to Landscape and Visual Impact Assessment’ GLVIA. (3<sup>rd</sup> Edition).

1.4 The report methodology seeks to establish first the existing landscape character using the South Kesteven Landscape Character Assessment areas that apply to the site, before carrying out a baseline study of the existing landscape and visual resources of the site. The study seeks to measure the landscape condition and the environmental fit of the resources which enabled an assessment of the sensitivity of the landscape to change.

1.5 In chapter 4, the projected impact of the development is measured in the immediate, short and long term. For the purposes of this study, the impact was measured during construction, at 1 year after construction and then at 5, 15 and 25 years after construction. This allowed for an assessment that measures the long term impact of the development and as such, guides the mitigation strategy set out in Chapter 5.

1.6 The report concludes with Chapter 6 and the appendices include detailed information in support of the assessment.

1.7 The site is approximately 0.9Ha in size. The site comprises a roughly pentagonal shaped field .This consists primarily of grassland. There is an absence of existing built form, permanent structures and existing vegetation on the site. A water course runs within both the eastern and southern boundary zones. There are trees and vegetation along the site boundaries, particularly to the south, east and west. These are in the form of hedgerows, hedgerow trees blocks of scrub and tree lines. The vegetation is noted as being in varying degrees of both coverage and condition. At this stage there is no arboricultural or ecological report covering the site. Consequently, vegetation has not been subject to specialist assessment. At this stage no trees are confirmed as being subject to any Tree Preservation Order.

The site is perceived as being level. However, initial site appraisal confirms that the ground falls across the site from west to east.

1.8 The site occupies a gap within the eastern edge of the Ancaster village settlement. Fig 1 shows the relationship of the site to the settlements of Ancaster, Grantham and Sleaford. it also shows its context within the surrounding landscape framework created by The Beck flood plain and farmland to the valley sides. It also shows its position relative to the primary communication routes of the A153 road and the railway line connecting Grantham, Ancaster and Sleaford. The site is bordered on its western boundary by Ermine Street. Existing residential development abuts the site on its southern and northern boundaries as well as to the western side of Ermine Street its self. To the east the site sits against grassland and open countryside that forms the valley floor.

1.9 The potential proposal is to provide around 25 to 30 dwellings with associated access, access road/driveways, car parking, gardens, curtilage landscape and public open space. An image showing the concept proposals for the site is set out within appendix 3.





LEGEND.



SITE BOUNDARY.



NORTH

**Fig. 1 : Showing the location of the site and its relationship to the Ancaster village settlement, The Beck river valley Also its position in relation to the settlements of Sleaford and Grantham.**



## 2.0 Landscape Character Assessment

2.1 One of the key roles of this assessment is to ascertain how the proposed development can be integrated into the landscape in accordance with the landscape character and if possible, identify ways in which it may be enhanced.

A survey was carried out in August 2016 and was compared to both the National Character Area profiles (Natural England) and the South Kesteven Landscape character assessment (South Kesteven District Council) in order to assess the level of fit between the site and its landscape context. Appendix 1-2 includes plans identifying the relevant landscape character areas applicable to the site.

At a national level it can be seen that the site sits within NCA 47: South Lincolnshire Edge Landscape Character Area.

### 2.2 National Character Area: 47 – Southern Lincolnshire Edge.

The National Landscape Character Area profile sets out the following key characteristics of the landscape character area.

- Large scale upland arable escarpment.
- Open landscape with rectilinear fields and few boundaries.
- Where enclosure is still present there is a mixture of limestone walls, discontinuous hedges and shelter belts.
- Sparse settlement on top of the escarpment.

With regard to accommodating new development NCA profile 47 sets out the following landscape opportunities.

- Ensure new development is planned and executed to preserve a sense of place, sense of history, tranquillity and biodiversity while minimising water use and avoiding exacerbation of flooding and habitat fragmentation.
- Enhance provision for access and recreation.
- Enhance agricultural landscape connecting fragmented patches of limestone grassland, woodland and maintain the traditional fabric of the rural landscape.
- Protect and sympathetically manage geological features and historic features such as Ermine Street Roman Road, medieval earthworks, industrial buildings, historic dry stone wall networks and traditional villages.

The South Kesteven Landscape Character Assessment, the document that this report draws upon at the Local level, shows that the site sits within the landscape character area 3 “Southern Lincolnshire Edge”. However, it is also noted that the Ancaster village settlement and as a consequence of this, the site itself, is located within a valley at the top of the River Slea (The Beck) that cuts through the adjacent high ground of the Limestone scarp and dip slopes. As a result of this the characteristics and development opportunities pertaining to the village and its adjacent areas will also be influenced by this adjacent landscape character area which fits more appropriately to these specific natural site conditions. Therefore it is also necessary to assess the site against the Landscape character sub area 8.4 “Slea Valley” (North Kesteven Landscape Character Assessment).

### 2.3 Landscape Character Area: 3 – Southern Lincolnshire Edge.

The South Kesteven Landscape Character Assessment sets out the following key characteristics of the landscape character area.

- Large scale open arable landscape.
- Dominant western scarp known as “The Cliff”.
- Large rectilinear fields with some fragmented hedgerows and shelter belts.
- Sparse settlement pattern on top of the escarpment.
- Active and redundant airfields.

The key visual characteristic of the character area are:

- A remote and relatively simple agricultural landscape. The large rectilinear arable fields allow extensive views limited by distant woodland or the overlapping of hedgerows. The airfields provide activity in an otherwise relatively quiet landscape.

### 2.4 Landscape Character Sub Area: 8.4 – Slea Valley.

The North Kesteven Landscape Character Assessment sets out the following key characteristics of the landscape character area.

- Rising land to the north and south on either side of the shallow valley. Low lying land on the valley bottom rising gently on both sides. A characteristically narrow valley that flows east through the limestone escarpment at Ancaster.
- Area dominated by the main A153 road and railway line that follows the line of the valley along its entire length.

- A watercourse known as “The Beck” later becoming the River Slea, also follows the length of the valley floor but is not an obvious feature in the landscape.
- Small lakes in the centre of the valley corresponding to past gravel workings.
- Generally arable agriculture but also evidence of set a side and grazing which gives a much coarser appearance and texture to the landscape and less uniform in appearance.
- Valley sides generally open with little woodland cover to east although at western end of valley there are some mature hedgerows.(Ancaster sits adjacent to western end )
- Villages with attractive limestone buildings and distinctive spired churches (describing Wilsford although it is also appropriate for Ancaster.)

The key visual characteristic of the character area are:

- Views out from within the valley are limited. Neither the railway or the River Slea are significant visual features within the valley at its western end.
- Villages with attractive cores, limestone buildings and distinctive spired churches that are prominent visual features within the landscape.

The pertinent threats to the landscape character area as identified at both national and local level are:

- Resist pressure for development along A153 Road.
- Ensure new development is planned and executed to preserve a sense of place, sense of history, tranquillity and biodiversity while minimising water use and avoiding exacerbation of flooding and habitat fragmentation.

The location of the site is considered well planned. It clearly does not impart any physical or visual influence on the A153 or its corridor. The position of the site would potentially fill an illogical gap within the existing Ancaster village settlement edge and the Street scene of Ermine Street. Existing vegetation at the water course and road verge would be extended to create a more obvious, natural and visually pleasing element to the street. It would also act to successfully absorb both the existing edge of development as well as any new areas within this transition zone of built form and rural landscape edge.

Furthermore, provision of open space, the inclusion of locally and nationally important grassland areas and the strengthening and extension of indigenous vegetation in the form of hedgerows, woodland copse and wetland planting adjacent to the water courses would aid in absorbing development within the landscape. Careful positioning and association of

existing and proposed soft landscape elements would easily screen, buffer and absorb built form so enhancing the rural landscape character and distinctive edge of the village.

Sensible positioning of buildings and hard construction will avoid any issues of flood control. The incorporation of the landscape enhancement measures already identified above will as previously stated, buffer the site within the landscape structure of the wider landscape ensuring continued tranquillity. It will also improve and extend connectivity of existing landscape corridors and the increase in wildlife habitats and biodiversity.

- Enhance agricultural landscape connecting fragmented patches of limestone grassland, woodland and maintain the traditional fabric of the rural landscape.
- Replace hedgerows – replanting where these have been lost or damaged

The existing site can be seen to consist of relatively medium to low quality environment comprising horse grazing activities. It is observed that much of the site and its boundary zones are unmanaged, patchy and as such, in poor condition. Furthermore, the site as it stands does not support agriculture or enhance the agricultural and rural landscape to any significant degree.

Careful and sympathetic development of the site would therefore not detract from the physical and visual elements or flavour of the agricultural landscape in this location. Conversely, the inclusion of locally and nationally important grassland areas within the open spaces and the strengthening and extension of indigenous vegetation in the form of hedgerows, woodland copse and wetland planting adjacent to the water courses would enhance the environment. Fragmentation of the existing rural landscape at the edge of the Ancaster village edge would be addressed while existing hedgerows would be repaired, gapped up, re-managed and extended.

A strategic landscape enhancement scheme and management plan covering these important structural elements of the scheme will be agreed with the local planning authority and implemented by a management company. This will ensure the proposals establish and develop and are therefore sustainable. Furthermore, the main thrust of the plan will be to promote traditional and locally utilised landscape management practices.

- Enhance provision for access and recreation.

Appendix 3 shows that any potential development layout for the site will provide a significant area of publically accessible and usable open space. It is envisaged the open space will support passive recreational pursuits generated by both the existing Ancaster village settlement and any proposed residential development.

Furthermore, a footpath link will be created to join Ermine Street with the path that runs to the east of the site location. This will act to increase connectivity but specifically enhance provision for public access from the village settlement to the wider landscape.

- Protect and sympathetically manage geological features and historic features such as Ermine Street Roman Road, medieval earthworks, industrial buildings, historic dry stone wall networks and traditional villages.

It can be noted from Fig 3b. That the site is significantly separated, both visually and physically, from the location of the Ancaster village conservation area and scheduled ancient monument. (Roman Town and Ancaster village cross.). Furthermore, it does not influence or impinge in any way on the important views of the church, vicarage and roman town identified within the document "Ancaster Village Conservation Area – July 1982/June 2010."

It can therefore be concluded that development of the site will not influence these important and historic designations.

It can be seen that the wider landscape surrounding Ancaster village and the site reflects that identified within the area 3 "South Lincolnshire Edge" ( South Kesteven Landscape Character Assessment. However, The immediate vicinity of the site is far more representative of the character and arrangement shown with area 8.4 "River Slea" set out within the adjacent North Kesteven Landscape Character Assessment. Therefore the character of the site location can be described as a hybrid with partial characteristics of each component.

Furthermore, that the development proposals will ensure that there is a strong fit between the landscape character assessments and the site area. Furthermore, that the proposals do not interfere with the character or development threats and objectives of both national and local landscape character areas that the site sits within or influences.

The key characteristics at site level are:

- Short range views into and out of the site from existing development situated to the immediate west, north and south of the site boundary.
- Short range views into and out of the site from Ermine Street and the adjacent railway embankment to the north.
- A very limited number of glimpsed medium and long range views onto the eastern Ancaster village settlement edge from footpaths and areas of public access to the north-west , north, north-east , south and south-east.

A visual summary of these characteristic views are shown in Fig 2, 5 and 6

## 2.5 Geology, Soils and Landform.

The geology of this area is dominated by the presence of Jurassic limestone which forms a distinctive spine within the area running north from Grantham. The soils developed over the limestone are generally thin and well drained, particularly to the river valleys. Here sands and river gravels form a distinctive core through the central plateau.. However, glacial boulder clay drift and poorer drainage occur on some of the slopes.

Topography is significant within this area. To the north and south of Ancaster village. This is characteristically higher ground in excess of 100M above ordinance datum (AOD). These areas correspond to the limestone spine and escarpment described above. A noticeable gap in this higher land occurs at Ancaster village at the head of the River Slea. Here tributaries occupy a valley running approximately west to east across the landscape.

## 2.6 Vegetation, Farming Pattern and Field Enclosure

The area comprises a large scale open arable landscape. The higher ground on top of the escarpment consists of broad rectilinear fields under arable cultivation with some fragmented hedgerows and hedgerow trees. There are some shelter belts and small areas of woodland. Farms are isolated with some complexes of large scale agricultural buildings. Airfields are also a characteristic element within the landscape.

Within the valley field enclosure is naturally smaller and more informal in character. This area is also covered by blocks of woodland, scrub and hedgerows. Arable land use still occupies the valley sides although the floor is typically informal grassland, pasture and grazing.

## 2.7 Settlement Pattern

This area is sparsely populated with some isolated farms and properties. Settlement is mainly concentrated along the western edge of the character area at the boundary with corresponding “Trent and Belvoir Vales” character area and includes the villages of Fulbeck, Caythorpe and Honnington. The location of Ancaster village can be seen as being quite unique given its position on the valley floor.

Villages are mostly small and of varied form. Some have closely developed centres while others consist of a looser collection of buildings and properties. Villages are typically developed around a number of streets and none have significant and characteristic village greens. Typical building materials include limestone with pantile or slate roofs although modern twentieth century development is mostly brick.

## 2.8 Landscape Condition

Landscape condition is varied. Arable farming is still predominant and intensive on the escarpment. Generally farm buildings and complexes are in active use although some derelict structures do exist. A number of redundant complexes as well as old gravel and sand pits and quarries have been redeveloped for active and passive commercial recreational use. A number of airfields are now inactive.

Where vegetation forms an active element of the agricultural landscape ( i.e. shelter belts and woodlands and hedgerows) these are generally well maintained. This contrasts sharply with that seen within the valley floor. Here the introduction of horse grazing and other non-arable activities coupled with informal land use and patchy management has ensured erosion of the village edge landscape.

## 2.9 Trends for Change

The current trends are likely to continue over time. These include the conversion and construction of individual properties and agricultural buildings within the wider landscape. It will also create pressure on the edge of established settlements as disused sites become targets for redevelopment – particularly large and medium scale residential land use.

There will also be pressure to introduce new sporting land uses onto redundant sites including semi-rural pursuits i.e. paintballing. Alternative energy technology may also be considered (Wind and solar farms), particularly on the top of the escarpment.





**Fig Cp1 - looking east across site from Ermine Street :**  
Residential properties are visible on both northern and southern boundaries where built form sits comfortably within existing landscape structure. Rising ground to east coupled with strong vegetation belts restricts long and medium range views onto site from further east and south-east.

**Fig.Cp1.**



**Fig.Cp10.**

**Fig Cp10 - Eastern site boundary :**  
Footpath running to east of site boundary is well enclosed by existing vegetation. Gaps through allow views onto site.



**Fig.Cp11.**

**Fig Cp11 +12 - Adjacent residential development :**  
Images showing land use to areas directly abutting the northern and southern site boundaries. Typical late twentieth century medium density estate style housing to north( Cp11). Typical mid twentieth century single storey development set within established landscape framework to south (Cp12)



**Fig Cp2 - looking west and north-west from site boundary(Ermine Street) :**  
Existing residential properties on Ermine Street and gently rising ground to immediate west are afforded limited views of site. Beyond this the zone of visual influence is severely restricted. The existing settlement edge coupled with rising ground to the valley side and significant vegetation acts to preclude views onto the site from further west and north-west.

**Fig.Cp2.**



**Fig.Cp12.**



**Fig Cp3 - looking north from footpath running adjacent to eastern boundary :**  
The raised railway embankment coupled with strong existing vegetation creates visual "end stop". glimpses of the site are gained from trains running along the line its self. However, the embankment screens the site from viewpoints further to the north and north-east.

**Fig.Cp3.**



**Fig.Cp13.**

**Fig Cp13 - Street scene adjacent to site boundary Ermine Street :**  
Overriding impression is of built form set behind and within strong existing landscape structure. Site provides open gap within structure of built form partially obscured by vegetation to street. Buildings are visible to both sides of Ermine Street and to either side of site.



**Fig.Cp4.**

**Fig Cp4 - Looking north from site boundary (Ermine Street) :**  
Typical mid to late twentieth century residential estate housing sits immediately adjacent to site boundary. on both sides of road.( mix of styles and storey heights)



**Fig.Cp6.**

**Fig Cp6 - Looking north along Ermine Street towards western site boundary :**  
Existing water course crosses under road at southern site boundary. Significant tree cover to western site boundary against road.



**Fig.Cp8.**

**Fig Cp8 - Southern site boundary :**  
Existing residential properties sit adjacent to site boundary. Gaps within existing landscape structure enable built form to be visible.



**Fig.Cp5.**

**Fig Cp5 - Looking south from site boundary Ermine Street :**  
late twentieth century residential housing to with soft landscape framework to road frontage.



**Fig.Cp7.**

**Fig Cp7 - Looking east along southern site boundary :**  
Existing water course and indigenous vegetation belt defines site boundary.



**Fig.Cp9.**

**Fig Cp9 - Northern site boundary :**  
Residential properties front onto northern site boundary. Existing vegetation is sporadic but breaks up building line.



**Fig.Cp14.**

**Fig Cp14 - Ancaster village core :**  
Stone properties and other public buildings characterise the older areas of the village. These parts are physically and visually separated from the vicinity of the site. Consequently, proposed development would not influence or be influenced by the village core.

### 3.0 : Baseline Study

3.1 The site was visited in August 2016. On this day the weather was clear and bright with only occasional patchy cloud cover. The aim of the baseline study is to record the existing landscape and visual resources against which any potential impacts can be measured.

#### 3.2 Methodology

After an initial site walkover to identify key resources, the land form of the surrounding landscape was assessed and the visual envelope established.

The methodology of mapping visibility employed the manual approach as defined within section 6 of the Guidelines for Landscape and Visual Impact (Landscape Institute 3<sup>rd</sup> edition). Use of map interpretation and manual survey on site and within the adjacent landscape were utilised.

This approach advocates standing at the location of the development and looking out to identify map land that is visible from that and other points within the site. This establishes the outer limit or visual envelope of the land that may be visually connected with the proposal. This data was then cross checked by identifying potential viewpoints within the landscape i.e. from surrounding rights of way and assessing the views back towards the development site.

The location of these viewpoints is identified within Fig 4. The views obtained from these points are identified in visual form in Figs 5. Preparation of this material has been conducted in accordance with the Landscape Institute advice note 01/2011: Photography and Photomontage in Landscape and Visual Impact Assessment. Additional detail information pertaining to each viewpoint is shown on Figs 5.

The results of this exercise define the extent of the Zone of Theoretical Visibility (ZTV). This area so defined only identifies land from which the proposals may theoretically be visible. It is influenced entirely by terrain and does not take account of other factors within the landscape. I.e. buildings and vegetation.

Other elements within the surrounding landscape were then surveyed, mapped and their influence on the Zone of Theoretical Visibility added. Fig 4 identifies the extent of the visual baseline. The ZTV has been adjusted to show the extent of theoretical visibility and how this has been influenced and adjusted by all other factors within the landscape i.e. actual visibility.

In all aspects of ZTV mapping and site survey it is assumed that the observer's eye height is set at 1.5 – 1.7 Meters above ground level as stipulated by section 6 of the Guidelines for Landscape and Visual Impact (Landscape Institute 3<sup>rd</sup> edition).

The site and the surrounding landscape were then surveyed in detail and landscape and visual receptors identified and recorded.

Landscape receptors are defined as components of the landscape that are likely to be affected by the scheme.

Visual receptors are defined as people living and working within or passing through the area which will be affected by the changes in views and visual amenity. (Section 6 of the Guidelines for Landscape and Visual Impact (Landscape Institute 3<sup>rd</sup> edition).

The landscape receptors were then assessed in terms of their sensitivity in accordance with section 5 of the Guidelines for Landscape and Visual Impact (Landscape Institute 3<sup>rd</sup> edition).

This was achieved by combining professional judgements of their susceptibility to the type of change or development proposed and the value of the landscape and its environmental fit. An overall value for sensitivity was then apportioned to each receptor.

The visual receptors (each particular person or group of people likely to be affected at a specific viewpoint) was then assessed in terms of susceptibility to change in views and visual amenity – measured by the occupation and activity of people experiencing the view at particular locations, coupled with the extent to which their attention or interest may therefore be focused on the view and the visual amenity they experience at particular locations. This was then combined with the value attached to each view to give an overall value for sensitivity of each viewpoint. These results are identified in tabulated form.

#### 3.3 Tables 1 and 2 set out the baseline studies of the landscape and visual resources.

Table 1, The Landscape resource Study, describes the condition of the landscape elements within and immediately surrounding the site.

Table 2, The Visual Resource Study, records the views of the site from surrounding rights of way and within the zones of theoretical visibility (ZTV).

Within tables 1 and 2, the following terms are used:

- To describe environmental fit : strong, medium, weak
- To describe sensitivity: H=High, M-H= High to Medium, M=Medium, L-M= Low to Medium, L=Low
- To describe site visibility: continuous, partial – continuous, partial, poor – partial, poor.
- For the purposes of this report the value for sensitivity for each viewpoint is based on the following: a) Distance of the viewpoint from the site. b) How visible the site is from that viewpoint. c) The importance of the view i.e. is it influenced by important landscape designations ( AONB etc).

### 3.4 Topographic Survey

At this stage a formal topographical survey has not been undertaken. However, as previously stated a visual appreciation of local topography was undertaken as part of the base line survey. It is apparent that the site sits on the valley floor. Consequently, it is, for the purposes of this assessment, level. In detail it can be observed that the surface of the site falls very gently from the western boundary at Ermine Street towards the water course running along its eastern site boundary. This corresponds directly to the topography of the wider landscape ,as The Beck (River Slea)valley falls away to the east towards Sleaford.

### 3.5 Visual Envelope.

Fig 4 sets out the zone of theoretical visibility (ZTV's) as defined by topography. This has been refined as a result of other factors within the landscape: vegetation, buildings and enclosure etc. and forms the visual effects baseline as shown. Views within the ZTV are split into 4 categories. Order 1 ZTVs are strong views within 875m of the site, while Order 2 ZTVs are partial and/or minor views within 875m of the site. Order 3 ZTVs are strong views from between 875m and 2710m of the site and Order 4 ZTVs are partial and/or minor views from between 875m and 2710m of the site.

The topography associated with The Beck (River Slea) valley and the surrounding higher land greatly influences the site location.

The site sits entirely on the level floor of the valley. The valley sides rise steadily up to the plateau on both the north and the south. Furthermore, to the east of the site the river valley curves sharply north and south create a finger of higher ground that encloses and obscures the site from that direction. To the west the valley continues to run beyond the Ancaster village edge. Here ground is essentially flat and level when considered in relation to the site its self. Fig 3a shows the arrangement of site and topography.

The general alignment of topography in conjunction with the effect of built form situated on the immediate boundary of the site to the north, south and west coupled with the surrounding landscape structure acts to define the extent of the visual envelope and visual effects baseline. This is restricted to a very limited combination of order 1 and 2 ZTVs along Ermine Street, stretches of adjacent footpaths and roads as well as some adjacent residential dwellings and buildings to north. South and west. It should be noted that the valley sides in association existing vegetation and the railway embankment almost completely obscures the site from the wider landscape in all directions. Where level ground exists to the west the site is again screened by the presence of the Ancaster village settlement. To this end it can be seen that order 3 and 4 ZTVs are almost non-existent. This is shown clearly in Figs 4 and 5)

It can be seen that all viewpoints are subject to seasonal defoliation. Consequently, general visibility as shown would increase the intensity and extent of views onto the site from existing viewpoints, particularly order 1 and 2 ZTVs adjacent to the site where views from residential properties can be expected to increase within the extent of the visual envelope. It will, however, remain at its present level as in this case order 3 and 4 ZTVs as these are influenced more significantly by viewing distance from the site itself and topography.

### 3.6 Observations

As described in sections 3.3 to 3.5 and illustrated by Fig 3, 4 and 5, the topography surrounding the site in conjunction with built form and the presence of vegetation belts significantly restricts the extent of the zone of theoretical visibility (ZTV) and so the extent of the visual effects baseline.

On inspection it is apparent that strong views of the development site are extremely limited. Unimpeded views consist of those from Ermine Street its self as it passes the site boundary and also as it moves away from the site to north and south.

Significant views also extend to the properties that front onto the west of Ermine Street opposite and adjacent to the site location to the north. There are also strong but interrupted views from the footpath that runs to the east of the site, the railway line to the north and properties within the Ancaster settlement sitting on rising ground to the west, north-west and south-east.

From the footpath to the east views are generally gained through gaps in the existing vegetation so are limited in this way. However, where views do occur they are afforded extensive views of the site and surroundings.

The railway line also obtains strong views of the site although it should be appreciated that these again are short term and “glimpsed” from a moving train.

Properties situated away from the site boundary but sited on ground as it rises away from the flood plain can also be seen to obtain views of the site. However, in this case views are predominantly from upper storey and so “secondary” windows. Furthermore, the views although strong, will be limited in extent by built form that exists between the viewpoint and the site and the presence of extensive vegetation.

It can be seen that the Ancaster village settlement located to the west of the development site acts as an effective “end stop” to site visibility in these directions. The combination of built form in conjunction with significant areas of existing vegetation and the low lying, level topography acts to limit and reduce the extent and strength of the ZTV and visual effects baseline towards this direction and in the majority of cases removes it altogether.

Significant views of the site from intermediate and long range viewpoints are, as previously stated, almost non-existent. It is considered possible that some potential views could be obtained from higher ground of the valley side to the north-west and south-east. However, these would, at most, equate to the odd ridge line set within a strong existing soft landscape structure. Also they would be seen within an existing view that already consists of the extensive Ancaster village roof scape. In the context of this report these views could not be considered as resulting in any significant change and as such, are not important.

Occasional views from the wider landscape to north, east and south were also considered. However, in these cases it can be appreciated that views are of the general vicinity of the site area and occasional ridge lines of the adjacent Ancaster settlement edge in the distance rather than being site specific. The influence of topography, a significantly developed landscape structure along with the greater distances from the site render these views insignificant in terms of visual impact.



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**SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL**

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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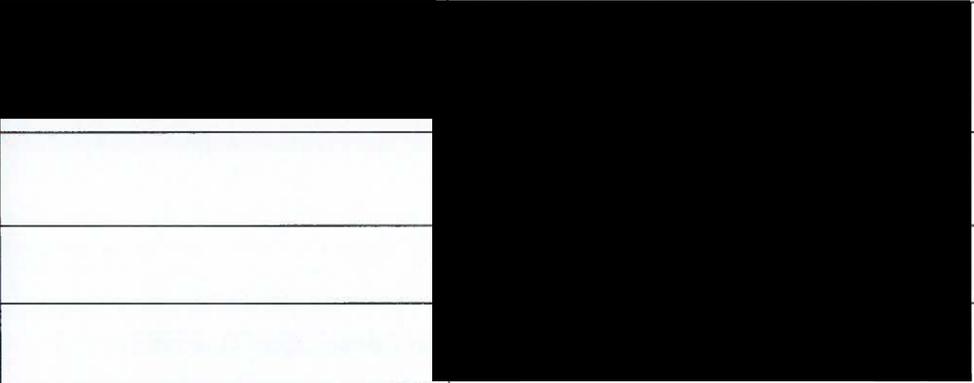
**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

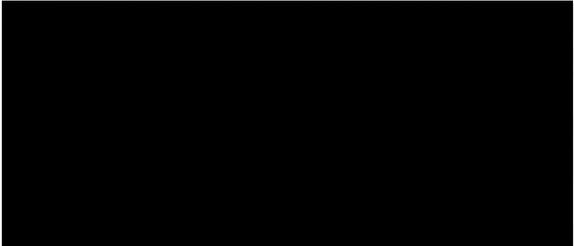
**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Mr	Mr
<b>First Name</b>	M J	Michael
<b>Last Name</b>	Dickinson	Braithwaite
<b>Organisation</b>		Robert Doughty Consultancy Limited
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone</b>		
<b>Email Address</b>		

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	19 November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>X</b>
If not please provide details.					
<p>The general approach of supporting growth and focussing that growth in the larger settlements, such as Bourne, is supported.</p> <p>The Vision, however, states that growth of Bourne during the plan period should be focussed to the East of the Town. This approach is not justified, however, on a number of grounds.</p> <p>The vision makes no reference to specific development opportunities around the town, such as the site at Park Farm, West Road, Bourne. The proposed focus on land to the east of Bourne could be based on the conclusion of the previous Sites and Settlements DPD process, which assumed that key sites to the west of Bourne, such as our client’s land at Park Farm, were constrained by the proximity of Bourne Woods and were not available for development. The basis for deciding to focus growth to the east of Bourne is not set out anywhere in the consultation documents. Indeed the Sustainability Appraisal report highlights issues with locating growth to the east of Bourne, but does not highlight the same level of concerns regarding development to the west.</p> <p>Our submission to the call for sites regarding land adjacent to Park Farm, Bourne (SKLP171) demonstrates the site can be developed appropriately without undue harm to Bourne Woods. This is contrary to the previous sites and settlements DPD(2016) consultation, which concluded proximity to Bourne Woods fundamentally undermined delivery of that site. Because there was no need to allocate further land in Bourne at that time, this issue was not explored any further. The Issues and Options consultation, however, promotes a higher growth target for Bourne, which will require new sites to be allocated.</p> <p>The emphasis on promoting allocations on land to the east of Bourne is based on a false understanding that sites to the west are constrained by proximity to Bourne Woods, it is fundamentally flawed. Land at Park Farm is accessible to the strategic road network: it has excellent connections to Bourne, is contained by development to the east and south and is screened by Bourne Woods. The site is capable of making a significant contribution to meeting growth targets for Bourne and must be included as a reasonable alternative development location. Failure to assess suitable sites will undermine the whole plan process. The option has not been considered through the Sustainable Appraisal which indicates that the land to the east is at risk of flooding.</p>					

## 6. Proposal 2 - Objectives

### Q2 – Objectives

Do you agree that the Objectives should remain the same for the new plan?

Yes	X	No		Unsure	
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If not please provide detail.

## 7. Proposal 3 – Policies not proposed to be changed significantly

### Q3 – Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No	X	Unsure	
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If not please provide details.

The list of policies not to be changed significantly is too extensive. The following policies will need to be amended:

Policy H1 needs to be updated to acknowledge any new allocations that will come forward through the current plan process.

Policy H2 should be amended to reflect the requirements of the NPPF, such as:

- 10% of dwellings should be available for affordable home ownership
- to facilitate build to rent scheme, and
- to allow for lower requirements for schemes that provide accommodation for a group of people with specific needs.

Policy BRN1 will need revising to reflect the changing growth target for the settlement and to identify any strategic directions for growth.

## 8. Proposal 4 – Plan Period

### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes	x	No		Unsure	
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If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

<b>Yes</b>		<b>No</b>	<b>x</b>	<b>Unsure</b>	
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If not, please provide details and any alternative proposals.

A blanket ban on the use of allocations in smaller settlements will not necessarily reflect the opportunity and needs presented by smaller settlements. Some small settlements contain brownfield or underused and derelict sites, development of which could be promoted and guided by a suitable allocation.

### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

Please provide details

The ability of developers to successfully develop new homes in an area is a fundamental concern, however, locality is unlikely to be prime determinant of this issue. Planning policy and land ownership are more significant factors. The plan should not seek to reinforce such concerns in locations where there is an identified need for new homes and other forms of development. Planning Policy should seek to overcome blocks to necessary development, not impose a new constraint.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).

### 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

#### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	x	Unsure	
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If yes, please provide details.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

#### 14. Proposal 10 – Climate Change

##### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	x
-----	--	----	--	--------	---

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No	x	Unsure	
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##### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

Please give details.

##### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

#### 16. Proposal 12 – Need for Caravan Accommodation

##### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	x
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Please give details

### 17. Proposal 13 – Parking Standards

#### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	x
-----	--	----	--	--------	---

Please give details

Any approach that may be adopted must be agreed between the Local Planning and Highways Authorities to avoid future confusion.

### 18. Any other Comments

#### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

## Part C: Sustainability Appraisal Scoping Report

### 19. Comments about the Sustainability Appraisal Scoping Report

The Sustainability Appraisal Scoping Report (SA) considers the level of growth promoted in the Issues and Options consultation. The preference set out in the Issues and Options document for development to take place to the east of Bourne, however, it is not referenced in any way. The strategy for delivering growth around Bourne should be subject to assessment through the SA process.

The Scoping report concludes that land to the east of Bourne is at risk of flooding, whereas land to the west of the town, such as the land at Park Farm, is less constrained by Flood Risk. Focussing development to the east of the town would appear to be at an increased risk of flooding and therefore less sustainable.

The SA concludes that land to the west of Bourne is Agricultural Grade 2 (best and most versatile) land and should be protected. This may be the case, but this assessment does not take into account the characteristics of different sites. Park Farm (SKLP171), for instance, is a relatively small site, compared to the amount of best and most versatile agricultural land, contained by development to the east and west and is crossed by a Public Right of Way. It is not an efficient area to farm, as illustrated by the fact it is rented on an annual grazing licence and is not farmed more intensively. Whether or not the soil is classified as Grade 2, the site does not form a viable agricultural unit. Agricultural land classification should not be considered against development potential of individual sites without taking into account the specific classifications of the land.

**Thank you for responding to this consultation.**





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DISTRICT  
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ADD:

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name		Michael
Last Name		Braithwaite
Organisation	Gibbons (Holdings) Limited	Robert Doughty Consultancy Limited
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Postcode		
Telephone		
Email Address		

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

**If you do not wish to be added or would like your details to be removed, then please select the following box**

*Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.*

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	19/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
<b>Yes</b>		<b>No</b>	<b>x</b>	<b>Unsure</b>	
If not please provide details.					
The list of policies not to be changed significantly is too extensive. The following policies will need to be amended:					
<p><u>Policy H1</u> needs to be updated to acknowledge new allocations that will come forward through the current plan process.</p> <p><u>Policy H2</u> should be amended to reflect the requirements of the NPPF, such as:-</p> <ul style="list-style-type: none"> <li>• 10% of dwellings should be available for affordable home ownership</li> <li>• to facilitate Build to rent scheme, and</li> <li>• to allow for lower requirements for schemes that provide accommodation for a group of people with specific needs.</li> </ul>					

**8. Proposal 4 – Plan Period****Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If not please provide details

**9. Proposal 5 – Settlement Hierarchy****Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input checked="" type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement****Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

## 11. Proposal 7 – Distribution of Growth

### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

### Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

A blanket ban on the use of allocations in smaller settlements will not necessarily reflect the opportunity and needs presented by smaller settlements. Some small settlements contain brownfield or underused and derelict sites, development of which could be promoted and guided by a suitable allocation.

### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please provide details

The ability of developers to successfully develop new homes in an area is a fundamental concern. Locality, itself, however, is unlikely to be prime determinant of this issue. Planning policy, existence of small and medium sized developed and land ownership are often more significant factors. The plan should not seek to limit development opportunities in locations where there is an identified need for new homes and other forms of development. Planning Policy should seek, in partnership with other measures, to overcome blocks to necessary development, not impose a new constraint.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

<b>Yes</b>		<b>No</b>	<b>x</b>	<b>Unsure</b>	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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If not, please provide details.

**14. Proposal 10 – Climate Change****Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>x</b>
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

**15. Proposal 11 – Energy Performance Standards****Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No	x	Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation****Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	X
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Please give details

**17. Proposal 13 – Parking Standards****Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	x
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Please give details

Any approach that may be adopted must be agreed between the Local Planning and Highways Authorities to avoid future confusion.

## 18. Any other Comments

### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

## Part C: Sustainability Appraisal Scoping Report

### 19. Comments about the Sustainability Appraisal Scoping Report

The Sustainability Appraisal Scoping Report (SA) considers the level of growth promoted in the Issues and Options consultation.

The SA specifically addresses the level of growth to be promoted in larger villages, such as Langtoft. Three options are assessed as follows:

LV1 – Continue to plan for a level of housing growth

LV2 – Renew and increase the focus for growth in the larger villages

LV3 – Limit the growth in the larger villages

When considering these options the SA explores a number of factors inform the decision on which option to choose. We have some comments on the analysis used in a number of sections which should result in a more informed decision:

**Ecology** - The SA states the village is close to the Langtoft Pits SSSI and lies within the IRZ, which may limit growth potential in the settlement. However, natural succession is causing secondary woodland to develop, causing shading of the water bodies and deep layers of leaf litter. This has led to a change in the water chemistry, and most pits have very low levels of dissolved oxygen. The current and future condition of the lagoons may lead to the removal of the SSSI designation. The presence of the SSSI should not result, as is suggested in the SA report, in a reduced focus on growth in Langtoft. All analysis should take into consideration the current condition of any SSSI.

**Landscape** - The SA suggests that increased growth around villages, such as Langtoft, may adversely impact on landscape character in the area. However, some villages provide opportunities for growth that will have negligible impact on landscape character. The former gravel pits on Stowe Road, Langtoft are screened by the lagoons formed by the historic quarrying and, as concluded in the committee report for a planning application for 35 dwellings on part of the site (S17/1900), it can be developed with minimal impact on the surrounding area. The former quarry offers other opportunities for growth with limited to no impact on the wider landscape. The SA should take into full consideration local landscape conditions and not apply a blanket assessment.

**Water Quality** - The SA suggests that new development will increase the likelihood of negative effects on surface water bodies in the area. However, this risk is reduced significantly by the requirement to incorporate SuDS within new development. These measures hold back water to existing runoff rates and also cleanse the water of solids and pollutants. Use of these measures will limit the risk of increased discharge of polluted water into existing water bodies. Any consideration of impact on water quality should take into full account the on-site measures that are required in all developments to control surface water runoff in terms of quality and quantity.

**Land Quality** - The SA highlights the importance of agricultural land and the lack of brownfield land in the larger villages. Some settlements, such as Langtoft, do contain previously developed land, such as the former gravel pits on Stowe Road. Although this site is a restored quarry and does not

fall in the definition of Previously Developed Land, it is made land and of low agricultural land value. Any assessment of the distribution of growth across South Kesteven should take account of the availability of sites of little to no agricultural value should not rely on a very high level assessment of land quality to sieve out whole communities.

Heritage - When discussing the Historic Environment, the SA raises concerns that development may impact on listed buildings within Langtoft. We note, however, that the listed buildings are focused around the historic core of the settlement. A settlement the size of Langtoft offers many opportunities for development that will have minimal, if any, impact on the listed buildings. The former gravel pits on Stowe Road is one such example. The SA should not assume whole settlements are unsuitable for development because of a concentration of listed buildings in one, when development could take part in most of the settlement without any impact on the listed buildings.

**Thank you for responding to this consultation.**



Our Ref: MV/ 15B901605

20 November 2020

South Kesteven District Council  
[planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)  
via email only

Dear Sir / Madam  
**Local Plan Issues & Options Consultation**  
**October – November 2020**  
**Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

#### **About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

#### **National Grid assets within the Plan area**

Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the Plan area.

Details of National Grid assets are provided below.



### **Electricity Transmission**

<b>Asset Description</b>
4VK ROUTE (TWR 001 - 001B): 400Kv Overhead Transmission Line route: COTTAM - EATON SOCON - WYMONDLEY 2

### **Gas Transmission**

<b>Asset Description</b>
Gas Transmission Pipeline, route: HATTON TO PETERBOROUGH 1
Gas Transmission Pipeline, route: HATTON TO PETERBOROUGH 2
Gas Transmission Pipeline, route: SILK WILLOUGHBY TO STAYTHORPE PS

A plan showing locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

Please also see attached information outlining further guidance on development close to National Grid assets.

### **Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:

**Matt Verlander, Director**



**Spencer Jefferies, Town Planner**



If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI  
Director**

  
For and on behalf of Avison Young



## Guidance on development near National Grid assets

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

### Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

### How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

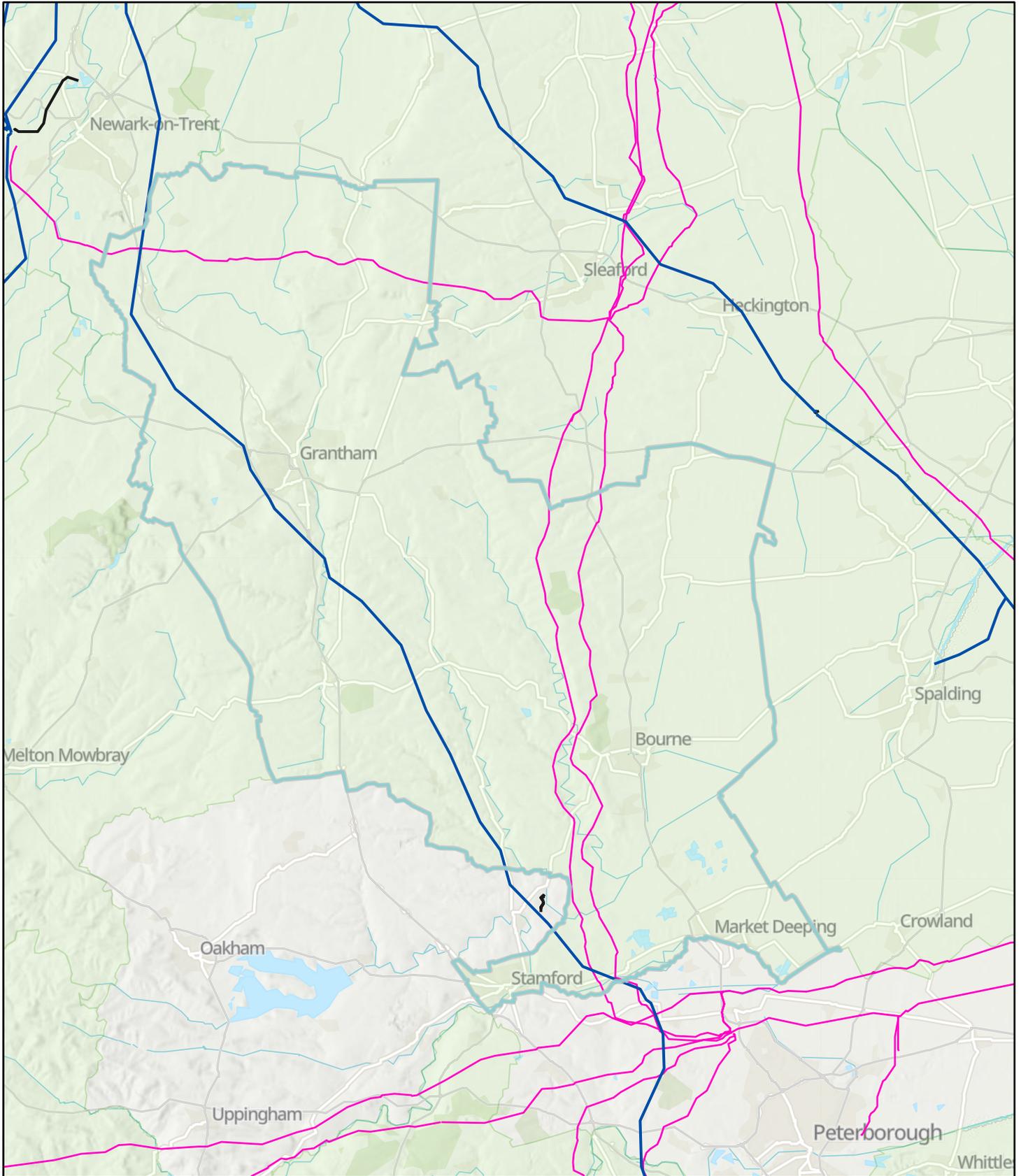
- National Grid's Plant Protection team: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

or visit the website: [REDACTED]

[REDACTED]

# South Kesteven Local Plan Issues and Options Consultation



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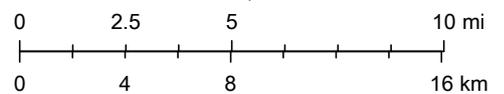
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— Gas\_Assets\_6495

Development\_Plan\_Monitoring\_v2\_977\_5701

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CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Mr	Miss
<b>First Name</b>	Ivor	Charlotte
<b>Last Name</b>	Crowson	Bailey
<b>Organisation</b>		DLP Planning Ltd
<b>Address</b>	C/O Agent	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 2px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 2px;"></div> <div style="background-color: black; width: 150px; height: 15px; margin-bottom: 2px;"></div> <div style="background-color: black; width: 50px; height: 15px;"></div>
<b>Postcode</b>	C/O Agent	<div style="background-color: black; width: 70px; height: 15px;"></div>
<b>Telephone</b>	C/O Agent	<div style="background-color: black; width: 100px; height: 15px;"></div>
<b>Email Address</b>	C/O Agent	<div style="background-color: black; width: 280px; height: 15px;"></div>

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 250px; height: 50px;"></div>	20/11/2020

## Part B: Issue and Options Consultation Questions

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

7. Proposal 3 – Policies not proposed to be changed significantly					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<p>We do not agree with the list of Local Plan policies, which are not proposed to be changed significantly. We have particular concern with the Policy SP3 as adopted. We strongly believe that Policy SP3 should be amended in order to be less restrictive and more positively prepared.</p> <p>Whilst we welcomed the Council’s intention in principle to allow infill development in small settlements as expressed in the now adopted Local Plan, we object to the current definition of ‘infill development’ which we deem to be restrictive. The nature of rural settlements and potential development opportunities within them are varied and ‘infill’ plots do not always comprise frontage development, therefore policy should reflect/accommodate this. Part ‘a.’ of the adopted policy currently restricts development on these sites which would otherwise help to maintain the vitality of the community and make an important contribution to the supply of housing land in the District in line with the Vision and Objectives of the Plan.</p>					

We acknowledge that the policy should ensure that proposals respect the scale, form and density of the surroundings and enhance the character and amenity of the community. However, the policy should recognise that there are sites in the small villages, which although are not strictly within the built up frontage, should be acceptable development sites if for example they comprise previously developed land or are part of an established residential curtilage and therefore are demonstrably not 'open countryside'. These sites can still make an important contribution to the delivery of sustainable development insofar as the opportunity to introduce new households into a smaller community, can help boost its viability and character as a community but widening the diversity of residents – often helping to mitigate an aging population.

In respect of Policy H4 (Meeting All Housing Needs), we support the ongoing inclusion of this policy on the basis that it seeks to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities across both rural and urban parts of the district.

### 8. Proposal 4 – Plan Period

#### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

### 9. Proposal 5 – Settlement Hierarchy

#### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

If not, please provide details of what changes you think should be made.

Whilst we broadly agree with the adopted Settlement Hierarchy, we do not agree with the approach to limiting development in smaller villages, including West Deeping to infill development in line with policies SP3 unless this policy is amended to reflect our concerns raised in respect of this policy.

It is important that the Plan allows for modest, but sensitive developments within small villages, such as West Deeping, so that communities can positively respond to the housing needs of their people and fulfil their role as sustainable communities.

#### Q5b – Settlement Hierarchy Methodology

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details of what changes you think should be made.

### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	✓
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If so, please outline any suitable and deliverable proposals.

### 10. Proposal 6 – Housing Need and Requirement

#### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No	✓	Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

We object to the use of 754 dwellings per annum as the identified housing need and requirement for South Kesteven. As part of the Government's reforms they have proposed a new 'standard method' for assessing the baseline housing need.

Currently, the Local Plan delivers 650 dwellings per annum and the current standard methodology figure is 754 dwellings (using the 2014-based household projections and the latest affordability ratio (2018)), to which the Issues and Options Report addresses.

However, whilst the standard methodology approach is yet to be finalised by Government, affordability has gradually got worse over the last 10 years, specifically in the East Midlands and it is likely that the approach will lead to the need for specific policy action. It is our view that this is likely to amount to a level of housing significantly higher than that allowed for in the current Local Plan and at this stage it is too early to determine what the figure might be. The initial iteration of the Plan Review may therefore need to provide significant justification for the level of housing it proposes but we consider that this should seek to address affordability as a priority.

### 11. Proposal 7 – Distribution of Growth

#### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

#### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

We have significant concerns over the Council’s approach to not making allocations in smaller settlements. The current Local Plan makes provision for 4% of its housing requirement in the ‘Smaller Villages tier’, reflective of its vision and objections to ensure that those villages retain their vitality and diversity.

If the Council are reliant on development coming forward as ‘windfall’ development in line with the provisions of policies set out within the Local Plan, specifically Policy SP3, then we would ask the Council to revisit this policy in line with concerns raised in response to question 3.

It is likely that there will be a significant increase in the scale of housing grown planning for South Kesteven and the risk of not allocating sites or providing a portion of development to Smaller Villages could lead to those settlements struggling to retain the level of services and facilities that currently exist.

It is important that the Plan allows for modest, but sensitive developments within small villages, such as West Deeping, so that communities can positively respond to the housing needs of their people and fulfil their role as sustainable communities with opportunities in housing created suitable for all demographic sectors and addressing affordability needs.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	✓
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Please provide details

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	✓
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	✓
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	✓
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If not, please provide details.

**14. Proposal 10 – Climate Change****Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	✓
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	✓
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	✓
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Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	✓
-----	--	----	--	--------	---

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	✓
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Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Not at this stage.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

No specific comment to make.

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0035

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

### Part A: Personal Details

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	James	
Last Name	Mason	
Organisation	Stamford Civic Society	
Address	██████████ ██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
Email Address	████████████████████ ████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

### 3. If you are not already on our consultation database and you respond your details will automatically be added to the database

If you do not wish to be added or would like your details to be removed, then please select the following box

*Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.*

### 4. Please Sign and date this form

Signature (please type for an electronic response)	Date
██████████	20 November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	Yes	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	Yes	No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	Yes	No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	Yes	No		Unsure	
If not please provide details.					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	Yes	No		Unsure	
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes	Yes	No		Unsure	
If not, please provide details of what changes you think should be made.					
<b>Q5b – Settlement Hierarchy Methodology</b>					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes	Yes	No		Unsure	
If not, please provide details of what changes you think should be made.					
<b>Q5c – New Settlement</b>					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes		No	No	Unsure	
If so, please outline any suitable and deliverable proposals.					

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	Yes	No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	Yes	No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	Yes	No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

Please provide details

It is particularly important to carry out in-depth research to ensure the areas have provision of adequate sustainable social amenities such as schools, healthcare, waste disposal, green spaces, community meeting facilities and also consider local transport implications in a wider sense. Further, recognition of the conservation status of neighbouring areas to identified areas for development must be taken into account.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	No	Unsure	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	Yes	No		Unsure	
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If not, please provide details.

<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?					
Yes	Yes	No		Unsure	
If not, please provide details.					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
Yes		No		Unsure	Unsure
If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?					
Yes		No		Unsure	Unsure
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes		No		Unsure	Unsure
Please give details.					

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	No	Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	Unsure
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Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**



20 November 2020

FAO: Planning Policy,  
South Kesteven District Council,  
Council Offices,  
St Peters Hill,  
Grantham,  
Lincolnshire, NG31 6PZ.

Dear Sir / Madam,

**Local Plan – Issues & Options Document Consultation**

Please find attached the observations and comments of Stamford Town Council's Planning Committee in response to the consultation in respect of the Local Plan – Issues and Option document.

In addition, the Committee would like to see the Town of Stamford grow through a sustainable Urban Extension to the North and East Quadrant of the town, providing an infrastructure of roads to support a northern by-pass from the A1 north of Casterton. This would offer potential sustainable employment development land, making way for technology companies to settle in the area to deliver skills and training to support technology-based industries.

It is considered that this imaginative East/West by-pass corridor could provide an opportunity to reduce traffic through Stamford considerably, Stamford being the very first designated conservation town in the country.

Yours sincerely



Patricia Stuart-Mogg  
Town Clerk

Attached – response to Local plan



EMPLOYER RECOGNITION SCHEME

SILVER AWARD WINNER 2019  
PROUDLY SUPPORTING THOSE WHO SERVE.

**South Kesteven Local Plan  
Issues and Options Report October 2020  
Observations by members of the Planning Committee, Stamford Town Council**

Members of STC Planning Committee met in November 2020 and while they generally support the amendments to the SKDC Local Plan, they have made the following observations in response to the questions asked in the Issues and Options document.

**1a. Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.**

It is strongly felt that the SKDC Local Plan's proposals have never sufficiently dealt with the planning and traffic issues for Stamford. However, with regard to updates to the Plan prompted by the stated variables, we agree.

**1b. Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District? If not please provide details.**

With regard to the economic recovery of the district this will be dealt with by making efforts to maintain existing jobs, rather than simply concentrating on relocation/redeployment/retraining. With regard to climate change, the Climate Action Groups at SKDC and STC should be consulted on all future plans and proposed initiatives.

**2. Do you agree that the Objectives should remain the same for the new plan? If not please provide details.**

We agree.

**3. Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.**

We agree. However, there could be a move towards sustainable transport in Stamford, as is outlined for Grantham. Stamford's public transport services are very poor, especially given the proposed growth expected over the next decade.

**4. Do you agree with the proposed plan period up to 2041? If not please provide details**

We agree that the plan period should be rolled forward but are concerned about the proposed level of housing development for Stamford. We are expected to grow from a town of 20,000 (plus around 12,000 in the surrounding villages), to a population of around 40,000 inclusively by 2050.

**5a. Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.**

The settlement Hierarchy needs to take into account the rapid growth of Stamford in the last ten years, and it is strongly felt that the proposed 18% increase in housing has the potential to overburden the infrastructure and change the unique character of the town.

**5b. Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review? If not, please provide details of what changes you think should be made.**

No comment.

**5c. Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles? If so, please outline any suitable and deliverable proposals**

No comment.

**6. Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?**

In principle, more houses are needed and (where possible) should be built. However, Stamford has an extremely serious traffic flow and traffic volume problem, with several serious bottlenecks within the town. Further building in Stamford needs to take these issues into account and levels should not be increased until the traffic problems are improved. Stamford Town Council fully supports the proposal made by Tallington Parish Council for a by-pass. See more about this in Question 14 – *‘Is there anything else you would like to raise?’*

**7a Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals.**

We agree.

**7b. Do you agree that Grantham/Stamford/Bourne and the Deepings should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals.**

As outlined in response to Question 6, Stamford has seen a large volume increase in Housing development over the past decade and the infrastructure as it stands will not be able to sustain an 18% increase in housing stock.

**7c. Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities? If not, please provide details and any alternative proposals.**

No comment

**7d. Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”? If not, please provide details and any alternative proposals.**

We agree.

**7e. Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

We agree.

**8. Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations? If yes, please provide details.**

We are not aware of any specific needs for Gypsy and Traveller accommodation in Stamford

**9a. Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable? If not, please provide details.**

We agree.

**9b. Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study? If not, please provide details**

E3 does not cover Stamford.

**10. Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change? If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

SKDC has recently declared a climate emergency and in accord with this, all planning and development should be subject to the highest scrutiny and standards. In addition, input should be sought from the Climate Action Groups at SKDC and STC around any proposed policies or developments.

**11a. Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

Yes.

**11b. Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

Yes. Heat pump technology, for example, in manufacturing would enable recycled energy to be used for other purposes. Energy performance only gets better by setting higher standards.

**11c. If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

Partly answered in 11b, but there are very many new initiatives, such as roof tiles made from energy transfer materials. Developers could also be asked to contribute toward energy-saving measures in the local community as part of the practice of granting planning permission.

**12. Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

No.

**13. Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

All new residential and commercial developments should have adequate levels of parking allocated. Applications for proposed development without sufficient provision of parking should be refused.

**14. Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

One of the biggest problem facing Stamford is the severe traffic congestion in around the town centre and the level of pollution that creates. One of the main areas of concern relates to the volume of traffic around the town bridge which carries traffic from the north, south and east. Over the last decade with the rapid expansion of the town and the outlying villages congestion has increased with traffic having to come through the heart of the town to be able to access the A1 and the other major trunk roads.

Stamford Town Council welcomes the proposal from Tallington Parish Council to introduce a by-pass. This proposal was circulated at a council meeting and was supported unanimously.

For Official Use Only:

REF: SK.IAO.0037

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

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**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

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**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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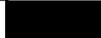
**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

## Part A: Personal Details

	1. Personal Details	2. Agents Details (if Applicable)
Title		
First Name	Kim	
Last Name	Miller	
Organisation	National Trust	
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

## 4. Please Sign and date this form

Signature (please type for an electronic response)	Date
	20/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	X
If not please provide details.					
National Trust agrees that the Vision should remain broadly the same. However, the Vision refers to ‘further significant residential development to the north and north-west of the town’. If the development referred to in the north of the town is the 480 homes with outline consent on land off Longcliffe Road then this statement will need to be kept under review. If at the time the new Local Plan is adopted the housing has already been delivered then the reference should be deleted to ensure that the plan does not promote further speculative housing development to the north of the town, close to the highly significant and sensitive heritage assets of Belton House and Park.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	X	Unsure	
If not please provide details.					
Bearing in mind the recent declaration by the Council of a climate emergency there is also an opportunity to include a bold statement about how the Council aims to address associated issues through good spatial planning and how it will seek to achieve its net zero carbon target.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	X
If not please provide details.					
The Objectives are largely supported by the National Trust.					
Objective 2 could be expanded to refer to green recovery, for example providing support for sectors involved in environmental technology including appropriate decentralised and renewable energy. The final bullet point could also be amended to reflect the new direction contained in the Agriculture Act 2020 in respect of forms of agriculture that deliver public goods by enhancing natural and cultural assets.					
National Trust particularly supports Objective 12, 13, 14 and 15 relating to environmental protection and enhancement, climate change, prudent use of resources and minimisation of pollution.					

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes	X	No		Unsure	
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If not please provide details.

National Trust supports the retention of Policy GR1 'Protecting and enhancing the setting of Belton House and Park' with reference to the associated setting study. This has provided a guide and reference point when understanding the impacts of proposed developments on Belton House (Grade 1 listed) and Park (Grade 1 Registered Historic Park and Gardens).

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	X	No		Unsure	
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If not please provide details

We agree that the plan should meet the NPPF requirement in terms of timescale. However, the Council will also need to bear in mind the Government's recent proposals for planning reform contained in White Paper *Planning for the Future* (which proposes five year reviews) and be prepared to swiftly adapt to a new format and process if necessary.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	X	No		Unsure	
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If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	X
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	X
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	X	No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

The Council will need to keep its housing need figure under review as the Government revises its standard calculation method.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	X
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If not, please provide details and any alternative proposals.

The proposed housing distribution should preferably take account of the needs of particular settlements, and their constraints, rather than simply rolling forward the existing pattern. Otherwise future iterations of the plan may fail to deliver sustainable development.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	X
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If not, please provide details and any alternative proposals.

See comment above

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	X
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If not, please provide details and any alternative proposals.

See comment above

#### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

#### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

### 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

#### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	X	No		Unsure	
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If not, please provide details.

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	X	No		Unsure	
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	X
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

National Trust supports South Kesteven’s existing climate change policies.

New and emerging legislation (such as the Agriculture Act and Environment Bill), national policy, guidance, and papers (such as the Ten Point Plan) will indicate the Government’s direction of travel.

A review of climate change related policies in other recently adopted and emerging plans may also be a way of identifying additional ways of addressing climate change through spatial planning.

The National Trust would also support environmental measures to mitigate and adapt to climate change such as new wetlands or community woodlands.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Yes		No		Unsure	X
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	X
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Please give details.

National Trust would welcome higher standards for residential and non-residential development bearing in mind the urgent need to tackle climate change. However the Council will need to satisfy itself that this will not unduly affect the deliverability of the plan.

The Government's Future Homes Standard is likely to set the direction, as referred to in the recent 10 point plan (see section 7) <https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution/title#point-7-greener-buildings>.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

See comments above.

If necessary due to viability issues, a higher energy performance level could be incorporated into the plan as an aspiration – that will weigh in favour of a proposal in the planning balance – rather than a strict requirement. Viability will vary between sites and developments depending on the local circumstances.

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	X
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Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

Thank you for responding to this consultation.

For Official Use Only:

REF: SK.IAO.0038

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	Mr
First Name	Mark	Richard
Last Name	Bennett	Bailey
Organisation	Defence Infrastructure Organisation (DIO)	Homes England
Address		<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 20px; height: 15px; display: inline-block; margin-right: 5px;"></div> <div style="background-color: black; width: 40px; height: 15px; display: inline-block;"></div>
Postcode		<div style="background-color: black; width: 50px; height: 15px;"></div>
Telephone		
Email Address		<div style="background-color: black; width: 100%; height: 15px;"></div>

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 100%; height: 15px;"></div>	20/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
<b>Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>x</b>
<b>If not please provide details.</b>					
<p>Homes England and the DIO broadly support the vision, including identifying the key role Grantham plays as the Sub-Regional Centre, which should continue to be the focus of development as the most sustainable location for growth in the district. Its regional influence should further be reflected and enhanced through policies of the Local Plan.</p> <p>It is important that sufficient policy weight is given to supporting housing and employment growth to reflect and strengthen the role of Grantham in the district and to support the Council’s vision.</p> <p>In addition, it is considered that the vision should recognise the role of major strategic sites at the south of the town in delivering the Council’s vision. Whilst Spitalgate Heath is currently referenced, this should also include Prince William of Gloucester Barracks, which is of strategic importance and therefore should be referenced. This site has a strategic role in delivering housing and employment generating uses as well as supporting infrastructure delivery. At the examination of the Local Plan, the Inspector noted the positive role that Prince William of Gloucester Barracks can play in delivering the plan (paragraph 87), and this should be reflected in the vision.</p>					
<b>Q1b – The Vision</b>					
<b>Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?</b>					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
<b>If not please provide details.</b>					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
<b>Do you agree that the Objectives should remain the same for the new plan?</b>					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
<b>If not please provide details.</b>					

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<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
<b>Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?</b>					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
<b>If not please provide details.</b>					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
<b>Do you agree with the proposed plan period up to 2041?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>X</b>
<b>If not please provide details</b>					
<p>Paragraph 22 of the NPPF outlines that <i>‘Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure’</i>. On the basis that SKDC intends to adopt the new Local Plan by the end of 2024, the Local Plan would meet the NPPF minimum 15 year period of coverage from adoption.</p> <p>However, the NPPF (footnote 35) recognises that the delivery of large-scale developments may need to extend beyond an individual plan period. Given that a number of allocations, such as Prince William of Gloucester Barracks, are allocated and projected to continue housing delivery well beyond the current plan period, Homes England and the DIO consider that the plan period could look forward further beyond 2041 to ensure that the Local Plan provides a framework for the long term delivery of new homes. This would provide a more positive context to support future growth and ensure a greater level of certainty to support the delivery of infrastructure and strategic sites, which are fundamental to the Council’s longer-term growth ambitions and also make the Local Plan more resilient to change and fluctuations in delivery.</p>					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
<b>Do you think the Settlement Hierarchy should be retained in the new Local Plan?</b>					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details of what changes you think should be made.</b>					

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	X	Unsure	
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If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	X
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If not, what evidence do you have to justify an alternative need and requirement?

In accordance with Paragraph 60 of the National Planning Policy Framework (NPPF), Homes England and the DIO agree with the use of the standard method in National Planning Guidance to determine the number of homes needed. However, the 754 dwellings per annum should be viewed as a minimum.

The latest 2019 outputs for the Housing Delivery Test confirms that a 20% buffer is necessary in calculating the 5 year supply taking into account past under delivery. Based on the 2020 Annual Position Statement where the 5-year deliverable supply was marginal, it is considered that the Council may not be able to currently demonstrate a 5-year supply based on the higher target of 754 dwellings per annum.

Based on past trends of under delivery and the need to provide a 20% buffer, it is considered that the new Local Plan should provide a positive policy framework to facilitate the delivery of large

strategic sites at pace. Sites such as Prince William of Gloucester Barracks have already been tested through the preparation of the adopted Local Plan and have been considered sound by the Local Plan inspector. They could be delivered at pace to help ensure that the Council maintains a 5 year supply of deliverable sites. This is important to ensure that the Local Plan remains up to date and effective in determining applications and delivering the Council's strategy and housing growth ambitions.

This would enable the Council to quickly respond to fluctuations in delivery and would be consistent with the presumption in favour of sustainable development in the NPPF which is a key material consideration for both plan-making and decision-taking. Specifically, in relation to plan-making, paragraph 11 of the NPPF states that this means that: *"plans should positively seek opportunities to meet the development needs of their area."*

## 11. Proposal 7 – Distribution of Growth

### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

Homes England and the DIO support the settlement hierarchy which continues to identify Grantham as a focus for growth. However, it is considered that the 50-55% proportion of housing growth distributed to Grantham could be increased to provide a more deliverable plan reflecting the availability of existing strategic sites allocated in Policy GR3. There would be several advantages to giving greater weight to Grantham:

- It would support the Local Plan vision and identification of Grantham as sub-regional centre and therefore the most sustainable location for growth in the district.
- The availability of sites such as Prince William of Gloucester Barracks which have already been tested through the preparation of the adopted Local Plan and been considered sound by the Local Plan inspector, noting the positive role that PWGB can play in delivering the plan (paragraph 87).
- Prince William of Gloucester Barracks is already identified to deliver some homes in the current Local Plan period but anticipated yields beyond the plan period could be brought forward earlier to help meet the upward pressure on housing demand. The Local Plan inspector noted that Homes England's involvement in the site could accelerate delivery (paragraph 86). They can be delivered at pace to respond to fluctuations in supply and help to maintain a deliverable five-year supply/meet HDT requirements.
- The NPPF (paragraph 72) recognises the benefits of large-scale developments in supplying large numbers of homes and delivering key infrastructure which Grantham can deliver through sites such as Prince William of Gloucester Barracks.
- There is significant land at Prince William of Gloucester Barracks free of overriding constraints and within single ownership. The site is deliverable and available for development now. Please refer to our response on Call for Sites submission and our progress in preparing an outline application.

### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

#### Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

#### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

#### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

## 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
If yes, please provide details.					

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No	X	Unsure	
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If not, please provide details.

It is noted that the Council proposes to undertake a review of the Employment Land Study 2015, with consideration given to the de-allocation of employment sites identified under Policy E3. Prince William of Gloucester Barracks is identified as one of those employment sites, providing 8ha of land.

The housing allocation policy GR3-H4 also covers the whole site, and separately requires that:

*‘The development must ensure that the following key elements are provided:*

*a. A new employment generating area of about 8 hectares located to optimise access to the A52 in order to support the development of a sustainable community...’*

Whilst Homes England and the DIO do not raise issue with a review of the Employment Land Study 2015 to update requirements for employment land within the district, it is important that this does not result in the de-allocation of any part of Prince William of Gloucester Barracks site. The approximate mix of uses at Prince William of Gloucester Barracks site is currently being considered through the masterplanning exercise and therefore the extent and mix of employment generating uses will be considered as part of a site wide solution for the residential-led urban extension.

Therefore, irrespective of whether sites are de-allocated under Policy E3, it is important that flexibility is retained in the plan to ensure that a sustainable community can be created and the final scheme can be responsive to changes in the market. Any de-allocation of the Prince William of Gloucester Barracks under Policy E3 must not impact on the housing allocation for the site under Policy GR3 or impact on the sustainable growth for Grantham and the need for a range of uses which the site can deliver.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	X	No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No	X	Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No	X	Unsure	
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Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

Homes England promotes high quality design and supports the inclusion of higher energy performance standards in new development. However, flexibility would need to be retained to
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ensure that higher energy performance requirements do not affect the viability and deliverability of schemes, resulting in underprovision of other contributions, including affordable housing.

#### 16. Proposal 12 – Need for Caravan Accommodation

##### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

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#### 17. Proposal 13 – Parking Standards

##### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No	X	Unsure	
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Please give details

Homes England promotes Building for a Healthy Life principles and encouraging active travel and movement by sustainable modes of transport. The redevelopment of Prince William of Gloucester Barracks seeks to create a sustainable community, benefitting from a range of local facilities and services, public transport provision in close proximity to Grantham and avoiding reliance on the private car. It is considered that parking standards should be developed flexibly on a case-by-case basis taking into account the needs of the development, area and local communities.

#### 18. Any other Comments

##### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Homes England and the DIO welcome the opportunity to comment on the SKDC Local Plan Review: Issues and Options Consultation. This response is provided in relation to the Prince William of Gloucester Barracks site (Housing Allocation GR3-H4). The site is surplus to military requirements and the Defence Infrastructure Organisation (DIO) made formal representations to support the allocation of the site through the Local Plan. The adopted Local Plan identifies the site to have a total estimated capacity of 3,500 - 4,000 units, with 1,775 units expected to be delivered in the

current Local Plan period to 2036. As the site is already allocated in the adopted Local Plan, Homes England and the DIO would expect this to be retained in the review but for completeness has also submitted a separate representation to the Call for Sites consultation. On the basis of the trajectory of 135 units/year set out in the SOCG between your Authority and the DIO (April 2019), the site could yield around an additional 675 homes within the currently proposed extended plan period, i.e. a total of 2,450 by 2041.

Homes England is a non-departmental public body, sponsored by the Ministry of Housing, Communities and Local Government (MHCLG), tasked with accelerating the delivery of housing across England. As the government's housing accelerator, Homes England has the responsibility to drive positive market change, of which a key aspect is to release more land to developers, helping to improve neighbourhoods and grow communities. Therefore, the Prince William of Gloucester Barracks site will be delivered at pace to boost the supply of homes and increase the anticipated yield of homes in the plan period.

Homes England's role is to ensure more people have access to better homes in the right locations, and to this effect, Homes England supports the sustainable housing growth ambitions and the work being undertaken by SKDC in its early review of the adopted Local Plan.

Homes England and the DIO have entered into a partnership to promote the redevelopment of the Prince William of Gloucester Barracks site for residential and associated uses, with Homes England leading on the delivery of the project.

Homes England has commissioned a professional services team to produce a masterplan and outline planning application for the site. This is a positive step and demonstrates the DIO and Homes England's commitment to early and continued delivery of the site through the existing and extended plan periods.

An outline planning application for the whole site is expected to be submitted to SKDC in late 2021, with early delivery to follow shortly after.

Homes England and the DIO support the Vision from the adopted Local Plan and agrees with the Council's proposal that this is broadly the same, but updated with respect to the plan period and greater level of housing growth. The development at Prince William of Gloucester Barracks will make a significant contribution to deliver the Council's vision, providing major housing growth to the south of Grantham and being integral to Grantham's role as the Sub-Regional Centre. Homes England and the DIO also agree that the objectives should remain the same for the new plan.

Homes England and the DIO support the settlement hierarchy which continues to identify Grantham as a focus for growth. However, it is considered that the 50-55% proportion of housing growth distributed to Grantham could be increased based on existing and planned infrastructure, and its ability as the Sub-Regional Centre to accommodate a higher level of sustainable growth than smaller settlements within South Kesteven. There are allocated sites, including Prince William of Gloucester Barracks, which will continue to deliver housing beyond the plan period. Increasing the proportion of housing growth in the Sub-Regional centre will allow flexibility to support a higher rate of housing delivery from allocated sites, which Homes England will seek to achieve. This may avoid the need to amend the Settlement Hierarchy to establish a new community on garden village principles or the need for significant housing delivery in smaller settlements where the infrastructure is not available to support sustainable growth.

Homes England and the DIO agree with the list of policies which are not proposed to be significantly changed. Of particular note is the retention of the Grantham Residential Allocations under Policy GR3, which includes allocation of the Prince William of Gloucester Barracks site (GR3-H4). The

retention of this policy is welcomed and the Homes England project team is working hard to deliver the aspirations for the strategic site in line with the allocation and supporting policy.

Homes England and the DIO support the early review work being undertaken by South Kesteven District Council and looks forward to working with the local authority to assist them in delivering their housing and employment growth aspirations as the Local Plan Review progresses towards adoption.

## **Part C: Sustainability Appraisal Scoping Report**

### **19. Comments about the Sustainability Appraisal Scoping Report**

Homes England and the DIO wish to comment on the Sustainability Appraisal Scoping Report in relation to the Options considered for **Biodiversity Net Gain**.

The Sustainability Appraisal considers two options for Biodiversity Net Gain as follows:

- Option NG1 – Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on major development sites.
- Option NG2 - Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.

Whilst Homes England and the DIO support the environmental benefits of Biodiversity Net Gain, a requirement for a minimum 20% measurable net gain from all major development sites may not be achievable. As outlined in the SA, it is noted that *‘the requirement to secure a minimum 20% net gain could be difficult to achieve on major development sites where the site is more ecologically sensitive, or where the loss of higher value habitats is unavoidable. This would be likely to significantly increase the demand for habitat banks and biodiversity setting, and may lead to disproportionate implications for the viability of particular development types’*.

The Environment Bill 2019-2021 introduces a requirement for 10% net gain. There is a risk that a 20% net gain requirement would impact on the viability and density of schemes, meaning less efficient use of allocated land and more sites would need to be identified to accommodate the Council’s housing growth.

Therefore, considering national policy requirements, Homes England and the DIO will work with the Council to deliver a solution that delivers environmental benefits, while also delivering new homes and community infrastructure.

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0039

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

### Part A: Personal Details

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	n/a
First Name	Anne	
Last Name	Dicks	
Organisation	East Northamptonshire Council	
Address	██████████ ██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
Email Address	██████████████████ ██████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

### 3. If you are not already on our consultation database and you respond your details will automatically be added to the database

<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

### 4. Please Sign and date this form

Signature (please type for an electronic response)	Date
██████████	20.11.2020

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

**Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?**

Yes		No	✓	Unsure	
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**If not please provide details.**

The recently adopted vision is sub-divided into spatial visions for each of the main urban centres and the rural areas. This is a useful approach, as it allows for the spatial development strategy to be easily linked to the relevant parts of the spatial strategy.

This recently adopted Vision (less than 12 months old) provides a good basis to review the recently adopted Local Plan

**Q1b – The Vision**

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?**

Yes		No	✓	Unsure	
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**If not please provide details.**

As said, the current Local Plan vision provides a good start point for a review. As regards climate change, this is implicitly referred to in the reference to: “Balancing the development needs of the District with the protection and enhancement of the natural and built environment”. However, there may be a case for the Plan Vision to explicitly recognise the increasing importance/ urgency of climate change over the next 20 years.

Regarding the current economic situation arising from Covid-19, it is recognised that this will continue to be a short term economic shock, at least for the next 18 months/ 2 years. In practice, any post-Covid economic recovery should be well advanced by the adoption date of the new Local Plan (2023, at the absolute earliest, even applying the Government’s new strict deadlines proposed in the Planning White Paper).

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

**Do you agree that the Objectives should remain the same for the new plan?**

Yes	✓	No		Unsure	
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**If not please provide details.**

It is noted that climate change is explicitly referred to at Objective 13. As stated above, this could also be explicitly referenced in the Plan Vision.

### 7. Proposal 3 – Policies not proposed to be changed significantly

#### Q3 – Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No		Unsure	✓
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If not please provide details.

It is less than 12 months since the current Local Plan was adopted. In this respect, the Plan must be regarded as up to date as it could be. Of course, there may be arguments to tweak individual policies (especially employment/ economic development policies) to reflect any potential longer term economic realignment that has arisen from the Covid-19 outbreak. Once again, however, it is emphasised that the current Covid-19 outbreak should be largely seen as a short term economic shock, with only limited implications over the lifetime of a Local Plan (15-20 years).

### 8. Proposal 4 – Plan Period

#### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes		No		Unsure	✓
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If not please provide details

2041 is a logical end date for the new Local Plan (i.e. 20 years from now). However, given that the current Plan runs to 2036 in any event there could be an argument to extend the period, say for a further 5 years (i.e. 2046) to make the review more meaningful/ worthwhile.

### 9. Proposal 5 – Settlement Hierarchy

#### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	✓	Unsure	
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If not, please provide details of what changes you think should be made.

The adopted settlement hierarchy appears to be logical and straightforward. The use of a two tier rural settlement hierarchy (totalling four settlement tiers – Grantham Sub-Regional Centre; Market Towns; Larger Villages; Smaller Villages) is straightforward and appropriate.

The larger villages are clearly defined and of differing character to the majority of villages. It is noted that this hierarchy has recently been adopted and is based up on up to date evidence. However, a reference to the Methodology paper reveals that a large number of villages are designated “countryside”, outside the hierarchy (formerly restraint villages). Arguably this could fly in the face of Localism, whereby communities can put forward locally led development proposals by way of a Neighbourhood Plan. The strategic policy designation of these as open

countryside could effectively preclude Neighbourhood Planning in these smaller rural localities, even where there is local need and/ or support.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	✓	No		Unsure	
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**If not, please provide details of what changes you think should be made.**

The Methodology paper provides a logical, quantitative and systematic review of settlements. This approach would allow for any challenge to the status of individual villages within the hierarchy to be defended.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	✓	Unsure	
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**If so, please outline any suitable and deliverable proposals.**

The Local Plan should focus upon the delivery of the proposed Spitalgate Garden Village, to the south east of Grantham. It is not considered that there is any need to designate further new settlements at this stage.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	✓	No		Unsure	
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**If not, what evidence do you have to justify an alternative need and requirement?**

Provided the figure is based upon a robust and defensible evidence base for housing need.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	✓	No		Unsure	
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**If not, please provide details and any alternative proposals.**

Delivery of Spitalgate Garden Village and associated infrastructure to the south east of Grantham, should be regarded as the priority for South Kesteven.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

East Northamptonshire Council is particularly interested in the quantum of growth proposed at Stamford, due to the role of this town as a main service centre for several villages to the north of the District; e.g. Duddington, Collyweston, Easton on the Hill, Fineshade, King’s Cliffe, Wakerley.

Stamford is constrained by the River Welland and heritage assets such as Burghley House, but its strategic location on the A1 corridor must be noted. It is recognised that the north of the town has the fewest development constraints.

Bourne and The Deepings are situated along the A15 corridor. These towns have a great deal in common and may be able to accommodate a level of growth appropriate to their status as Market Towns. By contrast, Stamford may have scope to accommodate further strategic growth, given its situation along the strategic A1 (Great North Road) Trunk Road corridor.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

Larger Villages have a range of services and facilities, such that these may be suitable to accommodate modest and appropriate additional development. Nevertheless, it may be appropriate to set modest indicative housing requirements for each, in order to allow Neighbourhood Plans to come forward to deliver these.

Dependent upon the overall proposed quantum of development for rural areas, there may be a need to allocate further housing land through the Local Plan review.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	✓
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If not, please provide details and any alternative proposals.

See response to Q5a with regard to Neighbourhood Plans.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please provide details

These measures should feature significantly in the strategic housing market assessment, together with development constraints (at a sub-district/ settlement specific level).

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

### 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

#### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If yes, please provide details.

Not aware of any specific needs but agree it is appropriate to accommodate identified needs within any existing Local Plan allocations.

There are a number of travelling families based around the Grantham area, but we are unaware of any specific needs in/ around Stamford within implications for East Northamptonshire (i.e. to the south of the district).

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**If not, please provide details.**

This would be a robust approach to setting appropriate allocations.

#### **14. Proposal 10 – Climate Change**

##### **Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

This proposal appears to be future-proofed and can address the latest Government strategies (in line with recent announcements).

#### **15. Proposal 11 – Energy Performance Standards**

##### **Q11a Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
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##### **Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

<b>Yes</b>	<input type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input checked="" type="checkbox"/>
------------	--------------------------	-----------	--------------------------	---------------	-------------------------------------

**Please give details.**

Setting energy performance standards is always problematic, given that these are negotiable through the development management process on the basis of development viability. That said, if higher standards could be supported by a robust evidence base then it may be appropriate to include these within the reviewed Local Plan.

##### **Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

**Please give details**

No awareness of relevant evidence. If higher standards are sought it will be necessary to support these by way of a robust study and analysis.

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	✓
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**Please give details**

No awareness of relevant demand. If specific targets are sought it will be necessary to support these by way of a robust study and analysis of need and demand.

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	✓
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**Please give details**

No specific comments. Parking standards are considered to be a local/ non-strategic matter and would not have implications beyond the district.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

From an East Northamptonshire Council perspective, future growth proposals for Stamford are most likely to have implications for this District. We note that the Stamford North Extension (SNE) is already a significant commitment and may have implications for the District in terms of implications for the A1/ A43 corridor.

Further strategic urban extensions in/ around Stamford may also have further implications for East Northamptonshire, so this Council and the replacement North Northamptonshire unitary authority will need to continue to engage with South Kesteven DC as any potential future

strategic sites come forward.

Otherwise, we may need to engage with South Kesteven DC in delivering green infrastructure enhancements for the Welland Valley. It may be necessary for the new North Northamptonshire unitary authority to work more closely with South Kesteven in delivering green infrastructure projects for the Welland Valley.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0040

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Mr	Miss
<b>First Name</b>	Tom	Charlotte
<b>Last Name</b>	Hindmarch	Bailey
<b>Organisation</b>	Stamford Property Company Ltd	DLP Planning Ltd
<b>Address</b>	██████████	██████████ ██████████ ██████████████████ ██████████
<b>Postcode</b>	██████████	██████████
<b>Telephone</b>	██████████	██████████
<b>Email Address</b>	██████████	████████████████████████████████████████

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3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████████████████████████████████████	20/11/2020

## Part B: Issue and Options Consultation Questions

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	✓	No		Unsure	
If not please provide details.					
We agree that the Vision will require updating to reflect the revised assessment of housing need as well as the change to the plan period once these are confirmed.					
We support the Local Plan's Vision for Stamford, which endorses the local economy. The local economy will be supported through the supply of land to develop a diverse, range of employment opportunities in Stamford and to capitalise on its location close to the A1 with links to Peterborough and Cambridge. Growth in Stamford should be supported to enable all sections of the community to enjoy a sustainable way of life.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	✓	No		Unsure	
If not please provide details.					
No specific comment to make.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	✓	No		Unsure	
If not please provide details.					
No specific comments to make.					

7. Proposal 3 – Policies not proposed to be changed significantly					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	✓	Unsure	
If not please provide details.					
We do not agree with the list of Local Plan policies, which are not proposed to be changed. A number of policies in the plan require updating to ensure that they are consistent with national policy or to enhance their effectiveness. We recommend that the Council consider updating the following policies:					
- H4 (Meeting All Housing Need).					

The National Planning Policy Framework seeks to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive, and mixed communities. Whilst Policy H4 reflects this aspiration, stating that new housing proposals shall increase choice in the housing market in rural and urban areas, it is a very all-embracing policy which does not recognise the specific characteristics of the housing market and sectors of housing demand. In this regard, there is a considerable difference in the nature of the communities that make up Bourne, Stamford and The Deepings, and that is to their strength and should be acknowledged by the Plan.

In the case of Stamford high levels of accessibility and environmental quality in the central urban area make the town a significant attraction for migrants, especially from those who can afford a 'lifestyle' choice of location based on the potential for commuting. There is however the scope to capture this attraction as a means of boosting the local economy through opportunities that the attraction of the town creates to generate business investment and by the supply of housing suitable for senior executives who are likely to be drivers of the local economy.

Specifically we consider that there is an unmet need for the planned delivery of very high quality bespoke houses on an appropriate site which should be allocated for the purpose and that such a proposal would be best located at or adjoining Stamford in South Kesteven. As such, it would form a complement to the form and type of housing that largely characterises the hamlet of Wothorpe. This can be distinguished from the type of housing that is normally the result of development that arises from allocated sites. These are normally relatively high density developments that are expected to deliver a range of house types including affordable homes which, whilst producing a small number of comparatively larger house types, do not meet the type of market demand to which a bespoke scheme would be addressed. Such housing is therefore usually the preserve of windfall infill sites which demonstrates the demand, but which cannot meet demand in isolation.

We consider that specific policy action is required, and such a demand should be recognised in the 'Meeting Housing Needs' section of the Plan. Furthermore, the land at Newstead Farm provides the opportunity for the Council to allocate a site for this specific need.

## 8. Proposal 4 – Plan Period

### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

We agree that the proposed plan period should be extended up to 2041. Using 2036 as an end date for the plan would result in the plan review not looking forward to a minimum 15 years into the future from when it is anticipated to be adopted (as required in the National Planning Policy Framework) based on a likely adoption of the review by the end of 2024.

## 9. Proposal 5 – Settlement Hierarchy

### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

**If not, please provide details of what changes you think should be made.**

We support an approach where the majority of development will be focused on the established urban centres including Stamford, which prioritises development of sustainable sites within the built-up part of the town and appropriate edge of settlement extensions.

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	✓
------------	--	-----------	--	---------------	---

**If not, please provide details of what changes you think should be made.**

No specific comment to make.

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	✓
------------	--	-----------	--	---------------	---

**If so, please outline any suitable and deliverable proposals.**

No specific comment to make.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?**

<b>Yes</b>		<b>No</b>	✓	<b>Unsure</b>	
------------	--	-----------	---	---------------	--

**If not, what evidence do you have to justify an alternative need and requirement?**

We object to the use of 745 dwellings per annum as the identified housing need and requirement for South Kesteven. As part of the Government’s reforms they have proposed a new ‘standard methodology’ for assessing the baseline housing need.

Currently, the Local Plan delivers 650 dwellings per annum and the current standard methodology figure is 754 dwellings (using the 2014-based household projections and the latest affordability ratios (2018)), to which the Issues and Options Report addresses itself.

Whilst the standard methodology approach is yet to be finalised by Government it will lead to the need for specific policy action and it is our view that this is likely to amount to a level of housing significantly higher than that allowed for in the current Local Plan.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

<b>Yes</b>	✓	<b>No</b>		<b>Unsure</b>	
------------	---	-----------	--	---------------	--

**If not, please provide details and any alternative proposals.**

No specific comment to make.

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>	✓	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

Priority should be given to the delivery of sustainable sites within the built-up part of the town and appropriate edge of settlement extensions, which includes brownfield land.

We note that the proposed strategy for Stamford is to focus on growth to the north of the town (allocation ref: STM1: H1). The Local Plan states that this accords with the findings of the Stamford Capacity and Limits to Growth Study as focusing growth in the north will ensure the historically significant and sensitive landscape to the south of the town is protected whilst the fabric of the town is protected for future generations.

The Plan states that the proposed northern allocation will provide a comprehensive extension to the town, however this will happen over a number of years and therefore it will be some time before housing completions are achieved. As such the Council allocated additional land at Stamford East (STM1:H2). In this regard it is noted that allocation STM1:H1 is anticipated to deliver 1,300 dwellings, whilst STM1:H2 is anticipated to deliver just 162 dwellings. Notably the policy explicitly requires a comprehensive masterplan for STM1: H1 and a single planning application to be submitted for the entire site.

The Company does not object to the allocation of STM1:H1. Indeed, it considers it essential to allow for the long-term growth and prosperity of Stamford. Notwithstanding this support in principle, the Company does express its concerns that the Council risks relying too heavily upon two allocations to deliver the majority of housing in Stamford.

It is widely accepted that housing delivery can be slow on large strategic sites, as substantial infrastructure works are required ahead of dwellings being constructed and delivered. The dominance of a strategic site will therefore risk the future delivery of housing in South Kesteven and so place at risk the vision and objectives of the Local Plan.

To maximise housing supply, the widest possible range of sites, by size and market location are required in order that housebuilders of all types and sizes have access to suitable land in order to offer the widest range of products. Accordingly, we consider it necessary for the Council to provide a variety of size and type of additional sites to provide choice to the market, headroom for delivery and increase housing supply in the short term to boost delivery rates in Stamford. This will subsequently boost the economic growth aspirations of Stamford.

This approach is in accordance with the Planning for the Future White Paper that requires policies in plans to allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector. The White Paper highlights that small-medium scale sites create particular opportunities for custom builders and small developers.

In that context, the Company has misgivings, as set out above, regarding the allocation of STM1: H2

insofar as this is an existing employment site and its redevelopment for housing would be at odds with the overall economic strategy of the Plan and diminish the supply of valuable employment opportunities in a location where there is established demand for new employment development. This is notwithstanding the acknowledged need as stated above, for a range of smaller supplementary sites to be allocated which can help ensure short to medium term supply and ensure that, overall, the requirement for housing in Stamford can be addressed. It is still considered that additional small and medium sized sites should be allocated to provide a sufficient range of different housing opportunities as well as to allow for the specific mix of housing in the market which the Company considered should be provided.

The site at Newstead Farm has previously been discounted, seemingly solely because it is not in accordance with the findings of the Stamford Capacity and Limits to Growth Study.

However, the Stamford Capacity and Limits to Growth Study is a strategic study which assesses large scale sites. The Study itself highlights that land deemed by the study not suitable for development on a large scale may retain the potential to be suitable for smaller scale development. It is our assertion that a medium scale development at Newstead Farm would be suitable for development and would not be at odds with the findings of the study.

As such we consider that the land at Newstead Farm should be allocated for residential development.

#### Q7c – Larger Villages

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there is a range of available services and facilities?**

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

**If not, please provide details and any alternative proposals.**

No specific comment to make.

#### Q7d – Other Settlements

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes		No		Unsure	✓
-----	--	----	--	--------	---

**If not, please provide details and any alternative proposals.**

No specific comment to make.

#### Q7e – Consideration of the Market and Deliverability\*

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes		No		Unsure	✓
-----	--	----	--	--------	---

**Please provide details**

No specific comment to make.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic”).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	✓
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If yes, please provide details.

No specific comment to make.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
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If not, please provide details.

There is an urgent need to update the 2015 ELS and also to review the current allocations insofar as it is necessary to ensure that their flexibility for use is not compromised by surrounding uses – for example leading to the imposition of hours of operation restrictions which can severely restrict their utility, or on the other hand do not conflict with residential amenity in surrounding areas.

The Council should thoroughly re-evaluate its existing allocated employment stock and determine how it should proceed into the future to reflect market needs and working practices whilst seeking to minimise journey to work distances and making employment sites genuinely accessible.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	✓
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If not, please provide details.

No specific comment to make.

**14. Proposal 10 – Climate Change****Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	✓
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

No specific comment to make.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	✓
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#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	✓
-----	--	----	--	--------	---

Please give details.

No specific comment to make.

#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

No specific comment to make.

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	✓
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Please give details

No specific comment to make.

### 17. Proposal 13 – Parking Standards

#### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	✓
-----	--	----	--	--------	---

Please give details

No specific comment to make.

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

No specific comment to make.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

No specific comment to make.

**Thank you for responding to this consultation.**

**Amy Bonfield**

---

**From:** Guy Hird [REDACTED]  
**Sent:** 20 November 2020 15:45  
**To:** PLANNING POLICY  
**Subject:** FW: South Kesteven District Council Local Plan Review - Issues and Options Report - Public Consultation

**Categories:** Yellow Category

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UD-5350-2020-PLN  
UD-1901-2015-PLN

Dear Sir/Madam

[South Kesteven Local Plan Review – Issues and Options Report - Public Consultation](#)

Thank you for the opportunity to comment on Local Plan Review. The South Kesteven District Council area includes some the Upper Witham Internal Drainage Board some of the Upper Witham Internal Drainage Board extended area (catchment to the area) and some of Witham Internal First District Drainage Board extended area (catchment to the area).

The Boards have no comment on the submitted documents for this stage, but look forward to commenting when appropriate through the process.

The Boards will continue to comment of individual planning Applications as they are submitted.

Regards

Guy Hird  
Engineering Services Officer

**Our office is closed to visitors but our staff are still working. Please email or telephone with all enquiries.**

[REDACTED]

Witham First District Internal Drainage Board  
Witham Third District Internal Drainage Board  
Upper Witham Internal Drainage Board  
North East Lindsey Drainage Board

[REDACTED]

Four independent statutory Land Drainage and Flood Risk Management Authorities working in partnership.



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**From:** PLANNING POLICY <PLANNINGPOLICY@southkesteven.gov.uk>  
**Sent:** 08 October 2020 11:28 AM  
**To:** PLANNING POLICY <PLANNINGPOLICY@southkesteven.gov.uk>  
**Subject:** South Kesteven District Council Local Plan Review - Issues and Options Report - Public Consultation



Dear Sir or Madam, Date: Thursday 8th October 2020

**PLANNING POLICY CONSULTATIONS**  
**South Kesteven Local Plan Review – Issues and Options Report - Public Consultation**

South Kesteven District Council is undertaking its first public consultation on the review of the Local Plan between **Monday 12<sup>th</sup> October 2020 and Monday 23<sup>rd</sup> November 2020.**

The current Local Plan for South Kesteven was adopted in January 2020 and sets out the development strategy for growth of the District to 2036. The Inspector’s final report on the current [Local Plan \(2011-2036\)](#) commits the Council to undertake an early review of the Local Plan from April 2020 with submission by the end of December 2023. The Council has begun the process of preparing a new Local Plan for the District, which will set out the planning framework for the District over the next 20 years up to 2041. The review enables necessary updates of evidence, and the Council to consider whether its local housing need has changed and needs to be re-evaluated taking into consideration changes to national planning guidance.

The timetable for the review of the Local Plan is anticipated to be examined from January 2024 and adopted in January 2025, until the review has been undertaken and a new Local Plan is found sound and adopted by the Council, the current Local Plan (2011-2036) will continue to be the development plan for the District and used in determining planning applications.

The Issues and Options consultation is the first opportunity for the local community to become involved in the preparation of the Local Plan Review, which sets out the scope of the key policies and proposals to be considered

within the review. Reviewing the plan now can help ensure that it remains up to date and that South Kesteven will continue to grow sustainably, meeting the needs of its residents and businesses whilst protecting what is special about the area. At this stage, the Issues and Options consultation is not a statement of the Council's proposed planning policies but a statement of intention as to what planning policies may need to be reviewed and updated. The Issues and Options paper asks a series of questions which will help the Council determine the scope and content of the Local Plan review.

As part of the Local Plan Review, the Council has also prepared a Sustainability Appraisal Scoping Report which is published for comment alongside the consultation paper.

Consultation responses should focus on the questions asked in the consultation paper using the response form available on the Council's website.

Please return completed forms by **11.59pm Monday 23<sup>rd</sup> November 2020** to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit spread of the infection. The return of forms via email is therefore preferred.

The documents, along with further details of the consultation will be available for inspection from Monday 12<sup>th</sup> October on the Council website;  
<http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

**Hardcopies are not currently available at the Districts Council Offices and local libraries due to Covid-19 and will only be available for inspection online at the Council's website.** This is in line with the guidance on reviewing and updating the Council's Statement of Community Involvement (SCI), and new legislation which has now come into force for local development documents (amending, on a temporary basis, regulations 35 and 36 of the Town and Country Planning (Local Planning) (England) Regulations 2012) until 31<sup>st</sup> December 2020. However, if you do require a paper copy of the Consultation paper or response form please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

Please note copies of all comments will be made available for the public to view, including the name of the stakeholder who submitted the representation therefore, your response cannot be treated as confidential. However, the Council will not include any personal addresses or signatures.

**If you wish to comment on the consultation paper, please ensure that your comments are received by the Council by 11.59pm Monday 23<sup>rd</sup> November 2020 otherwise your response may not be considered.**

Please also note, an ongoing Call for Sites process is running alongside this consultation, if you have not been contacted directly further information can be found on the Council's website.

<http://www.southkesteven.gov.uk/index.aspx?articleid=15135>

Yours sincerely,

*Roger Ranson*

Roger Ranson – Head of Planning Policy



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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	Sarah	
Last Name	Legge	
Organisation	Melton Borough Council	
Address	<p>██████████</p> <p>██████████████████</p> <p>██████████████</p> <p>██████████████████</p> <p>██████████████</p>	
Postcode	██████████	
Telephone	██████████	
Email Address	██████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	20 <sup>th</sup> November 2020

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No		Unsure	X
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If not please provide details.

The period since the plan was adopted has seen vast changes in the economy, and we are concerned that by making such minimal changes to the vision fails to acknowledge the very different economic position that we now find ourselves in.

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	X
-----	--	----	--	--------	---

If not please provide details.

The Vision sets out to ensure communities enjoy a sustainable way of life in all of the areas within the District, and recognises the importance of protecting and enhancing the natural and built environment. However, it does not have a vision of directly addressing climate change and encouraging positive change in this respect only addressing and mitigating any negative effects of development. We are therefore unsure as to how the vision will deal with climate change. The Vision would also benefit from including and recognising economic recovery will be required in the post-Covid world.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes	X	No		Unsure	
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If not please provide details.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not please provide details.

--

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	X	No		Unsure	
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes	X	No		Unsure	
If not, please provide details of what changes you think should be made.					
No reason to think that this Settlement Hierarchy is outdated.					
<b>Q5b – Settlement Hierarchy Methodology</b>					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes	X	No		Unsure	
If not, please provide details of what changes you think should be made.					
The current methodology seems appropriate.					
<b>Q5c – New Settlement</b>					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes		No	X	Unsure	
If so, please outline any suitable and deliverable proposals.					
According to the supporting text the Council does not seem to have identified a deliverable/developable option in this category; consequently there is no need to include it as it will not be part of the overall strategy.					

**10. Proposal 6 – Housing Need and Requirement****Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

Although the Standard Method sets the minimum housing need, the historic delivery rates in the district seem to indicate that adopting a higher requirement would be unrealistic.

**11. Proposal 7 – Distribution of Growth****Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

It seems to be a reasonable sustainable approach.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

It seems to be a reasonable sustainable approach.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

It seems to be a reasonable sustainable approach.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

Windfall sites will proportionate an adequate level of growth in these smaller settlements.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
<b>Please provide details</b>					
<b>No reason to ignore this evidence. Consideration of these elements would bring a more robust evidence base to support the overall distribution.</b>					

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

<b>12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation</b>					
<b>Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation</b>					
<b>Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?</b>					
Yes		No		Unsure	X
<b>If yes, please provide details.</b>					
<b>It is appropriate to accommodate identified needs within the existing Local Plan allocations if appropriate.</b>					

<b>13. Proposal 9 – Revisions to the Employment Policy</b>					
<b>Q9a – Strategic Employment Allocations</b>					
<b>Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?</b>					
Yes	X	No		Unsure	
<b>If not, please provide details.</b>					
<b>Updating the study will be vital to understanding the new needs of the area.</b>					
<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
<b>Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?</b>					
Yes	X	No		Unsure	
<b>If not, please provide details.</b>					
<b>Due to the COVID crisis, the results of the study may lead the Council to add flexibility to the specific uses needed within the area. This will be something that all Councils will need to consider in the future to support their economic growth effectively.</b>					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
<b>Are the existing policies in the adopted Local Plan sufficient to meet current and future</b>					

**challenge of climate change?**

Yes		No		Unsure	X
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**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

A review of current national and local targets will be needed to ensure the policy enables these targets to be met particularly as the council declared a Climate Change Emergency. It will also be important for the Council to reflect on new sustainable building technologies that may be in place by the time the review is underway. As stated the future homes standard will be an important part of this review. Other standards and regulations may also be in place that could lead to key parts of the policy needed to be changed i.e. energy consumption and water resources.

However, the policy as it stands is comprehensive, but it may require updating to be in line with the most up-to-date regulations and standards. Whilst the Plan should ideally aspire for development to be built to standards above the minimums required by Building Regulations, those policies would in our experience not pass examination and would be widely challenged by developers.

To summarise the policy does meet the current challenges of climate, however will mostly probably need to be updated to meet the future challenges.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

Yes		No	x	Unsure	
-----	--	----	---	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

Yes		No	x	Unsure	
-----	--	----	---	--------	--

**Please give details.**

It is clear that the Government’s preference is for energy efficiency standards to be driven by Building Regulations and the Future Homes standard for housing in particular. This will result in higher than level 4 standard becoming minimum building regulation standards, most likely the first uplift will come into force before your local plan could come into effect.

The Government’s view is that the local authority energy efficiency powers create inconsistency, confusion and inefficiencies (because standards vary) and it proposes to remove local authority powers to set out higher energy efficiency requirements in development plans (by enacting Section 43 of the Deregulation Act (2015)), it is our view that this is likely to come into effect before the adoption of your plan.

A series of additional consultations are also expected in relation to non residential developments and how they can meet increasing standards via building regulations approach over the next 5 years.

A more effective approach would be to promote and support higher energy efficiency standards, consideration could be given to mechanisms and incentives to support the provision of homes that surpass building regulation standards. Consideration could also be given to policy outside the energy efficiency regulations, for example, to require developers to set out how the orientation, layout and design of buildings has been considered so to achieve effective solar heating in winter and avoid overheating in summer.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

Future homes consultation provides some indication of costs to achieve planned uplift in standards that is expected by the end of the year which will exceed level 4 standards

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	X	Unsure	
-----	--	----	---	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	x	No		Unsure	
-----	---	----	--	--------	--

Please give details

Fully agree that minimum parking standards are required to limit the amount of on street parking with regards to new developments. Parking provision is one of the main concerns for

homeowners and anyone using or living nearby new developments. A lack of, or inappropriate, parking can cause wider issues. Having a parking standard in place will provide clarity for developers and potentially alleviate some of the current parking issues.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

None.

--

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0043

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Ms	
First Name	Julia	
Last Name	Miller	
Organisation		
Address	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 70px; height: 15px;"></div>	
Postcode	<div style="background-color: black; width: 60px; height: 15px;"></div>	
Telephone	<div style="background-color: black; width: 100px; height: 15px;"></div>	
Email Address	<div style="background-color: black; width: 200px; height: 15px;"></div>	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 80px; height: 15px;"></div>	20.11.20

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	YES	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	NO	Unsure	
If not please provide details.					
See later specific questions					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No</b>	<b>NO</b>	<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

See below

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>	<b>NO</b>	<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

There should be a more proactive assessment of some of the smaller villages, e.g. Allington, which could easily take more houses and would benefit from additional retail facilities. Using a rigid Hierarchy as proposed is in danger of overloading the larger villages with inappropriate development whilst not using land available in smaller villages such as Allington which could easily cope with over 10% growth and has not had recent developments.

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>UNSURE</b>
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**If so, please outline any suitable and deliverable proposals.**

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No	NO	Unsure	
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If not, please provide details and any alternative proposals.

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There seems to be a misunderstanding of the services and facilities in our Larger Village – where road traffic is increasing exponentially as a cut-through – encouraged by your proposals to site a retail outlet to ‘capture through traffic’ where every entry point to the village is narrow and full of parked cars. The current proposals for Barrowby do NOT meet the current housing standards or the match the current housing type, which is primarily four bedroom houses with gardens garages and off-road parking. Barrowby is being used as a means of SKDC achieving affordable housing, whilst pretending that this is a local need for the village which it is not. The proposed housing is of cheap and nasty quality with a minimum nod to climate change and environmental standards and no account being taken at all of the vistas and views and current preferences for the local residents. Barrowby has taken a large proportion of the housing needs in the current plan for the Larger Villages. I expect this to be more equitably shared in future.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	NO	Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

All new developments should be designed for increased walking, with easy access to countryside and with safe cycle paths. Houses should be more than water-neutral. Grey water usage should be built into all developments and water savings should be positive.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

<b>Yes</b>	<b>YES</b>	<b>No</b>		<b>Unsure</b>	
------------	------------	-----------	--	---------------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

<b>Yes</b>	<b>YES</b>	<b>No</b>		<b>Unsure</b>	
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**Please give details.**

--

**Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

**Please give details**

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

**Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**Please give details**

--

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

Yes

YES

No

Unsure

**Please give details**

In conjunction with LCC there should be much more consideration of safety concerns from residents and an increased desire to place double yellow lines where there is potentially dangerous corners, less than adequate visibility and significant on street parking at particular times of day, e.g. by school runs, dog walkers etc. There should be checking of car engines left running. Any retail outlets planned as part of developments should have sufficient car parking for all expected visitors and it should be mandatory to use the car park to avoid on road parking.

#### **18. Any other Comments**

##### **Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

I have no confidence that this is worth while in any sense except as an opportunity for land owners to make huge profits. The concerns of the communities affected seem to be ignored and the attitude of SKDC officials towards residents is patronising and contemptuous. The fact that this is being carried out when people are back in lockdown with many other things to worry about seems to bear this out.

#### **Part C: Sustainability Appraisal Scoping Report**

##### **19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0044

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

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**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

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**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	Sarah	
Last Name	Roberts	
Organisation		
Address	██████████ ██████	
Postcode	██████	
Telephone	██████████	
Email Address	████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	20/11/20

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
Vision seems to rely heavily on roads (eg A1) not improving public transport/cycleways – apart from in Grantham.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
Objective 9 should include reference to the Town’s Neighbourhood Plans being core in any decisions made.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

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<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	✓	No		Unsure	
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes	✓	No		Unsure	
If not, please provide details of what changes you think should be made.					

<b>Q5b – Settlement Hierarchy Methodology</b>					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes	✓	No		Unsure	
If not, please provide details of what changes you think should be made.					

<b>Q5c – New Settlement</b>					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes		No	✓	Unsure	
If so, please outline any suitable and deliverable proposals.					

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	✓
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

If the towns are expected to grow by another 8-10% then growth of infrastructure will need to grow by the same amount – capacity for schools, doctors, dentists, travel, leisure facilities.
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details and any alternative proposals.

--

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

Please provide details

I believe builders will build where they can – not where is best for the residents of the towns – areas for building should be identified by the locals and local town councils – not by a developer whose pure aim is to sell for maximum profit.

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

This is a fast moving and ever changing policy – the Plan will need to allow for changes to policies to be included in the plan so all development is to the required standard – at the point of building when it is cheaper to implement.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Please give details.**

Current standards should always be used – and if possible any up-coming standards should be incorporated.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

**Please give details**

I would suspect that installing Higher Energy performance standards at the time of building is much cheaper than adding them later – and it ensures they happen – if it is law it should be done as a matter of course, if it is suggested then developers should be able to have a green accreditation for doing above what is required.

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

**Please give details**

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

**Please give details**

All new housing development should provide for adequate parking – at least two cars per household – even a one bedroom flat could have two occupants with the need for two cars.

Larger houses may have more requirement for parking. When electric vehicles are the only car then drives will be required for people to charge their cars cheaply and easily. Roads should be wide enough for cars to be parked without causing obstructions.

#### 18. Any other Comments

##### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Will the council be including 'council housing' in the allocated housing? Not affordable housing – but good quality houses owned by the council and rented out to locals who cannot afford other types of housing.

#### Part C: Sustainability Appraisal Scoping Report

#### 19. Comments about the Sustainability Appraisal Scoping Report

I am very disappointed that no mention of Bourne Woods is made in the report. It may not have SSSI status – but is a green space capturing carbon, providing leisure and relaxation space for the local community and should be included in any such report as a very important part of the local landscape.

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0045

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

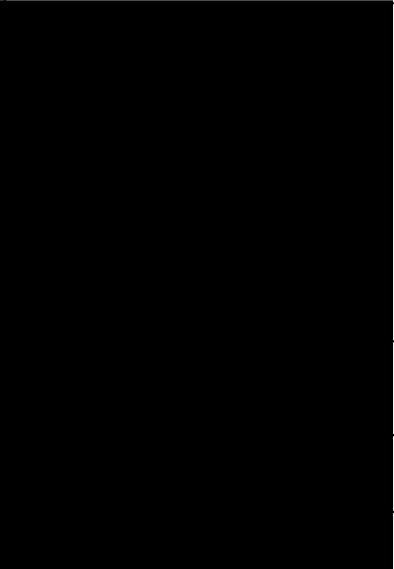
**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		
First Name	David	
Last Name	Grove	
Organisation		
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	20/11/20220

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

7. Proposal 3 – Policies not proposed to be changed significantly					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

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**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

--------------

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	--------------------------

If so, please outline any suitable and deliverable proposals.

----------------------

**10. Proposal 6 – Housing Need and Requirement****Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

--

**11. Proposal 7 – Distribution of Growth****Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

Stamford is a special case. The conservation area has national importance. There is no scope for increasing car parking in the town centre. There is no possibility of a bypass or a second river crossing. Further growth will inevitably put unacceptable pressure on existing roads and car parking, and thus endanger the continued protection of Stamford's unique assets. It will undermine the very qualities that make the town such an attractive place to live in. This consideration should override any market appraisal that shows volume builders wish to continue developing large new estates on the edge of Stamford.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

--

Larger villages which rely on Stamford as a shopping and service centre should have no more housing than is needed to meet local natural increase (if any) because the traffic they generate also threatens to undermine the unique nature of Stamford.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details.</b>					
<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
<b>Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details.</b>					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
<b>Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.</b>					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
<b>Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
<b>Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

**Amy Bonfield**

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**From:** David and Ayla [REDACTED]  
**Sent:** 20 November 2020 20:45  
**To:** PLANNING POLICY  
**Subject:** Local Plan review  
**Attachments:** I\_O\_Response\_Form\_v41 (1).docx

**Categories:** Yellow Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Sir/Madam,

Please find attached a response to the review document. I have a number of concerns: -

- . An increase in housing numbers above and beyond the already huge developments taking place in all the major towns and larger villages at present and allocated in the Local Plan to 2036.
- . A total lack of improvements in infrastructure to meet the increasing demands from these developments: For Bourne we know that the A15 is under immense pressure, particularly at school times and when the A1 is closed for any reason. It carries through traffic and school traffic from the villages to the north, Morton and Rippingale, which have expanding populations.
- . Medical facilities have increased capacity to cope with the added population from Elsea Park, but not for large additions beyond that.
- . schools in Bourne have increased in size but are under pressure now. There will need to be a new junior school and even more classrooms at the Bourne Academy.
- . Your vision for Bourne declares that SKDC will develop its “distinct market town role”; the town centre is grid locked with traffic, lorries turn into Abbey Road from North Street, often mounting the pavement to negotiate the turn; unless the town has a relief road to accommodate traffic for the industrial area, thereby removing it from the town centre, Bourne will continue to maintain its trajectory as a satellite town for Peterborough, with little to remind people that this was once a town with a thriving market and services. To compound this, the review suggests that there is an over-allocation of employment land, begging the question as to where the increased population is going to work that doesn't require people to travel by car.

May I suggest that our MP is brought in to question the “sustainability” of all this proposed new development in South Lincolnshire. The Government appears to be altering its views on the subject and should be reminded that this area is already under tremendous pressure.

The Local Development Framework Core Strategy, adopted on 5<sup>th</sup> July, 2010 states: “There is a predicted deficit of water in the Bourne Planning Zone”. I can only presume that this statement still holds true, and will only be compounded by the continued increase in population. It should also be realised that all this development will have to take place on agricultural land.

Ayla Smith

Sent from [Mail](#) for Windows 10



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**This form has three parts**

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**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

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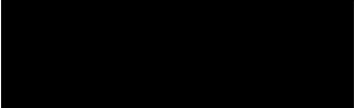
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If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

### **Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Mrs	
<b>First Name</b>	Ayla	
<b>Last Name</b>	Smith	
<b>Organisation</b>		
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone</b>		
<b>Email Address</b>		

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

### **4. Please Sign and date this form**

<b>Signature (please type for an electronic response)</b>	<b>Date</b>
	20/11/2020

### **Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>				
<b>Q1a – The Vision</b>				
<b>Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?</b>				
<b>Yes</b>		<b>No</b>	<b>/</b>	<b>Unsure</b>
<b>If not please provide details.</b>				
<b>"sustainable" needs to be defined</b>				
<b>What does "high quality growth" actually mean?</b>				

**Q1b – The Vision**

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?**

Yes		No	/	Unsure	
-----	--	----	---	--------	--

**If not please provide details.**

**There should be more emphasis on the use of renewables - all new housing and industrial units should be required to incorporate solar panels in roofs. Houses should be energy neutral.**

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

**Do you agree that the Objectives should remain the same for the new plan?**

Yes		No	/	Unsure	
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**If not please provide details.**

**Need to strengthen protection of all local green spaces with buffer zones, to be used for tree planting and other landscaping to mitigate impacts of climate change.**

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not please provide details.**

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not please provide details**

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No/</b>	<b>/</b>	<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

In view of the vast amount of development already happening in all the towns, and larger villages, which is destroying the tenets of your Vision Statement, SKDC should make strong representations to the Government to reduce the burden of more development. This area of South Lincs is rapidly developing into an outskirt for Peterborough, without adequate roads and other infrastructure.

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>	<b>/</b>	<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

See 5a

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If so, please outline any suitable and deliverable proposals.**

--

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?**

Yes		No/	/	Unsure	
-----	--	-----	---	--------	--

**If not, what evidence do you have to justify an alternative need and requirement?**

The huge impact of present developments is reducing the quality of life for residents and taking large chunks of agricultural land out of production.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not, please provide details and any alternative proposals.**

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

Yes		No/	/	Unsure	
-----	--	-----	---	--------	--

**If not, please provide details and any alternative proposals.**

The facilities in these towns are plainly overstretched now - in Bourne, the A15 can't cope with the traffic, the schools are full, the medical practices can cope with Elsea Park requirements but no more. The developments already outlined for the 3 towns, without the extra proposed in this document, will have/are having huge impacts and really shouldn't be added to.

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not, please provide details and any alternative proposals.**

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No/	/	Unsure	
-----	--	-----	---	--------	--

Please provide details

Any house built in South Lincs will sell - we are rehoming Peterborough.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No/		Unsure	
-----	--	-----	--	--------	--

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No/	/	Unsure	
-----	--	-----	---	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

All new housing/industrial units should be built to be energy neutral. Solar panels should be an integral part of all new development - electricity generation will be essential to meet the demands of electric cars, all IT requirements, etc. All developments need to be properly landscaped to include large numbers of trees, particularly industrial zones. Buffer zones to protect existing open green spaces, more pedestrian/cycling/public transport options. Revision of drainage requirements to deal with more frequent flooding; water neutral homes.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes/	/	No		Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes/	/	No		Unsure	
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Please give details.

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see14

#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

In a world facing climate change, or global warming, as an imminent disaster, not requiring higher standards is not viable - it would be deemed a dereliction of duty by the up and coming generations.

#### 16. Proposal 12 – Need for Caravan Accommodation

##### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

#### 17. Proposal 13 – Parking Standards

##### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes/	/	No		Unsure	
------	---	----	--	--------	--

Please give details

Many/most homes have at least 2 cars, but many properties on Elsea Park have space for one or none - cars are parked on pavements.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0047

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	John	
Last Name	Freeman	
Organisation	Claypole Parish Council	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone	[REDACTED]	
Email Address	[REDACTED]	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	22.11.2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No	x	Unsure	
If not please provide details.					
<p>While agreeing that the Vision should remain “broadly the same”, the impacts of the Covid 19 crisis, referred to in para 2.3 of the Issues &amp; options report cannot be understated. Although these impacts are yet to be fully understood, it is likely that they will demonstrate inequalities; that poorer people will be most impacted through loss of work and hardships, and the need to provide more work opportunities and housing close at hand; and that for “white-collar workers”, a growth in home working, reduced home to work travel, and a desire to move out of towns towards villages and occupy homes that facilitate home-working (a trend already being observed at a national level).</p> <p>The former requires a greater investment in planning and delivery than the planning system has realised to date. The latter, a more controlled approach that is not simply “market-led”, so that the “nature and character” of the District and villages themselves (stressed throughout the Local Plan) is not undermined</p>					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	x	Unsure	
If not please provide details.					
<p>Considerably greater emphasis and priority needs to be placed on facilitating employment opportunities in our towns, and for providing decent housing to support working people. Given consistent findings of a significant and worrying decrease in bio-diversity across the UK, and the conclusions of the Interim SA Report, it has to be questioned whether there remains a case for allowing large-scale housing development in even our larger villages.</p> <p>Further, policy should be progressive to anticipate and encourage all new development to be carbon neutral; housing and commercial developments should reflect a future where electric vehicles will require charging points.</p>					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No	X	Unsure	
If not please provide details.					

Broadly yes. However, the gross impact of the Covid 19 crisis on the economy and on ordinary lives suggests a strengthening of those objectives concerned with business and employment retention and expansion. Promoting additional growth “particularly in knowledge-rich business and higher skilled jobs” may be a lofty ideal but the very basic need to provide employment at all levels is becoming more vital if we are to avoid increased poverty and hardship in our town communities

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No		Unsure	
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If not please provide details.

Broadly the objectives remain relevant, but the means by which they will be achieved will need a fresh assessment and dynamic.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	x	No		Unsure	
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If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	x	No		Unsure	
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If not, please provide details of what changes you think should be made.

Broadly, the outcomes are justifiable. However the Methodology should be reviewed over the longer term

A strong criticism of the Methodology is that it fails to consider any “benefits” of village status and identity; the fact that many people choose to live in villages precisely because they want to live away from larger settlements. Hence criteria 3 – distance from another settlement – can only be correct if the objective is to encourage development in villages; but is wholly perverse if any value is attached to village identity. For example, it is the expansion of Fernwood (Newark

& Sherwood DC) by more than 2000 homes within a mile of Claypole that leads Claypole residents to be strongly against further expansion in Claypole that might lead it be becoming a part of the Fernwood conurbation or at least lose its distinct identity as a village community. It is noted that the “character and nature” of villages is repeatedly stated as being of importance in the plan and hierarchy, but not reflected by Criteria 3.

The increasing level of home working also required a fresh assessment of the hierarchy criteria. As the proportion of homeworkers increases they are likely to look for more amenities at a local level, from coffee shops to tennis courts. But under the current criteria the addition of such amenities would lead to smaller villages being re-assessed as larger villages, and the very objective of retaining a village identity lost.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No	X	Unsure	
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If not, please provide details of what changes you think should be made.

With so great a proportion of housing permissions in the major towns not having yet been developed, not least on brown field sites, it is questionable that there should be a major focus on building on greenfield sites where there is little local support.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	x	Unsure	
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If so, please outline any suitable and deliverable proposals.

It is difficult to justify any new development proposals when there are so many sites subject to approval that have not yet been fulfilled by developers.

The Interim SA report also finds little justification for the further development of larger (or smaller) villages. Rather the Interim SA warns of exacerbating the loss of bio-diversity by building in the rural areas and the establishment of a new garden village can only worsen the situation.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	x	No		Unsure	
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**If not, what evidence do you have to justify an alternative need and requirement?**

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

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**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

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**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

<b>Yes</b>		<b>No</b>	<b>x</b>	<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

The Interim SA shows little justification for continued development in larger villages. Given the longer term economic impacts of Covid 19, the priority must be to provide for the provision of more employment opportunities within the towns, and homes nearer to places of work. Further, given changes in shopping habits, providing places to live in our town centres is essential to avoid their dereliction

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

While it is agreed that it is not appropriate to make allocations in smaller settlements, the notion of “windfalls” is one which wholly undermines the very notion of a strategic approach to spatial development. By their nature, these small villages are surrounded by agricultural land, and the prospect that one individual, a landowner seeking to sell a patch of land for development and profit, can take precedent over a strategic plan or the desires of all other members of the same community is wholly undemocratic.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	x	Unsure	
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Please provide details

Market capacity and deliverability are important factors, but one that must be secondary to a strategic plan. While developers have been granted planning permission for so many sites that are still to be developed, and which are consistent with the strategic objectives of the Local Plan, ensuring the delivery of these sites has to be the priority. Conversely, allowing developers to build where, as and when they sense a market for homes, would represent complete anarchy, compromising the District Council’s ability to ensure the growth of jobs and homes to match; wholly failing to respect the “character and nature” of the District and its settlements; and a short-termism that provides no onward security or structure for planning. At a time when the gap between where we are in terms of providing employment and homes, and where we need to be, the notion of prioritising supposed marketability and deliverability, both factors determined by developers, is an anathema.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	x
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
------------	----------	-----------	--	---------------	--

**If not, please provide details.**

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
------------	----------	-----------	--	---------------	--

**If not, please provide details.**

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

<b>Yes</b>		<b>No</b>	<b>x</b>	<b>Unsure</b>	
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**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

The Interim SA Report suggests that current policies fall short of what is needed. National reports of the dramatic loss of bio-diversity in many aspects equally suggests that more can and needs to be done by District Councils, and that action is needed urgently. Those aspects of the Local Plan that would run counter to enhancing bio-diversity should be withdrawn or amended.

In all cases the Local Plan should aim to drive the provision of new standards that can encourage the move away from fossil fuels and wasted resources.

All new commercial and domestic properties should be carbon neutral, and charging for electric vehicles made integral

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

Please give details.

All development, residential or non-residential should be carbon neutral.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	--------------------------

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

<b>Yes</b>	<input checked="" type="checkbox"/>	<b>No</b>	<input type="checkbox"/>	<b>Unsure</b>	<input type="checkbox"/>
------------	-------------------------------------	-----------	--------------------------	---------------	--------------------------

**Please give details**

The interim SA Report addresses and recognises the move towards electronic vehicles requiring off-street parking. This must be recognised as we move forward. While the move to electric vehicles is currently at an early stage, it is undeniable that in a decade private electric vehicles will be the norm and that planning standards to day should recognise this.

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0048

CN:

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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Nigel	
Last Name	Percy	
Organisation		
Address	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 40px; height: 15px;"></div>	
Postcode	<div style="background-color: black; width: 60px; height: 15px;"></div>	
Telephone	<div style="background-color: black; width: 100px; height: 15px;"></div>	
Email Address	<div style="background-color: black; width: 150px; height: 15px;"></div>	

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**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 100px; height: 15px;"></div>	22 November 2020

## Part B: Issue and Options Consultation Questions

### 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

#### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes

✓

No

Unsure

If yes, please provide details.

The local plan fails to address the needs of the Gypsy and Traveller community on several counts. Firstly, the local plan is able to identify development sites for 19,000 new homes but not one pitch for the Gypsy and Traveller community. Secondly, it makes reference to the Gypsy and Traveller Accommodation Assessment 2016 (GTAA) which identifies the need for 32 pitches and was completed and adopted by the Council without any consultation with the local residents. Finally, the specific lack of provision in the plan for these pitches means that any application in relation to Gypsy and Traveller sites puts the local planning department in a difficult position, in that the criteria in H5 are ignored and planning applications drive the planning policy. That is to say, the need to meet the GTAA recommendations is greater than the quality of the development.

For example, the local plan review ignores the fact that the planning application at Cold Harbour is under appeal. The developers are convinced that they will win the appeal base on hundreds of other appeals over-turned across the country. The statistical likelihood is that it will also occur with this appeal. The Planning Department recommended the original application despite only meeting one of the five criteria set out in H5 in the emerging local plan. The site is at the confluence of the A52 and the High Dike, a small triangular piece of land – in all intents and purposes – a traffic island which has approximately 14,000 vehicles per day encircling it at speeds up to 70 miles per hour. Several applications in nearby Old Somerby have been rejected on the basis that they are not in keeping with the village, however, this is not a consideration adopted by the planning Department for the Cold Harbour application, a very small and isolated hamlet of 7 houses, one of which is Grade II listed.

The secrecy with which the GTAA recommendations have been pushed through highlights the stealth and underhand way in which planning applications like the one at Harrowby Lane have been conducted. The original application was granted for 2 pitches only to be occupied by one family. After period of about a year another application for a day block was made with cooking and washing facilities. During both the application processes no reference to the GTAA was made. Had this been included then it would be clear that the intention always was to expand the site to 6 pitches, opening it up to more families. It, therefore, can be interpreted that, as in the recommendation of the GTAA for Cold Harbour, the development at Cold Harbour will be expanded from 6 to 25 pitches. That would see an increase of the local population of the hamlet by nearly 500%.

In summary, the local plan states in H5:

- a. *the proposed site provides an acceptable living environment for its residents;*
- b. *the site has good access to the highway network and will not cause traffic congestion or safety problems;*

Both of these criteria should have rejected the application at Cold Harbour by the planning officers given its location, but the officers instead recommended it

- c. *the site is in reasonable proximity to shops, schools and health facilities;*

Again, given Cold Harbour's isolation and rural location there is no reasonable proximity to anything, no public transport not even a footway or street light

*d. the site is not identified as an area at risk of flooding in the Strategic Flood Risk Assessment (SFRA);*

This is the only criteria which the application passes

*e. the scale and layout of the site will respect its relationship with any residential (settled) community and not place undue pressure on the local infrastructure.*

With the GTAA recommendation that the site at Cold Harbour would accommodate 25 pitches (let's say 50 adults and 40-50 children) then this would completely overwhelm the established community of 15 adults and 8 children and would not be in keeping with the settled community. The local plan does not identify any sites, suitable or otherwise. This in turn fails to provide suitable guidance for residents, developers and planning officers alike. The necessity to meet the needs of the GTAA seems to override the local plan and its criteria in respect of Gypsy and Travellers. It is evident that planning applications and developers are driving the planning policy here and that the council has no control, and moreover, the District Councillors cannot demonstrate their responsibility and accountability.

### **Part C: Sustainability Appraisal Scoping Report**

#### **19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	David	
Last Name	York	
Organisation	Individual	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone	[REDACTED]	
Email Address	[REDACTED]	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	21 <sup>st</sup> Nov 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	X		No		Unsure
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	X		Unsure
If not please provide details.					
Every new dwelling should be developed complete with solar thermal panels and pv panels appropriate for the dwelling (or dwellings in the case of apartment blocks). These are proven systems that require little maintenance. In the case of council owned properties, FIT revenue will more than pay for these installations over a period of years. In addition the use of air source and/or ground source heating systems should become mandatory for new buildings. These measures would have a very significant impact on the amount of renewable energy used I a community with great reduction in carbon emissions and increase climate change benefits,					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No	X		Unsure
If not please provide details.					
Every new dwelling should be developed complete with solar thermal panels and pv panels appropriate for the dwelling (or dwellings in the case of apartment blocks). These are proven systems that require little maintenance. In the case of council owned properties, FIT revenue will more than pay for these installations over a period of years. In addition the use of air source and/or ground source heating systems should become mandatory for new buildings. These measures would have a very significant impact on the amount of renewable energy used I a community with great reduction in carbon emissions and increase climate change benefits,					

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No	X	Unsure	
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If not please provide details.

See above

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No	X	Unsure	
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If not please provide details

Technology is changing at an ever increasing rate As new technologies develop, SKDC needs to be ready to make changes to plans on a more regular basis. The plan should be reviewed on a five yearly basis.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	X	No		Unsure	
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If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	X	No		Unsure	
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	X	Unsure	
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	X
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If not, what evidence do you have to justify an alternative need and requirement?

Post Brexit, it may be that many ‘Europeans’ decide to return whence they came. Though not as densely populated with them as South Holland, there are still significant numbers renting houses in Bourne for example. This could release properties in the coming years.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

However, the growth needed needs to be balanced, so that new jobs are in similar proportion to new properties. These must not become dormitory towns.

### Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	X
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If not, please provide details and any alternative proposals.

For reasons stated above, the need for new homes is uncertain. However for a healthy level of prosperity, creation of new jobs must be the priority!

### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
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Please provide details

There is no point building if there is no demand and from a sustainability perspective it would be counterintuitive. As stated above the need for new housing post Brexit is uncertain.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

## 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	X
If yes, please provide details.					

<b>13. Proposal 9 – Revisions to the Employment Policy</b>					
<b>Q9a – Strategic Employment Allocations</b>					
Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?					
Yes	X		No		Unsure
If not, please provide details.					
However, it should be noted that commercial office needs post COVID are likely to be much reduced, following the success of 'work from home'. There fore the proportion of land for such use should be reduced accordingly and focus made land for manufacture, distribution, storage, food processing and the like.					
<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?					
Yes	X		No		Unsure
If not, please provide details.					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
Yes		No		Unsure	
If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.					
Every new dwelling should be developed complete with solar thermal panels and pv panels appropriate for the dwelling (or dwellings in the case of apartment blocks). These are proven systems that require little maintenance. In the case of council owned properties, FIT revenue					

will more than pay for these installations over a period of years. In addition the use of air source and/or ground source heating systems should become mandatory for new buildings. These measures would have a very significant impact on the amount of renewable energy used in a community with great reduction in carbon emissions and increase climate change benefits.

In addition, with regard to waste (an important subject not mentioned at all), SKDC should look at how re-use and recycling can be improved. The old 'buy and return' for glass bottles and jars worked well years ago and could again. This is probably a national issue, but SKDC could be a leader and encourage the principle for local food/drink producers.

Also on waste, the issue of 'which plastics can I put in my grey bin?' needs to be resolved. Another national subject, where government policy should dictate that ALL plastic packaging must be recyclable, but where local companies could be encouraged – maybe through business rateable value benefit (or similar).

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	X	No		Unsure	
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##### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	X		No		Unsure	
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Please give details.

For 'indoor activity' similar energy performance standards should apply. For warehouse activity, where movement in and out of buildings may be very frequent, then the use of rapid self-closing doors should be mandatory (with appropriate H&S measures to prevent collisions with plant or personnel)

##### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

**Please give details**

The design life of buildings is important to consider. This ought to be a minimum of fifty years. Over such a period, the environmental payback of increased energy performance standards can be assured. The principle of demanding increase energy efficiency is already well established, with older housing stock having an array of possible improvements, double glazing, loft insulation, external insulation skin and so on. Increased standards should be sought until it can be demonstrated there is no environmental payback. (carbon input in manufacture/installation, compared to carbon savings during the building lifetime)

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	X
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**Please give details**

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	X		No		Unsure	
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**Please give details**

The planning policy some years ago to reduce parking allocation per property was a crude and failed attempt to move people from cars to public transport – it did not and will not work. The result in Bourne has been some annoying and dangerous roadside parking.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

No comment

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

This involves analysing whole life cost of development in both financial and carbon terms, plus how much recycled materials have gone into the development as opposed to natural (aggregates, timber, glass, plastic etc)

Building research Establishment may have a computer model to assist any appraisal.

**Thank you for responding to this consultation.**



**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	<b>Coordinator</b>	
<b>First Name</b>	<b>Anne</b>	
<b>Last Name</b>	<b>Gayfer</b>	
<b>Organisation</b>	<b>South Lincolnshire Green Party</b>	
<b>Address</b>	██████████ ██████████	

<b>Postcode</b>	██████████	
<b>Telephone</b>		
<b>Email Address</b>	████████████████████████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

<b>Signature (please type for an electronic response)</b>	<b>Date</b>
██████████	22 November, 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
<b>Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not please provide details.</b>					
<i>This question has been dealt with below</i>					
<b>Q1b – The Vision</b>					
<b>Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?</b>					

Yes	As far as it goes, but it is not ambitious enough		
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**If not please provide details.**

*The vision is fine. However, in order to achieve true sustainability, within the bounds of the climate change projections and the need to achieve mitigation and adaptation that will permit the district to thrive, the council must recognise that there is an over-demand on land supply in the UK caused by us outsourcing many of our needs. For example, self-sufficiency in food has dropped since the 1970s to a situation where we import almost half of our food, even though we could still produce it. This may not be sustainable or available in the future and we should be looking at increasing self-sufficiency more. Increasing supply of land for housing is therefore a disastrous policy. Covid has changed shopping habits. Having to work at home has changed commuting habits and people who could not use computers have learned to do so, leaving some behind the digital divide. Many people have also discovered fitness*

*To “new normal” needs to be a long way from the “old normal”*

- enhancing of the natural environment is not an add-on. Trees mitigate extremes of heat and cold, they purify air and reduce respiratory infections and are also beneficial to mental health. Green infrastructure is much better than concrete drains etc for dealing with excessive water run-off.*
- town centres need to be revitalised for housing by making use of sites previously designated “brown-field” and flats over shop. We therefore support objective 7.*
- with the focus now on electric bikes, joined up and safe cycling and walking lanes need to be a priority in all towns and routes between the major towns should have cycle routes*
- if we don’t truly embrace skills for the future now, it will be too late. This includes knowing how to cook and grow food, repair items, basic DIY and the need extends to adults*
- a re-use and recycle mentality, possibly via repair shops/cafes must be facilitated sharing of carbon-guzzling items e.g. cars and machinery should be facilitated*
- more allotments should be available as it is clear that nutrition is critical to health and the ability to withstand new diseases which will be more prevalent if we continue to put pressure on remote parts of the world to deliver our needs*
- growth should be re-defined. Economic growth is the “old”, sustainable growth is an oxymoron. We should be aiming for living within our means*
- homes should be zero carbon. We can’t afford to put this off*
- town centres should have 20mph speed limits to make it safer for pedestrians and cyclists and provide room for cycle lanes. We therefore support objective 8 <http://www.20splenty.org/tags/benefits>*
- training in IT skills should be free and accessible, perhaps building on the model used by the U3A where people buddy up to help each other*

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

**Do you agree that the Objectives should remain the same for the new plan?**

		<b>No</b>			
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**If not please provide details.**

- *the environmental objectives should be first - integral of the economic objectives. Without the environment, you have no economy*
- *good design and improved networks should be a priority (objective 12), but not as a sub-set of development*
- *we support objective 13, green infrastructure for mitigating flooding and other extreme weather events*
- *we support objectives 14 and 15, prudent use of fine resources and reduction in pollution*

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

		<b>No</b>			
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**If not please provide details.**

*We have not had the time to examine the list of policies provided, which you believe are working well. However, in general we do not agree because they do not take into account that there now really is a climate emergency and the policies are not in accord with the comments we have made as regards Vision and Objectives. Neither are they likely to contribute to achieving the statutory requirements of the Climate Change Act 2008. You need to have a fundamental re-think in order to get the objectives in an order that achieves sustainability in the district. Your plans might have been robust 20-30 years ago, but they need to be brought up to date because public authorities have a duty to set and example and lead. There is no vision.*

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

*No comment*

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not, please provide details of what changes you think should be made.

*No comment*

#### Q5b – Settlement Hierarchy Methodology

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes

No

Unsure

If not, please provide details of what changes you think should be made.

*No comment*

#### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes

No

Unsure

If so, please outline any suitable and deliverable proposals.

*No comment*

### 10. Proposal 6 – Housing Need and Requirement

#### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

No

If not, what evidence do you have to justify an alternative need and requirement?

*No. There is an alternative and well-founded view that housing acquired as an investment is as strong a driver as the need for living accommodation. Indeed, there is also evidence that the UK has sufficient housing in areas where it needs it and that the increase in house building is simply a pack-of-cards-economic-growth with no foundation that will come crashing down. To be truly sustainable, we should be capitalising on the buildings we have, consolidating the accommodation we have and not providing new. To do this, the council should consider re-designating buildings that are for non-domestic use, to domestic use and refurbishing them to Energiesprong standards*

### 11. Proposal 7 – Distribution of Growth

#### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

No

If not, please provide details and any alternative proposals.

*The answer to Q6 means we do not agree with the proposals in Q7 about foci for growth*

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please provide details**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If yes, please provide details.**

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

				<b>Unsure</b>	
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If not, please provide details.

*It would have been helpful if you could have hyperlinked through to the Policies, as to not do so makes it almost impossible to locate them.*

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not, please provide details.

### 14. Proposal 10 – Climate Change

#### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

		<b>No</b>			
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

*We have mentioned elsewhere the unrecognised over-demand for land, which a bit of research will show you that this is a real and massive problem. The demands for a satisfied population are food, shelter and energy, work is also good. Land must be multi-functional in the future. The way you are designing the future of our district is NOT sustainable. Just providing short term employment and profit through housebuilding is catastrophic for the future as it ignores our energy requirement, assuming it to be provided nationally, when it might not, and the same for food supply. Changing farming practice, to make space for nature, improving green infrastructure and renovating existing housing will provide a more sustainable future. The population is not increasing. Trying to drive demand for our area is not sustainable - it simply pits us against other areas. Spend time co-operatively and don't waste energy fighting for a limited pot. There are economic benefits of green infrastructure, in addition to mitigating extremes of temperature and reducing the impact of severe weather events, such as providing food or a material for a managed wood supply. The estimated cost of mental health to the economy is £123bn per annum, which is more than the entire NHS budget. The impact on green infrastructure*

to health, including mental health is well documented and this is just one such document [https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/migrated-legacy/PublicHealthandLandscape\\_CreatingHealthyPlaces\\_FINAL.pdf](https://landscapewpstorage01.blob.core.windows.net/www-landscapeinstitute-org/migrated-legacy/PublicHealthandLandscape_CreatingHealthyPlaces_FINAL.pdf)

## 15. Proposal 11 – Energy Performance Standards

### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes, or higher, though I thought the Code had been [withdrawn](#)

### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes

No

Unsure

Please give details.

*Energy may be cheap now, but it won't be always. Houses should be designed to last and be low energy. It would be a wise investment to build all new homes with the ability to supply their own power, or a significant percentage of it - geothermal and solar can do this - because the grid may not always be reliable*

### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

*It's immoral to sacrifice energy performance for viability. If other local authorities can build zero carbon homes, SKDC must be able to. There are builders who specialise in this. Sero Homes, Melius Homes and growing. Energiesprong for refurb*

*I wrote to you councillor who holds the housing portfolio with a list of authorities who have built or refurbished homes with zero or minimal energy requirements, and they include NKDC, Mansfield, Nottingham City. Sadly now we are leaving the EU grant funding to support this may no longer be available, but builders are finding ways of making homes "viable"*

## 16. Proposal 12 – Need for Caravan Accommodation

### Q12 – Need for Caravan Accommodation

**Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details**

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details**

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**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

--

**Thank you for responding to this consultation.**

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# FREETHS

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Roger Ranson  
Head of Planning Policy  
South Kesteven District Council  
Council Offices  
St. Peter's Hill  
Grantham  
NG31 6PZ

Direct dial: [REDACTED]  
Direct fax: [REDACTED]  
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Email: [REDACTED]

20 November 2020

Our Ref: MBA/2003

By Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Dear Roger

## RESPONSE TO ISSUES AND OPTIONS CONSULTATION SKDC LOCAL PLAN REVIEW (2041)

We are instructed by our client, Padley, to make representations to the Issues and Options consultation in respect of the South Kesteven District Council ("SKDC") Local Plan Review (2041). Our client has land promotion interests in Bourne and will be submitting a detailed Call for Sites submission in due course.

### **Question 1a – The Vision: *Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?***

Yes we agree that the vision should be broadly the same but updated to reflect the plan period and housing growth level. Bourne should continue to play a key role in the vision of the Local Plan.

### **Question 2 – Objectives: *Do you agree that the Objectives should remain the same for the new plan?***

We agree that Objective 6 should remain and that the market towns of Stamford, Bourne and The Deepings should continue to play a critical role in supporting Grantham in the delivery of development.

### **Question 3 – Policies not proposed to be changed significantly: *Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?***

Policy BRN1: Bourne Housing Need is a policy that is listed as not being proposed to be changed significantly. We do not agree that BRN1 should be on this list and it is premature for it to be so.

Please read our Data Protection Privacy Notice at [www.freeths.co.uk](http://www.freeths.co.uk)

BRN1 advises that 1 housing site is allocated through the adopted SKDC Plan 2020, BRN1-H1, and that additional sites for a minimum of 100 new additional homes will be identified through the Neighbourhood Plan.

Having regard for the fact that housing requirements will significantly increase within the District for the Local Plan Review period and that Bourne as a sustainable market town will have an important role to play in meeting that requirement, Policy BRN1 will need to be adjusted to reflect that further allocations are required. Further, it is recommended that these allocations are not left to the Neighbourhood Plan process alone, particularly if the Neighbourhood Plan is advanced based on the adopted SKDC Plan requirements. To safeguard sufficient delivery of sites within Bourne, Policy BRN1 should be revised to a) allow further allocations and b) if there is to be a reliance on the Neighbourhood Plan to allocate part of Bourne's requirements, that a review mechanism be included in the event that sites are not identified within a specific timescale from adoption.

**Question 4 – Plan period: *Do you agree with the proposed plan period up to 2041?***

We support the proposal to extend the plan period up to 2041. This accords with paragraph 22 of the NPPF which requires that strategic policies should look ahead over a minimum 15 year period from adoption.

In terms of the Local Plan Review timetable in general, we note that submission to Secretary of State is not proposed until December 2023 and adoption is not scheduled until December 2024. Whilst this in itself may accord with the requirements set out in the adopted SKDC Plan and national policy, each year that passes in the intervening period is a year with a lower housing requirement than would be required by the standard methodology. To boost housing delivery we would suggest that the Local Plan Review could be conducted within a shorter timescale without compromising the quality of the plan preparation.

**Question 5a – Settlement Hierarchy: *Do you think the Settlement Hierarchy should be retained in the new Local Plan?***

We are broadly supportive of the retention of the settlement hierarchy and the position of Bourne as a market town.

**Question 6 – Housing Need and Requirement: *Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?***

At the time of publication of the Issues and Options report and on the basis of using the 2014 based household projections and the 2018 affordability ratios, the housing requirement of 754 dwellings per annum is correct. Clearly this will need to be amended to reflect both updates to the data and any alterations to the methodology once finalised by the Government, and the Issues and Options report recognises this.

**Question 7b – Stamford, Bourne and The Deepings: Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

We agree that the Market towns should remain as a focus for growth. However, we consider that there is clear evidence to suggest that Bourne can support a higher allocation of growth over the revised plan period. The first table below is taken from the Topic Paper 2: Housing Land Supply as part of the examination into the adopted SKDC Local Plan (2020). The second table is extracted from the Issues and options document.

*Table 1: 1 April 2011 - 31 March 2018 Completions by year and settlement*

Settlement	11/12	12/13	13/14	14/15	15/16	16/17	17/18	Survey Years	Total
Grantham	145	107	221	224	185	72	150	58	1162
Stamford	78	82	41	38	32	141	71	27	510
Bourne	129	154	149	216	149	136	121	45	1099
Market Deeping	60	82	42	131	68	40	14	29	466
Larger villages	56	55	58	32	55	44	41	68	409
Smaller villages	26	17	30	11	6	21	31	42	184
<b>District Total</b>	<b>494</b>	<b>497</b>	<b>541</b>	<b>652</b>	<b>495</b>	<b>454</b>	<b>428</b>	<b>269</b>	<b>3830</b>

	Local Housing Need, 2018 to 2041	Potential spatial distribution	Net completions April 2018 – March 2020	Commitments as at 1 <sup>st</sup> April 2020	Capacity to be identified in the Local Plan review	TOTAL (including 10% buffer to supply)
Grantham		50-55%	447	8,728	363 - 1,317	9,538 – 10,492
Stamford		15-18%	384	2,395	82- 655	2,861 – 3,434
Bourne		8-10%	415	747	364 - 746	1,526 - 1,908
The Deepings		8-10%	52	1,181	293 - 675	1,526 - 1,908
Larger Villages		8-10%	90	1,375	61 - 443	1,526 - 1,908
Supply in other settlements and windfall allowance across the District		No set percentage – to be determined by existing commitments and through windfalls	28*	265*	600**	893
<b>DISTRICT TOTAL</b>	<b>23 years @ 754 dpa = 17,342</b>		<b>1,416</b>	<b>14,691</b>	<b>1,763 - 4,436</b> <b>NB: 2,969 required to achieve 10% buffer</b>	<b>19,076 including 10% buffer</b>

\* Accommodated on identified sites throughout the District outside of Grantham, Stamford, Bourne, The Deepings and all Larger Villages

\*\* Figure currently based on 30 dwellings per annum 2021-41, to be accommodated throughout the District

What these tables demonstrate is that Bourne has a proven track record of delivering development over a prolonged period of time. From 2011/12 to 2019/20 Bourne has almost kept pace with Grantham for housing delivery, despite the latter being the sub-regional centre, top of the hierarchy and the principal focus for housing allocations in the adopted plan. Furthermore Bourne has significantly out-performed the other Market towns in respect of delivery, broadly tripling the amount of houses provided in The Deepings. This record of delivery points towards Bourne having a higher housing distribution than that set out in the above table. Given the scale of the challenge of accommodating an increased housing requirement, the Plan review needs to focus on settlements with a strong delivery record. We recommend that Bourne's potential spatial distribution is increased and options for the thresholds of this are tested through the Sustainability Appraisal.

**Question 7e- Consideration of the Market Capacity and Deliverability: *Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?***

Yes we agree that market capacity and deliverability should be considered in determining growth distribution. The evidence in the tables above confirm that Bourne is the best performing settlement for housing delivery since 2011/12 when you compare the size of settlements to actual houses delivered.

**Question 14 – Any Other Comments**

We have reviewed the Interim Sustainability Appraisal (October 2020) and note the appraisal of options for growth in Stamford, Bourne and The Deepings as a collective tier within the settlement hierarchy. We note that the Sustainability Appraisal provides three options:

- Option MT1: Continue the current Local Plan's focus of growth on Stamford, Bourne and The Deepings.
- Option MT2: Renew and increase the focus of growth on Stamford, Bourne and The Deepings.
- Option MT3: Reduce the focus of growth on Stamford, Bourne and The Deepings

As set out in response to question 7b we consider that there is strong justification for Bourne to take a higher percentage of growth than is currently proposed. As a further detailed grain of assessment beyond the proportion of development that is directed to market towns as a whole, the Sustainability Appraisal should analyse the ability of individual settlements at market town level to accommodate different levels of development.

Yours sincerely

Mark Bassett  
Principal Manager.

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REF: SK.IAO.0052

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ADD:



SOUTH  
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COUNCIL

**South Kesteven District Council Local Plan Review  
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Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

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The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

### Part A: Personal Details

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Chris	
Last Name	Charlton	
Organisation	Rippingale Parish Council	
Address	██████████ ██████████ ██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
Email Address	████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
If you do not wish to be added or would like your details to be removed, then please select the following box	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

### 4. Please Sign and date this form

Signature (please type for an electronic response)	Date
████████████████████	23 November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No		Unsure	
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

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**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
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If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

--

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>		<b>No</b>	<b>/</b>	<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

*Objective 5 states: To facilitate and sustain a network of sustainable communities which offer a sense of place, that are safe, inclusive and can respond to the needs of local people, establishing an appropriate spatial strategy that will guide the scale, location and form of new development across the District, providing the long term basis for the for the planning of South Kesteven.*

It is seen that no housing allocation to smaller settlements does not meet this objective. Such a policy will hinder the development opportunities for the smaller villages and inhibit their sustainability. With the demise of small farms and large houses with large garden plots, as older residents die, there are many old derelict small farmyards and plots which become available in the body of the villages for small housing development. If there is not an annual allocation then these sites will remain derelict and be an eyesore and inhibit the villages’ environment. Past sympathetic housing development of such sites has seen new residents, some with young children, come into the villages, engendering a better, balanced population. It should also be noted that COVID 19 is rebalancing where work is being carried out; many people will now spend a substantial part of their time working from home as businesses learn new working practices and cut office space. Nationally, this is already seeing many people moving from urban to rural settings, to take advantage of a better lifestyle. We should be encouraging these workers into our smaller settlements to take advantage of their vitality and contribution to sustainability, hence the need to have an annual allowance in the smaller settlements.

It is seen that the current Local Plan to 2036 allocates as follows:

*In the Smaller Villages, (as listed in Policy SP2) there is limited capacity to accommodate new development, and whilst previously planning policies strictly limited development in these locations, it is the intention of the Local Plan to allow small, sensitive infill developments (generally expected to be no more than 3 dwellings annually) so that these smaller communities can positively respond to the housing needs of their people and fulfil their role as sustainable communities.*

It is very strongly contended that this policy remains in the new Plan.

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please provide details**

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Show people Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

--

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

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Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

--

#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes

No

Unsure

Please give details

### 17. Proposal 13 – Parking Standards

#### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes

No

Unsure

Please give details

### 18. Any other Comments

#### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

## Part C: Sustainability Appraisal Scoping Report

### 19. Comments about the Sustainability Appraisal Scoping Report

**Thank you for responding to this consultation.**

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	Angela	
Last Name	Tarsey	
Organisation		
Address	[REDACTED]	
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23 November 2020

## Part B: Issue and Options Consultation Questions

### 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

#### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes

✓

No

Unsure

If yes, please provide details.

The local plan fails to address the needs of the Traveller community on several counts.

Firstly, the local plan is able to identify development sites for 19,000 new homes but not one pitch for the Traveller community. Secondly, it refers to the Gypsy and Traveller Accommodation Assessment 2016 (GTAA) which identifies the need for 32 pitches and was completed and adopted by the Council without any consultation with the local residents.

Finally, the specific lack of provision in the plan for these pitches means that any application in relation to Gypsy and Traveller sites puts the local planning department in a difficult position, in that the criteria in H5 are ignored and planning applications drive the planning policy. That is to say, the need to meet the GTAA recommendations is greater than the quality of the development. For example, the local plan review ignores the fact that the planning application at Cold Harbour is under appeal.

The developers are convinced that they will win the appeal based on hundreds of other appeals over-turned across the country. The statistical likelihood is that it will also occur with this appeal.

The Planning Department recommended the original application despite only meeting one of the five criteria set out in H5 in the emerging local plan. The site is at the confluence of the A52 and the High Dike, a small triangular piece of land – in all intents and purposes – a traffic island which has approximately 14,000 vehicles per day encircling it at speeds up to 70 miles per hour. Several applications in nearby Old Somerby have been rejected on the basis that they are not in keeping with the village, however, this is not a consideration adopted by the planning Department for the Cold Harbour application, a very small and isolated hamlet of 7 houses, one of which is Grade II listed.

The secrecy with which the GTAA recommendations have been pushed through highlights the stealth and underhand way in which planning applications like the one at Harrowby Lane have been conducted. This is simply not acceptable.

The original application was granted for 2 pitches only to be occupied by one family. After period of about a year another application for a day block was made with cooking and washing facilities. During both the application processes no reference to the GTAA was made. Had this been included then it would be clear that the intention always was to expand the site to 6 pitches, opening it up to more families. It, therefore, can be interpreted that, as in the recommendation of the GTAA for Cold Harbour, the development at Cold Harbour will be expanded from 6 to 25 pitches.

That would see an increase of the local population of the hamlet by nearly 500%.

In summary, the local plan states in H5:

- a. *the proposed site provides an acceptable living environment for its residents;*
- b. *the site has good access to the highway network and will not cause traffic congestion or safety problems;*

Both of these criteria should have rejected the application at Cold Harbour by the planning officers given its location, but the officers instead recommended it

- c. *the site is in reasonable proximity to shops, schools and health facilities;*

Again, given Cold Harbour's isolation and rural location there is no reasonable proximity to anything, no public transport not even a footway or street light

- d. *the site is not identified as an area at risk of flooding in the Strategic Flood Risk Assessment (SFRA);*

This is the only criteria which the application passes

- e. *the scale and layout of the site will respect its relationship with any residential (settled) community and not place undue pressure on the local infrastructure.*

With the GTAA recommendation that the site at Cold Harbour would accommodate 25 pitches (let's say 50 adults and 40-50 children) then this would completely overwhelm the established community of 15 adults and 8 children and would not be in keeping with the settled community. The local plan does not identify any sites, suitable or otherwise. This in turn fails to provide suitable guidance for residents, developers and planning officers alike. The necessity to meet the needs of the GTAA seems to override the local plan and its criteria in respect of Gypsy and Travellers. It is evident that planning applications and developers are driving the planning policy here and that the council has no control, and moreover, the District Councillors cannot demonstrate their responsibility and accountability.

### **Part C: Sustainability Appraisal Scoping Report**

#### **19. Comments about the Sustainability Appraisal Scoping Report**

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Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Ms
First Name		Sue
Last Name		Green
Organisation		Home Builders Federation (HBF)
Address		████████████████████ ████████████████ ██████████████
Postcode		████████
Telephone		██████████████
Email Address		████████████████████

**Please note:** that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████	23/11/20

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	X	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	X	No		Unsure	
If not please provide details.					

<b>6. Proposal 2 – Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	X	No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	X	Unsure	
If not please provide details.					
<p>The Council cannot be definitive that the listed adopted Policies will not significantly change. Future revisions to national policy may impact upon Policies SD1, H2, H4, EN2 and DE1. The final determination of the housing requirement quantum and its spatial distribution may influence Policies SP3, SP4, SP5 and H1. Updated viability evidence may affect Policies H2, H3 and H4.</p>					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	X	No		Unsure	
If not please provide details					

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<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
<b>Do you think the Settlement Hierarchy should be retained in the new Local Plan?</b>					
<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
<b>If not, please provide details of what changes you think should be made.</b>					
The retention of the Settlement Hierarchy will be influenced by the housing requirement figure and proposed spatial distribution strategy. See HBF answers to Q6 and Q7 below.					
<b>Q5b – Settlement Hierarchy Methodology</b>					
<b>Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details of what changes you think should be made.</b>					
No comment.					
<b>Q5c – New Settlement</b>					
<b>Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If so, please outline any suitable and deliverable proposals.</b>					
See HBF answer to Q5a above.					

<b>10. Proposal 6 – Housing Need and Requirement</b>					
<b>Q6 – Housing Need and Requirement</b>					
<b>Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?</b>					
<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
<b>If not, what evidence do you have to justify an alternative need and requirement?</b>					
As set out in the NPPG, the Local Housing Need (LHN) is calculated at the start of the plan-making process however this number should be kept under review until the Local Plan Review (LPR) is submitted for examination and when appropriate revised (ID 2a-008-20190220). The minimum LHN may change as inputs are variable and this should be taken into consideration by the Council.					

The latest LHN calculation using the 2014-based SNHP and the 2019 affordability ratio is 732 dwellings per annum.

The Government's standard methodology identifies the minimum annual LHN as a starting point. It does not produce a housing requirement figure (NPPG ID : 2a-002-20190220). The Government's objective of significantly boosting the supply of homes as set out in the 2019 NPPF remains (para 59). Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere may necessitate a housing requirement figure above the minimum LHN.

The Government has also confirmed its intention to review the standard methodology. Using the Government's revised standard methodology as set out in the consultation ended on 1 October 2020, the minimum LHN for South Kesteven increases to 839 dwellings per annum.

The LHN and housing requirement should be kept under review. The final figures are likely to be higher than 754 dwellings per annum.

## 11. Proposal 7 – Distribution of Growth

### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

The focus for growth in the adopted Local Plan is 53% in Grantham, 18% in Stamford, 7% in Bourne, 8% in The Deepings, 10% in Larger Villages and 4% in Smaller Villages. The Council propose to retain this focus of growth in the LPR. The starting point for the spatial distribution in the LPR is 50 – 55% in Grantham, 15 - 18% in Stamford, 8 - 10% in Bourne, 8 - 10% in The Deepings and 8 - 10% in Larger Villages. Local communities living in the smaller towns and larger villages will be supported by the proposed pattern of development. However, local communities living in the smaller villages may be disadvantaged. The Council should confirm that the proposed spatial distribution meets the locational housing needs of the resident population. The LPR should meet the housing needs of both urban and rural communities. A more dispersed the pattern of development will also diversify housing land supply (HLS) and optimise housing delivery.

### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

See HBF answer to Q7a above.

### Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

See HBF answer to Q7a above.

#### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

See HBF answer to Q7a above.

#### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
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Please provide details

Market capacity and deliverability (absorption rates) are a consideration in determining an appropriate spatial distribution.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

### 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

#### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

No comment.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

No comment.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details.**

No comment.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

Existing adopted Climate Change Policies should be reviewed. The Council should not be getting ahead of Government proposals for national policy concerning climate change. The Future Homes Standard consultation (ended on 7<sup>th</sup> February 2020) set out the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. This consultation addressed options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations. In a separate consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7<sup>th</sup> October 2019), the Government also set out a preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010. These proposed changes to Building Regulations may render the Council's adopted policies as unnecessary.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**Please give details.**

See HBF answer to Q10 above.

**Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

**Please give details**

At the plan-making stage, viability is inseparable from the deliverability of development. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2019 National Planning Policy Framework (NPPF), viability testing should assess the cumulative impact of affordable housing provision, policy compliant requirements, infrastructure and other contributions so that there is sufficient incentive for a landowner to bring forward their land for development. Development should not be subject to such a scale of obligations that the deliverability of the South Kesteven's LPR is threatened (para 34).

The Government's Future Homes Standard estimated costs of £2,557 per dwelling for Option 1 or £4,847 per dwelling for Option 2. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per space plus any costs for upgrading local electricity networks. These costs should be included in the Council's viability assessment.

Developer contributions should not be artificially reduced to cover the cost of other developer contributions. The Savills / HBF CIL Getting It Right publication dated January 2014 illustrated that viability becomes increasingly challenging where residential sales values are lowest. Viability assessment is an iterative process, where residential values are lowest "trade-offs" between affordable housing provision, CIL / S106 contributions and any other policy compliant requirements may be necessary.

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

**Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

**Yes**

**No**

**Unsure**

**Please give details**

No comment.

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

**Yes**

**No**

**Unsure**

**Please give details**

Any Parking Standards Policy introduced by the LPR should be consistent with 2019 NPPF (paras 105 & 106) and supported by robust evidence justifying its necessity for managing the local road network.

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

No comment.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

No comment.

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0055

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Roy	
Last Name	Knighton	
Organisation		
Address	<div style="background-color: black; width: 150px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 60px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 70px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 50px; height: 15px;"></div>	
Postcode	<div style="background-color: black; width: 60px; height: 15px;"></div>	
Telephone	<div style="background-color: black; width: 100px; height: 15px;"></div>	
Email Address	<div style="background-color: black; width: 170px; height: 15px;"></div>	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 100px; height: 15px;"></div>	23 November 2020

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

**If not please provide details.**

Yes, but in “Villages and Countryside” the role of the newly defined smaller villages in the settlement hierarchy is not clear. Suggest adding:

“Even smaller villages should enjoy some sensitive development to continue to play a role in the economy and to support services in nearby larger villages.”

Updating the demand target is important and all levels in the settlement hierarchy will need to play a role in meeting demand, including smaller villages. SKDC needs to be bolder in its approach to development in smaller villages and to be more upfront in this matter. Given that there has been a presumption against development in smaller villages for the past 15 years, it would be expected that the introduction of new policies in January 2020 would bring forward a large number of applications, but the results so far have been relatively modest.

The government’s policy is to build more as ever-increasing house prices in the UK reflect a continuing shortage in supply. The government’s demand methodology should have been adopted in the first version of the Local Plan.

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	X
-----	--	----	--	--------	---

**If not please provide details.**

Increasing the housing supply supports economic growth. It also has a more direct impact on the local economy. The vision is still very much a focus on Grantham and the three market towns with a resulting emphasis on large scale housing developments which will benefit large construction companies rather than local developers and tradesmen. The vision needs to be broader and more balanced and be more positive about development in the villages, both large and small, rather than proposing a continued piecemeal approach without much conviction. Obviously, it is development in the “villages and countryside” that will provide opportunities for local employment for planners, architects, solicitors, developers, and local tradesmen. In addition, it is no longer agriculture that is the main source of employment in the villages but rather a range of employment opportunities created by small businesses working from home.

**6. Proposal 2 - Objectives**

## Q2 – Objectives

Do you agree that the Objectives should remain the same for the new plan?

Yes	X	No		Unsure	
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If not please provide details.

## 7. Proposal 3 – Policies not proposed to be changed significantly

### Q3 – Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not please provide details.

Comments on SP3 Infill and SP4 Edge of Settlements:

Although recognised by the NPPF para 78, the Local Plan does not seem to acknowledge that development in smaller villages will support services in nearby larger villages... that is how the market works. Perhaps some words to this effect could be added in para 2.12 on page 27 of the Local Plan, namely in the introduction to the new policies, SP3 and SP4.

While SP4 seems a useful policy for some sensitive development, its implementation is hindered by the requirement of criterion a) contained within the policy for a pre application community consultation. There were many comments against this requirement in the previous local plan consultations, several even saying that this policy could never be successfully implemented. There is no clear guidance contained within the Local Plan on how this process should be carried out, no definition on what “substantial support” means, how it can be quantified or what “proportionate pre-application community consultation” is.

The council responded that this requirement is similar to the neighbourhood plan (NP) concept. But a NP is a structured and well managed concept and must be in general conformity with strategic policies of the Local Plan. A NP does not deal directly with individual planning applications or specific details at this level and is more focused on the general land use planning of a shared vision for neighbourhoods. A NP forms part of the development plan and is reviewed by qualifying bodies to ensure they remain consistent with the development plan. The NPPF in para 29 also underlines that a NP should not obstruct development or undermine policy. In the case of a planning application, a community consultation will always involve local personalities, conflicting interests, alliances and even wider national issues which currently divide communities, thus undermining genuine material planning considerations.

Given that less and less infill opportunities will arise as time goes by, the SP4 policy should remain, but it should be assessed entirely on material planning considerations, with public consultation still being available through normal representations after a planning application has been submitted. It is fundamentally unfair and unreasonable to expect individual applicants to attempt to gather support from neighbours where those neighbours already have the opportunity to

express views through Planning legislation. It is human nature that people are more likely to put negativity in a formal response than positivity.

Pre-application consultation with local communities is required for certain large-scale major applications where developers must account for how they have taken on board any comments received as part of the planning application submission where impacts of the development could be significant to surrounding areas. How is this relevant for local applications for small scale development? The statutory neighbour notification and publicity provides the opportunity for views of the local community to be expressed and taken into account by the case officer. The demonstration of substantial community support should not be a policy requirement.

I have hesitated to provide comments on SP4 as I have a lodged an application under this policy with SKDC which is under consideration; however, it would be a missed opportunity for lessons in practice to be learned at an early stage of the newly adopted plan. The planning department is well aware of the issues raised in the community support exercise we undertook prior to our application. The exercise was acrimonious as it led to personal messages being sent which could be considered aggressive and intimidating. We were also led to believe that there were attempts on social media, at both the preapplication and application stages, to misrepresent our application in order to influence the community support process and for villagers to make representations against the application. These events have been very distasteful and have served to split the village and seem to benefit no party involved. Possibly it is in anticipation of such problems that few applications under SP4 seem to be coming forward? Only four applications under SP4 have been found on the website of which two have been refused for not showing any evidence of local support, the community support exercise not having been undertaken (see also Q7d).

I would also suggest that the criteria for SP4 should be tightened up somewhat on two counts. While the criteria under paras b) to f) are satisfactory, I believe there is an important criterion missing. It is referred to on page 27 para 2.13 of the Local Plan but it should also be summarised in the main policy criteria. This is the requirement for an SP4 site to be substantially enclosed and contained by physical boundaries such as a road, acting as a barrier to further growth. In this way, the fact that a site is well contained would imply that is not an incursion into open countryside, in line with para d) of the policy. A second related point follows from para 79 d) in the NPPF concerning isolated dwellings, which says that a dwelling is not isolated if it is part of an existing residential dwelling. I believe a further consideration therefore under SP4 might be one favouring development involving a suitable sub division of a residential property, subject to appropriate housing densities being met.

## 8. Proposal 4 – Plan Period

### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes	X	No		Unsure	
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If not please provide details

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## 9. Proposal 5 – Settlement Hierarchy

### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details of what changes you think should be made.

It was encouraging to see a list of settlements where housing development will be allowed and this list should be maintained. It enables applicants to be able to plan and to better understand the chances of getting consent on an application.

### Q5b – Settlement Hierarchy Methodology

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	X
-----	--	----	--	--------	---

If not, please provide details of what changes you think should be made.

The methodology needs some flexibility. Services in villages are constantly changing and even larger villages tend to lose shops and other services. Many villages will never attract or maintain services due to the nature of the market economy and the mobility enjoyed now by most residents, a trend that cannot be reversed. As a result, even daily needs across the area are met by the market towns, given the wider choices than those available locally. Fortunately, the effects of these trends are now being offset by technological developments such as hybrid or electric vehicles and also by fibre broadband which is reducing both work and shopping trips. Where village services are available, and given the Local Plan emphasis on the need to retain these services, the plan should in turn acknowledge that development in smaller villages will also support services in nearby larger villages, as explained in the NPPF para 78. Perhaps a strict classification is not really needed? The presence of services within a village should not always be a key criterion for its classification as a large village, but possibly the size of the village should be more of a consideration whilst taking into account the capacity to deliver further housing development, particularly large sites. However, many large villages will have limited capacity for further growth and going forward there will increasingly be a need to allow small scale quality housing developments across all villages.

Under the current methodology, Folkingham should qualify as a Large Village as it has a shop, village hall, post office, church, and pub. The village of Aisby, where an application has recently been approved, is missing from the list of smaller villages.

### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	X
-----	--	----	--	--------	---

If so, please outline any suitable and deliverable proposals.

Is there any appetite to live in such garden villages? However, there might be an opportunity to develop such a village close to a market town and close to the main transport network but at the same time to ensure that adequate local services for daily needs are available which people could access on foot or by bicycle.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	X	No		Unsure	
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**If not, what evidence do you have to justify an alternative need and requirement?**

There is a need to build more houses, as demand far exceeds supply and prices are high. This is particularly true in villages as house prices have increased sharply in recent years. In the smaller 60 villages there has been a presumption against development for some 15 years and there is therefore pent up demand. The NPPF in para 68 also emphasises the importance of windfall sites in villages in meeting demand, as such sites are often built out far more quickly than larger developments (See Q7d).

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

**If not, please provide details and any alternative proposals.**

Yes, but not at the expense of suitable development elsewhere. Each application, irrespective of size, scale, or location, should be judged on its own merits.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	X	No		Unsure	
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**If not, please provide details and any alternative proposals.**

Yes, but there will be fewer opportunities given the scale of development in the past, particularly in Stamford due to its cultural and historical environment and the attractive landscape around the town. There will be less brownfield sites available and development will be on greenfield sites. Potential sites in Bourne and the Deepings may well be affected by climate change and the possibility of flooding.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

Yes, but many larger villages have already had a fair share of development in recent years causing new developments to intrude onto greenfield sites. There are not many brownfield sites or infill sites left. However, given the changes in human behaviour brought about by Covid 19 and the desire to move to more rural locations, there will be increased demand for housing in these villages.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

If SKDC is to meet its higher targets it will have to be bolder in its approach in the 60 other settlements, given the lack of development in these villages over the past 15 years. The NPPF para 68 emphasises the importance of windfall sites in meeting demand as they get built out more quickly than larger developments. The NPPF suggests 10% be allocated to these sites which for smaller villages would mean a much higher portion than the 4% currently allocated to them.

In the Forward to the Local Plan, it states that most growth in rural areas will be concentrated in the larger villages, with some development in smaller villages for “local people with community support”. This is somewhat ambiguous and does not show SKDC’s commitment to change. It is not clear what “local people “means; it risks being discriminatory and cannot be quantified. There are no material planning reasons as to why development should be restricted to “local people.” A development is either appropriate in its location or not, based on relevant planning policy and other material planning considerations in the interests of the proper planning of the area. Planning cannot reasonably restrict who can develop based on where they might come from. Furthermore, is planning expected to restrict occupancy of a dwelling to “local people” once development is complete? Also, the issue of upfront community support relates only to one of the two policies applying in smaller villages, namely SP4 (see Q3). This lack of clarity possibly accounts for the relatively slow uptake of the new policy for smaller villages, particularly given the absence of development over the past 15 years. While the website shows that some 40

applications have been submitted for smaller villages this year, this is only slightly above the expected average of 30 per year going forward.

Given the lack of development in the smaller villages in the past decade, there is now pent up demand which is reflected in high house prices. Demand will also increase now due to Covid 19, as it will across all the villages. The presumption in the possible changes to this new policy is that it might be less important going forward, when on the contrary, it seems that recent developments would point to strengthening the policy for smaller settlements.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
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Please provide details

There need to be target projections at the outset which reflect the policies in place but these will have to be adjusted in the light of actual opportunities for development in terms of land becoming available and developers wishing to proceed. Demand for housing particularly in Grantham and possibly some of the market towns may not be as strong going forward given the desire of many people to move out of an urban environment after Covid 19. How much does the Planning Authority need to attempt to control this when it will ultimately be controlled by market forces? This should not be a planning matter, particularly in relation to small scale development. A development proposal should be assessed on its planning merits.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	X
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	X	No		Unsure	
<b>If not, please provide details.</b>					
Completion of the long-awaited Grantham east-west bypass will be key to the success of the planned South Gateway Opportunity.					
<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
<b>Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?</b>					
Yes	X	No		Unsure	
<b>If not, please provide details.</b>					
Updating needed to take account of impact of Covid 19 on distribution of employment.					
Some thought needs to be given to Local Plan - Rural Economy para 2.91: it states that “outside the four main towns, agriculture is still the major source of employment.” This is incorrect and misleading given the technological changes in agriculture over the past forty years or so. During the 1980s and 1990s, many of South Kesteven’s villages have not only grown but have also changed due to an influx of people from all walks of life. In 2018, there were only 1000 employees in agriculture out of some 55,000-total employed in South Kesteven, or only 1.8%. There is already substantial diversification of employment in rural areas with many small, self-employed businesses, increasingly based on home working.					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
<b>Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?</b>					
Yes		No		Unsure	X
<b>If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.</b>					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	X	No		Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	X	No		Unsure	
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Please give details.

Higher energy performance standards should be encouraged as part of the welcome good design policy.

Nothing is mentioned here about the new policy SPD proposed for good design which is particularly relevant for windfall type developments.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
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Please give details

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**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Finalise the good design policy SPD as it is highly relevant to SP3 and SP4.

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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

This report is very general and as a result it is difficult to draw any conclusions as to the direction of planning policy in the district. Each of the main settlement groups in the hierarchy has its own constraints and challenges regarding further development. What emerges is that the three market towns are more sensitive to development than Grantham, particularly Stamford because of its cultural and historical environment. Also, the landscape in the Stamford area will limit growth in greenfield sites.

While there will be opportunities for sensitive designs in brownfield sites, there are not enough brownfield sites across the market towns to satisfy demand. Climate change and an increased risk of flooding will also affect Bourne and the Deepings. On the positive side, continued growth in the market towns will benefit from the required infrastructure support from housing developers. The report argues that there will be increased demand in the Larger Villages but points out that existing services in many of the villages are at capacity (schools, sewerage and water supply). As in other settlements there are few brownfield sites and greenfield land will be needed to meet demand. Increased demand in the larger villages can now be expected due to changes in human behaviour after Covid 19 and the desire to live in a more rural setting.

Regarding the 60 smaller villages, the report advocates a continuation of the piecemeal windfall approach with the disadvantage that development in these villages brings people who are reliant on car transport to the larger villages and market towns. The report fails to recognise that services in larger villages are also sustained by demand from the smaller surrounding villages, reflecting the essence of the market economy. This is as much about sustainability as the weak argument against development in smaller communities creating additional traffic. The report also makes no reference to on line shopping which has increased dramatically during Covid 19 and will continue to reduce car travel for daily needs.

Although some development is recognised as being important to maintain the vitality of smaller villages and support economic and local market activity, the report does not recognise that such locations are also attractive for home working, particularly as more and more villages now benefit from fibre optic broadband. The report also does not point out that there is strong demand in these villages with ever increasing house prices reflecting a shortage of supply as development has not been encouraged by the council for the past 15 years. Covid 19 is also likely to continue to increase demand in smaller villages as it will in the larger villages. While emphasising that many of these smaller villages are set in sensitive landscapes and historic environments, the report does argue that well sited development coupled with high quality design and layout can actually support cultural heritage assets and their settings.

Given these developments and the importance given by the NPPF to windfall sites, somewhat more emphasis on sensitive development in smaller villages could be argued rather than a strict piecemeal approach.

One final point regarding air quality in Grantham, the report misses the point that the single most important factor affecting air quality in the town would probably be the completion of the east-west bypass.

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0056

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		
First Name		
Last Name		
Organisation	Peakirk Parish Council	
Address	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 50px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div>	
Postcode	<div style="background-color: black; width: 50px; height: 15px;"></div>	
Telephone		
Email Address	<div style="background-color: black; width: 150px; height: 15px;"></div>	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23/11/2020

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**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes					
If not please provide details.					
YES					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
		No			
If not please provide details.					
NO. changes needed to meet climate emergency and Covid 19 recovery. Suggested – More specific information on sustainability required on urban extensions e.g. House building standards, working from home support.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
		No			
If not please provide details.					
<p>1.No. You should define Sustainable growth and provide tangible targets to be reached, both in owner occupied and rented accommodation. e.g support for the Government Greener Homes targets (Sept 2020) with Low carbon heating technology.</p> <p>2.No. You should aim to build a green economy based on local support jobs.</p> <p>3. Define sustainable.</p> <p>4. Yes</p> <p>5. Yes.</p> <p>6. OK</p> <p>7. OK</p> <p>8. Superfast broadband accessibility</p> <p>9 OK</p>					

10. OK

11. OK

12. Promote the Doubling Nature Objective followed by Cambridgeshire.

13. Too easy to avoid for developers. Must be central to any planning application.

14. As above.

15. As above.

The objectives should be changed to support the Zero Carbon target. Sustainability is too general a term. Conditions need to be more specific and based on actual targets.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes

If not please provide details.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes

If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes

If not, please provide details of what changes you think should be made.

Retain the existing Settlement Hierarchy.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes

If not, please provide details of what changes you think should be made.

Yes, the methodology is appropriate for this review.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

		No			
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If so, please outline any suitable and deliverable proposals.

No. Future development should conform to the existing methodology, which has been based on extensive research. The countryside should be protected from ad hoc additions. Some may be suggested in areas that will be on or near sea level by 2050 which would make them unsustainable and not in line with the Zero Carbon 2050 target

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes					
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If not, what evidence do you have to justify an alternative need and requirement?

Yes.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

Yes.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

Yes

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

Yes

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

				Unsure	
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If not, please provide details and any alternative proposals.

It may be acceptable to allocate housing development in smaller settlements that fulfil Zero Carbon criteria, with the agreement of the Parish Council.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes					
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Please provide details

Yes. Developers meeting Zero Carbon standards should be preferred to those not complying. Marketing of Low Carbon Homes could be supported by local government.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

		No			
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If yes, please provide details.

No

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes					
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If not, please provide details.

Yes

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes					
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If not, please provide details.

Yes, Village Hubs for home working should be supported.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

		No			
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

No. If the government are serious about meeting the legal binding target of Zero Carbon emissions by 2050 they will have to re-introduce the mandatory implementation of the Code For Sustainable Homes. This was launched in 2006 and in operation until 2010. Until 2015 the code was mandatory in England if it was a requirement of the Local Authority's Local Plan. This included safeguarding the environment and implementing measures for adapting to climate change. If the CFSH is reintroduced, even under these restricted terms, the Local Plan, which should set out the framework for future development on a 15-year horizon, would help South Kesteven meet its Zero Carbon target by 2050.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes					
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes					
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Please give details.

Yes. All non-residential property should meet the appropriate and agreed BREEAM standards.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

Viability is relative. If all developers have to meet the requirements, it should be part of the cost and profit calculations. Binding Viability figures should be submitted to the Planning Authority prior to any work starting on site.

#### 16. Proposal 12 – Need for Caravan Accommodation

##### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

		No			
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Please give details

No

#### 17. Proposal 13 – Parking Standards

##### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes					
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Please give details

Sensible parking standards play an important part in development proposals. Many villages have development with inadequate parking spaces allocated. Often the garage is counted as a space, although it is never used as such. This results in on-pavement parking in narrow residential streets leading to reduced, unsafe pedestrian access for families with children, disabled pedestrians and other users. All residential areas, especially in villages must have suitable realistic vehicle allocations. These need not necessarily be adjacent to the dwelling, but possibly in secure courtyard areas, away from pedestrians.

#### 18. Any other Comments

##### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Yes. Please consider more or alternative allocations for self-build serviced plots. These can often add to the character of especially rural areas and are very attractive to both local families and incoming residents. How far does the current Local Plan allocation meet the need of the Custom and Self Build Register?

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**Part C: Sustainability Appraisal Scoping Report**

<b>19. Comments about the Sustainability Appraisal Scoping Report</b>
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<b>Thank you for responding to this consultation.</b>
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**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form**

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	David	
Last Name	Shelton	
Organisation	Deepings Neighbourhood Plan Group	
Address		
Postcode		
Telephone		
Email Address		
<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>		
<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>		
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>		
<b>4. Please Sign and date this form</b>		
<b>Signature (please type for an electronic response)</b>		<b>Date</b>
		21.1.20

### Comments by the Neighbourhood Plan Team on 'Local Plan issues and options'

[DNP= Deepings Neighbourhood Plan , Submission Draft June 2020]

<b>SKDC questions</b>	<b>Neighbourhood planning team response</b>
<p><i>QUESTION 1a – <u>The Vision</u> Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.</i></p>	<p>No. We do not agree.</p> <p>We suggest the relevant part of the Vision (for The Deepings) should be based on that presented in the Deepings Neighbourhood Plan (DNP) once adopted.</p>
<p><i>QUESTION 1b – <u>The Vision</u>. Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District? If not please provide details.</i></p>	<p>No. It does not present a sufficient vision, as it is not reflecting new dynamics bearing down on the Deepings.</p> <p>By way of example, on economic matters, the 2020 change in the national <i>Use Classes Order</i> (that replaces shops with a new broader business use class) may shift retail investment focus towards present industrial estates. In The Deepings these areas have developable land, premises are available, and road access is good. Outside previous planning controls, the <i>Northfields Industrial Estate</i>, more than ever, might grow into a service area with more retail activity.</p> <p>Whilst that change will have to be accommodated (it is not now a policy choice), the present historic town centre is an identifiable and symbolic centre. The Town centre is a central part of the overall character that will need support to function as the primary key business centre for the town. This support may, in development management terms, be simply be to resist residential use on the ground floor of present commercial premises. This simple action will preserve the stock of business floorspace. This is the central purpose of Policy DNP 5 (Town Centre) of the DNP as well as DNP7 (Local Centres).</p> <p>We suggest you insert explicit reference to this new dynamic as it may help to drive new policy formulation, ad amendment to the present SKLP Policy DEP2 Market Deeping Town Centre Policy.</p>
<p><i>QUESTION 2 – <u>Objectives</u>. Do you agree that the Objectives should remain the same for the new plan? If not please provide details.</i></p>	<p>Unsure. SKDC is asked to check consistency with Submission Draft DNP objectives.</p>

<p><i>QUESTION 3 – Policies not proposed to be changed significantly</i></p> <p><i>Q4 – Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.</i></p>	<p>No. We do not agree with the list where it departs from the provisions of the DNP, and we ask that the following SKLP policies are re-examined. If the strategic SKLP policy remains , explicit references to the difference between the SKLP and DNP may need to be cross referenced for ease of interpretation.</p> <p><b><u>SKLP Policy SP4 – development on the edge of settlements.</u></b> This is a permissive and unduly ‘generous’ policy whereas DNP2.2a limits new sites on the edge to no more than 0.5ha (10 houses or so). Any sites larger than that will need to be defend by specific allocations</p> <p><b><u>SKLP Policy E4- Protection of existing employment.</u></b> This does not recognise the existence of a significant employment area at <i>Hards Lane</i> . See DNP 4.4 .</p> <p><b><u>SKLP Policy OS1 - open space.</u></b></p> <p>a. The policy is based on an inadequate and dated assessment of open space need across the district. There is a deficiency of open space in the Deepings as measured by the Council’s own standards. This is referenced in the <i>DNP, Appendix B. Page 31 Local Green Spaces Justification and Maps (Sub-Appendix 1 : Assessment of Local Green spaces)</i></p> <p>b. Consequently each major housing development needs to offer far more than seems to be captured by this policy. As recent evidence, one poor development management outcome is the inadequate open space provision for land west of Linchfield, Lindum/Vistry Developments – refs 17/2466, 19/0443 and undecided 20/01235).</p> <p>c. The policy is difficult to apply to individual housing sites as it contains a mix of on-site and offsite provision. It requires developers to provide an assessment of provision outside the development site (see the policy’s catchment area provisions) and will also include land that is not useable for passive or active recreation (eg ‘natural green space’ that could be a noise bund or a drainage basin).</p> <p>d. A more transparent and readily secured standard should be sought (e.g. percentage of each site area given over to open space, and the exclusion of landscape structural planting or unusable drainage basins from the count). The policy might for example clarify that on-site open space needs to be <u>useable</u> (by not including unusable deep and steep sided flood-risk attenuation basins).</p> <p>e. Additionally, the plan should provide a worked example that would help guide both developers and local people apply and understand the standards consistently.</p> <p><b><u>SKLP Policy DEP2 – Market Deeping Town Centre .</u></b></p> <p>Comments above in question 1b apply here.</p>
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	<p>a. This policy does not recognise the change in the use classes order that absorbs shops into a more general business use class that includes non-retail activity. This will impact on the town centre requiring considerable support to retain the Centre has the functional and symbolic core of the town.</p> <p>b. Changes to this policy might reflect the terms of policy DNP 5 that promotes an expanded town centre and, importantly, discourages residential use of ground floor premises in the centre.</p>
<p><i>QUESTION 4 – Plan Period Do you agree with the proposed plan period up to 2041? If not please provide details</i></p>	<p><i>No comment</i></p>
<p><i>QUESTION 5a – Settlement Hierarchy Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.</i></p>	<p><i>No comment</i></p>
<p><i>QUESTION 5b – Settlement Hierarchy Methodology Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review? If not, please provide details of what changes you think should be made</i></p>	<p><i>No comment</i></p>
<p><i>QUESTION 6 – Housing Need and Requirement Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?</i></p>	<p><i>No comment</i></p>

## Deepings Neighbourhood Plan Team, Response to Local Plan issues and options Oct 2020.

<p><i>QUESTION 7b – Stamford, Bourne and The Deepings Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth? If not, please provide details and any alternative proposals.</i></p>	<p>Yes - we agree. The Deepings is an appropriate centre for housing growth provided this is met by supporting infrastructure growth including new recreational open space above and beyond that to be provided by individual developers.</p> <p>We have had a lot of planned growth but delivery of that growth has not yet occurred. The growth will need time for local infrastructure to catch up.</p>
<p><i>QUESTION 7e – Consideration of the Market and Deliverability* Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?</i></p>	<p>Unsure. This is one of many considerations to consider in expanding a town. That is not the only consideration. Sometimes the market will continue to deliver housing even if supporting infrastructure is not there to match such growth.</p>
<p><i>QUESTION 8 – Gypsy and Traveller and Travelling Showpeople Accommodation Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations? If yes, please provide details.</i></p>	<p>No comment.</p>
<p><i>QUESTION 9a – Strategic Employment Allocations Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable? If not, please provide details.</i></p>	<p>No comment</p>
<p><i>QUESTION 9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</i></p>	<p>No comment</p>

<p><i>QUESTION 10, 11 – Climate Change Policies.</i>  <i>Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change? If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.</i></p>	<p>Unsure.</p> <p>We</p> <ul style="list-style-type: none"> <li>• support further work being done on sustainable travel options. See DNP16.</li> <li>• recognise the need for local action and look forward to guidance from SKDC.</li> </ul>
<p><i>QUESTION 12 – Need for Caravan Accommodation. Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.</i></p>	<p>No comment</p>
<p><i>QUESTION 13 – Parking Standard. s Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.</i></p>	<p>Yes, we agree that standards should be applied in The Deepings. Two other Lincolnshire districts have formally adopted parking standards - Boston, and South Holland Councils.</p> <p>Parking standards are included at DNP 16.8, and at DNP Appendix E. See also DNP H1- Background Document - Residential Parking &amp; Garage Standards 12.02.2020. (For clarity, space standards for garages quoted there should be internal not external dimensions. )</p> <p>The amended SKLP, for clarity and ease of interpretation, should recognises these local standards.</p> <p>We recommend:</p> <ul style="list-style-type: none"> <li>• the development of new parking standards for the district as a whole</li> <li>• provision being made for electric vehicle charging points</li> </ul>
<p><i>QUESTION 14 – Any Other Comments Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?</i></p>	<p>New Use classes order and its implications.</p>

9 November 2020  
201116 Issues and Options - Representations Carlby



Planning Policy  
South Kesteven District Council  
Council Offices  
St Peters Hill  
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Lincolnshire  
NG31 6PZ

Rob Moore



### By Email Only

Dear Sirs,

#### **Land at Grange Farm, Carlby South Kesteven District Council Local Plan Review (2041) Issues and Options Document**

This letter is sent in response to the South Kesteven District Council Local Plan Review- Issues and Options Consultation. Savills (UK) Ltd have been commissioned by the landowners of the above site to make representations to the Issues and Options Consultation with particular regard to their land at Grange Farm, Carlby. The comments enclosed are therefore made in the context of the Land at Grange Farm being a deliverable and developable site to accommodate up to 40 residential dwellings, employment space for small and medium enterprise and contribute toward the aims of the Carlby Parish Neighbourhood Development Plan.

We understand the Issues and Options Consultation is being undertaken in line with Adopted Local Plan Policy M1 which requires the review of the Plan prior to 2023, as well as the inspectors recommendation. Given the evolving housing land supply position in South Kesteven, we are fully supportive of this Local Plan review which is required to bring the Local Plan in line with the Governments aspirations to deliver 300,000 dwellings per annum.

Specific commentary has been provided below in response to the questions of relevance outlined within the Issues and Options Document. A red line plan and Call for Sites Form is also enclosed to demonstrate that the Land at Grange Farm can be developed to deliver up to 40 dwellings and small scale incubator employment units for small and medium enterprise to meet the aims of local businesses.

#### **Commentary on the Issues and Options Document**

##### ***Question 3- Policies not proposed to be changed significantly***

##### ***Q4- Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.***

Proposal 3 outlines the policies not proposed to be changed significantly through the Local Plan review. Policy SP4 'Development on the Edge of Settlements' is included in the list of policies to be retained through the Local Plan. We do not consider that this approach aligns with the NPPF, particularly with regard to the support offered for rural development outlined within the NPPF.

Local Plan Policy SP4 must be reviewed in order to align with the National planning policy position with particular regard to the support offered to rural development in smaller settlements. Specifically, growth must



be supported in those settlements assessed as smaller settlements which are located in close proximity to one another given the potential for small scale and appropriate development to contribute towards the sustainability and vitality of rural communities when considered as a cluster.

The NPPF (2019) clearly states that where smaller rural settlements are located within close proximity to one another, growth should be allowed in recognition of the potential opportunities for these small villages to grow and thrive, enhancing their vitality. This approach is most relevant in the case of Carlby. Development in Carlby has clear potential to support services within Carlby, Essendine, Manthorpe and Witham on the Hill.

An overriding aim outlined within the National Planning Policy Framework (NPPF), is to ensure that Plans are 'prepared with the objective of contributing to the achievement of sustainable development', and are prepared in a way that is 'aspirational but deliverable'.

It can also be considered that the approach taken within Policy SP4 as existing does not seek to achieve the objective of contributing to the achievement of sustainable development, given that land within Smaller Settlements, which could make a valuable contribution to the vitality of smaller settlements as well as housing delivery in the District, is required to meet a significant number of criteria in order to align with policy, prior to development being permitted.

Policy SP4 should be reviewed to minimise the criteria a site needs to meet in order to ensure that smaller villages can deliver much needed development given they are often still a sustainable location for growth when considered as a cluster.

Whilst Smaller Villages have not been specifically afforded growth through the Local Plan, the NPPF is clear that in rural areas, planning policies should be responsive to local needs and identify opportunities for villages to grow and thrive, especially where this will support local services. The Framework also recognises that where there are groups of smaller settlements, development in one village may support services in a village nearby.

We have previously discussed the potential for growth at Grange Farm with the Carlby Neighbourhood Plan Group. The Group were resistant to any growth on this edge of settlement site. It is of fundamental importance that the strategies of both the Local Plan and Neighbourhood Plan work in tandem to promote growth in a sustainable and managed way and not restrict growth. It is important that there is sufficient flexibility built into the Local Plan to ensure that local circumstances and market requirements can be reflected in the location and quantum of development, and the plan remains up to date.

This approach is supported through Paragraph 11 of the NPPF:

*'Plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexible to adapt to rapid change'*

Incorporating flexibility also ensures that development will be market led. In addition, any deliverability issues with allocated sites which results in fewer or no development being brought forward can be compensated for on sites elsewhere, ensuring development still meets the identified need of the settlement.

It is also important to recognise that smaller settlements such as Carlby often suffer from affordability issues, meaning that younger people and young families are forced to leave the area. Development at the Land at Grange Farm would allow a development of sufficient quantum to deliver affordable dwellings in a location where it is much needed, whilst also adding to the housing offering in the area.

*Recommendation: Review Local Plan Policy SP4 to ensure sufficient flexibility for edge of settlement sites within smaller settlements, which will support rural communities and services and promote vitality.*

### **Question 5a- Settlement Hierarchy**

***Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not please provide details of what changes you think should be made.***

We agree that the Settlement Hierarchy outlined within the adopted Local Plan should be retained through the Local Plan Review. The distribution of dwellings across the District at a level proportionate to the level of shops and services in each settlement. This will ensure that any new development is sustainably located, whilst also maintaining the vitality of smaller settlements such as Larger Villages and Smaller Villages.

Within the adopted Core Strategy, Carlby is identified as a ‘Smaller Village’, determined by the level of services available within the Village. Within Smaller Villages, proposals for development will be supported where they align with the criteria outlined within Local Plan Policies SP3 and SP4. Whilst we agree with the classification of Carlby as a Small Village, we consider the criteria outlined specifically within policy SP4 need to be reviewed in order to align with the NPPF. Additional comments on this have been outlined in response to question 3.

Smaller Villages such as Carlby have a valuable contribution to make to the housing supply of South Kesteven and this should be formalised and encouraged through the Local Plan.

***QUESTION 6 – Housing Need and Requirement***

***Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?***

This Local Plan review is being undertaken, in part, due to the adopted housing target of 650 dwellings per annum being based upon out of date assessments of housing need and the introduction of the Standard Method for calculating housing need in 2018, which has increased the housing requirement of South Kesteven to 732 dwellings per annum. The NPPF expects strategic policy making authorities to follow the standard method for calculating local housing need.

Changes to the standard method for assessing local housing need were released through the ‘Changes to the Current Planning System’ consultation in 2020. These changes use the most recent data and seek to achieve a better distribution of homes according to need and support the Governments ambition to support 300,000 homes a year. Figures referred to as ‘Standard Method 2’ were the result of these amendments.

Utilising the calculations within Standard Method 2, South Kesteven are required to deliver a minimum of 839 dwellings per annum. Whilst Standard Method 2 is currently in consultation stage, we believe this demonstrates a clear direction of travel, with the identified housing requirement of the District likely to increase. This should be considered and planned for at this early stage of the Local Plan review to ensure robustness.

Given the early stage of this review, South Kesteven should seek to ensure that their process is robust to avoid an early review. We strongly believe that the housing need for the District should therefore be increased to 839 dwellings as a minimum.

The NPPF requires Local Planning Authorities to be aspirational in their plan making. NPPG is clear that the Standard Method identifies a minimum housing need figure. In combination with the 2019 Housing Delivery Test result, which outlined a historic under-delivery in South Kesteven and subsequently recommended a buffer be applied to the housing requirement of the district, the Local Planning Authority must take this opportunity to plan positively and ambitiously with the aim of meeting the housing requirement of the district as a minimum and making up for historic under-delivery.

*Recommendation: Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.*

***QUESTION 7d – Other Settlements***

***Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through 'windfalls'? If not, please provide details and any alternative proposals.***

The Issues and Options consultation paper outlines the proposed spatial distribution of development across South Kesteven in the 23 year plan period, with no set percentage being directed to Smaller Villages. Instead, the Local Plan is seeking to rely on existing commitments and windfalls for development in these locations. We do not consider that this represents aspirational growth or sustainable development.

We have outlined within these representations the valuable contribution which can be made by Smaller villages and rural settlements. Aside from the total capacity outlined in the table, which should be increased to achieve 839 dwellings per annum in line with our comments above, we suggest the LPA demonstrate aspirational planning by distributing a suitable and proportional level of growth toward Smaller Villages and other settlements.

The NPPF acknowledges that development is required in rural locations such as villages to retain and maximise the vitality of the settlement. Carlby is identified as a Smaller Village in the Settlement Hierarchy but benefits from proximity to a number of other rural settlements. The distribution of dwellings to Smaller Village locations such as Carlby will have the benefit of improving the vitality of the Village whilst also ensuring the vitality of those communities within close proximity, including the small shops and services on offer.

It is considered to be particularly important in Smaller Village locations, that LPAs allocate a range of smaller sites, to ensure that development is encouraged and meets the communities requirements as well as those of the market.

In addition, Paragraph 68 of the NPPF recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area. This is considered to be particularly relevant in the short term, as such small and medium sites can often be developed and delivered relatively quickly. In recognition of this important contribution, smaller settlements are considered to be particularly appropriate for accommodating levels of growth which remain in keeping with the size of the relevant settlement and its surrounding services.

Finally, given the historic under-delivery in the District, which has been highlighted by the Housing Delivery Test, South Kesteven have created an Action Plan to promote development through the District. One action within the Action Plan is to take a more pragmatic and positive view with respect to applications on windfall sites within Grantham and the wider district. This suggests that the reliance on windfall sites has been ineffective previously in small villages such as Carlby. Therefore growth in these locations should be planned for decisively through the use of positive planning policies and appropriate allocations such as the Land at Grange Farm.

Given the increased housing need across South Kesteven, the sensitive allocation for growth in Smaller Villages presents an opportunity for the Local Planning Authority to boost the housing supply in a way that meets the requirements of the market, whilst achieving the aims of sustainable development.

*Recommendation: Plan decisively, supporting growth in smaller villages through appropriate allocations in these locations.*

### **Land at Grange Farm, Carlby**

These representations have been submitted with specific consideration to land at Grange Farm, Carlby. The site is considered suitable for residential development and could provide a meaningful contribution to the housing need for South Kesteven. This representation seeks to demonstrate that the site constitutes sustainable development and aligns with the adopted Local Plan for South Kesteven and the NPPF and should be allocated to accommodate up to 40 dwellings.

The Land at Grange Farm, Carlby measures circa 2.68 ha (6.64 acres). It is located directly adjacent to the settlement of Carlby and is bound by residential development to the south west.

The site is located adjacent to the existing built form of the settlement and provides the opportunity to deliver a sensitive residential development in a sustainable location, with no adverse impacts to the core shape and form of the settlement.

The site is located within Flood Zone 1 (Lowest Risk of Flooding). There are no statutory environmental designations relating to the site. A full range of technical assessments will be undertaken to inform the site allocation as the process progresses.

The site is a ten minute walk (0.4 miles) from the nearby services which include Churches and playing fields. A bus stop is located less than 50m from the site which provides sustainable transport connections by bus to Bourne, Peterborough, Stamford and Tallington.

It is envisaged that a sensitive development of up to 40 dwellings could be located on site, the site could also be utilised to provide a small amount of incubator/ workspace units to accommodate local SMEs, which would be of benefit to the community in this location.

The site is located circa 159 metres from the nearest heritage assets:

- Grade II Listed Grange Farmhouse
- Grade II Listed Crew Yard, Beast Houses and Barn at Grange Farm

It is envisaged that existing mature planting fronting the A6121 as well as sensitive masterplanning, would afford sufficient separation from the heritage assets in this location.

Within Carlby, much of the residential development to the east of the settlement adjacent to the land at Grange Farm are later additions dating 1990-2004. The development of land at Grange Farm would continue the direction of growth within the village to the north east. Any development on the Land at Grange Farm can be undertaken to be sensitive to surrounding development and the character of the village.

Carlby Neighbourhood Plan was adopted in 2019 and sets out the principles for growth in Carlby. The Neighbourhood plan does not allow for development outside of the existing curtilage of the settlement, including backland development. Infill development is allowed only where it does not affect stone houses, stone walls or green space. Any development must not detract from St Stephens Church. In all, the Neighbourhood Plan is extremely resistant to any new development in the settlement and does not meet the aims of the NPPF which requires Neighbourhood Plans to support the delivery of strategic Local Plan Policies or NPPG, which expects Neighbourhood Plans to meet, and exceed where possible, their housing requirement. Clearly, South Kesteven need to demonstrate improved housing delivery and an increase in deliverable housing sites. The Neighbourhood Plan must seek to support this aim by allowing sensitive growth in Carlby and the Local Planning Authority must lead decisively to deliver much needed growth across the district, ensuring that Policy SP4 'Edge of Settlement development' is not overly restricted by anti-growth Neighbourhood Plans.

The landowner of the Land at Grange Farm has undertaken initial consultation with the Parish Council, these discussions are ongoing in order to develop public support for the development of the site, meeting the aims of Policy SP4.

In all, it is envisaged that the site could be designed to be sensitive to settlement, with a high quality landscaping scheme to buffer the development from the heritage assets and adjacent dwellings. There is also the opportunity to locate small employment workshops to accommodate local enterprise.

In summary, the Land at Grange Farm presents an excellent opportunity as a deliverable residential site in a sustainable location. The development of the site to accommodate up to 40 dwellings would allow the delivery of much needed housing, including affordable housing, whilst rounding off the existing built form of Carlby



Village. An early assessment has identified that the site is relatively unconstrained, and could make an important and proportionate contribution to the housing requirements of the District and the village, whilst taking the adjacent heritage assets into full regard. The potential to deliver a high quality design on the site, which could include some small scale, employment units for small and medium local enterprise would also meet the requirements of economic sustainability, enhancing the vitality of the settlement. Therefore, we respectfully request that the comments enclosed within these representations are taken into full regard, and the Land at Grange Farm, Carlby is allocated in the emerging Local Plan, as a deliverable and developable residential site.

Yours sincerely



Rob Moore  
Associate Director

9 November 2020  
201116 Issues and Options - Representations



Planning Policy  
South Kesteven District Council  
Council Offices  
St Peters Hill  
Grantham  
Lincolnshire  
NG31 6PZ

Rob Moore



### By Email Only

Dear Sirs,

### Land at Old Post Lane, Colsterworth South Kesteven District Council Local Plan Review (2041) Issues and Options Document

This letter is sent in response to the South Kesteven District Council Local Plan Review- Issues and Options Consultation. Savills (UK) Ltd have been commissioned by the landowners of the above site to make representations to the Issues and Options Consultation with particular regard to their land at Old Post Lane, Colsterworth. The comments enclosed are therefore made in the context of the Land at Old Post Lane being a deliverable and developable site to accommodate up to 12 residential dwellings and contribute toward the aims of the Colsterworth and District Parish Council.

We understand the Issues and Options Consultation is being undertaken in line with Adopted Local Plan Policy M1 which requires the review of the Plan prior to 2023, as well as the inspectors recommendation. Given the evolving housing land supply position in South Kesteven, we are fully supportive of this Local Plan review which is required to bring the Local Plan in line with the Governments aspirations to deliver 300,000 dwellings per annum.

Specific commentary has been provided below in response to the questions of relevance outlined within the Issues and Options Document. An indicative site plan is enclosed to demonstrate that the Land at Old Post Lane can be developed to deliver 10-12 dwellings whilst also providing a café and pond to meet the aims of the Neighbourhood Plan for Colsterworth and the Colsterworth and District Parish Council.

### Commentary on the Issues and Options Document

#### **Question 5a- Settlement Hierarchy**

***Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not please provide details of what changes you think should be made.***

We agree that the Settlement Hierarchy outlined within the adopted Local Plan should be retained through the Local Plan Review. The distribution of dwellings across the District at a level proportionate to the level of shops and services in each settlement. This will ensure that any new development is sustainably located, whilst also maintaining the vitality of smaller settlements such as Larger Villages and Smaller Villages.

Within the adopted core strategy, Colsterworth is identified as a 'Larger Village'. Within Larger Villages, suitable sites are allocated for residential development to contribute to the total supply of the District. This approach



should be carried forward through the Local Plan Review and additional sites should be identified to account for the extended plan period and additional housing requirement as outlined below.

Larger Villages such as Colsterworth have a valuable contribution to make to the housing supply of South Kesteven and this should be formalised and encouraged through the Local Plan.

**Question 5b- Settlement Hierarchy Methodology**

***Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review? If not please provide details of what changes you think should be made.***

The approach outlined within the ‘South Kesteven Local Plan 2011- 2036 Settlement Hierarchy Review’ must be reviewed as part of the Local Plan Review in order to align with the National Planning policy position with particular regard to the method of identifying Larger Settlements. Specifically, those settlements assessed as smaller settlements which are within 400m of a larger settlement should be included within the Larger Settlement classification as had previously been the case within the Local Service Centre element of the settlement hierarchy within the previous Core Strategy.

The NPPF (2019) clearly states that where smaller rural settlements are located within close proximity to one other, growth should be allowed in recognition of the potential opportunities for these small villages to grow and thrive, enhancing their vitality. This approach is most relevant in the case of Colsterworth and Woolsthorpe by Colsterworth which are located less than 55m from one another at their closest point.

Colsterworth and Woolsthorpe by Colsterworth should also be identified within the settlement hierarchy as one larger settlement given that Woolsthorpe is a ten minute walk from the Co-Op shop in Colsterworth. This approach is taken in the Settlement Hierarchy Update to identify a smaller village, and so it would be appropriate for the same approach to be taken in assessing which smaller villages should be included within the Larger Villages tier of the hierarchy.

*Recommendation: Include ‘Colsterworth and Woolsthorpe by Colsterworth’ as a larger settlement within the settlement hierarchy in recognition of the interconnectivity of the services in this location.*

**QUESTION 6 – Housing Need and Requirement**

***Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?***

This Local Plan review is being undertaken, in part, due to the adopted housing target of 650 dwellings per annum being based upon out of date assessments of housing need and the introduction of the Standard Method for calculating housing need in 2018, which has increased the housing requirement of South Kesteven to 732 dwellings per annum. The NPPF expects strategic policy making authorities to follow the standard method for calculating local housing need.

Changes to the standard method for assessing local housing need were released through the ‘Changes to the Current Planning System’ consultation in 2020. These changes use the most recent data and seek to achieve a better distribution of homes according to need and support the Governments ambition to support 300,000 homes a year. Figures referred to as ‘Standard Method 2’ were the result of these amendments.

Utilising the calculations within Standard Method 2, South Kesteven are required to deliver a minimum of 839 dwellings per annum. Whilst Standard Method 2 is currently in consultation stage, we believe this demonstrates a clear direction of travel, with the identified housing requirement of the District likely to increase. This should be considered and planned for at this early stage of the Local Plan review to ensure robustness.

Given the early stage of this review, South Kesteven should seek to ensure that their process is robust to avoid an early review. We strongly believe that the housing need for the District should therefore be increased to 839 dwellings as a minimum.

The NPPF requires Local Planning Authorities to be aspirational in their plan making. NPPG is clear that the Standard Method identifies a minimum housing need figure. In combination with the 2019 Housing Delivery Test result, which outlined a historic under-delivery in South Kesteven and subsequently recommended a buffer be applied to the housing requirement of the district, the Local Planning Authority must take this opportunity to plan positively and ambitiously with the aim of meeting the housing requirement of the district as a minimum and making up for historic under-delivery.

*Recommendation: Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.*

### **QUESTION 7c – Larger Villages**

***Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities? If not, please provide details and any alternative proposals.***

The Issues and Options consultation paper outlines the proposed spatial distribution of development across South Kesteven in the 23 year plan period, with 8-10% being directed to Large Villages. Aside from the total capacity outlined in the table, which should be increased to achieve 839 dwellings per annum in line with our comments above, we support the continued distribution of growth towards Large Villages.

The NPPF acknowledges that development is required in rural locations such as villages to retain and maximise the vitality of the settlement. Colsterworth is identified as a Large Village in the Settlement Hierarchy and benefits from a number of shops, a pub, a church, tourist accommodation, doctors surgery and primary school. The continued distribution of dwellings to Large Village locations such as Colsterworth will have the benefit of improving the vitality of the Village whilst also ensuring the development is situated within close proximity to these existing shops and services on offer.

It is considered to be particularly important in Large Village locations, that LPAs allocate a range of sites in terms of both size and location, to ensure that any development which comes forward is sufficiently varied to meet market requirements.

In addition, Paragraph 68 of the NPPF recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area. This is considered to be particularly relevant in the short term, as such small and medium sites can often be developed and delivered relatively quickly without the need for significant infrastructure investment.

In recognition of this important contribution, Large Service Centres are considered to be particularly appropriate for accommodating levels of growth which remain in keeping with the size of the relevant settlement and its services.

Given the increased housing need across South Kesteven, the continued direction of growth to Large Villages presents an opportunity for the Local Planning authority to boost the housing supply in a way that meets the requirements of the market, whilst achieving the aims of sustainable development.

### **Land at Old Post Lane, Colsterworth**

These representations have been submitted with specific consideration to land at Old Post Lane, Colsterworth. The site is considered suitable for residential development and could provide a meaningful contribution to the housing need for South Kesteven. This representation seeks to demonstrate that the site constitutes

sustainable development and aligns with the adopted Local Plan for South Kesteven and the NPPF and should be allocated to accommodate up to 12 dwellings.

### Site and Context

The Land at Old Post Lane, Colsterworth measures circa 1.3ha (3.95 acres). It is located within the settlement of Colsterworth and is bound by residential development to the north and east. Further residential development extends past the fields which bound the site to the south and west.

The site is located adjacent to the existing built form of the settlement and provides the opportunity to deliver a sensitive residential development in a sustainable location, with no adverse impacts to the core shape and form of the settlement.

The site is a ten minute walk (0.5 miles) from the local store and benefits from excellent sustainable transport connections by the 28 bus which provides regular services to Grantham and South Witham.

### Statutory Designations and Constraints

The site is located within Flood Zone 1 (Lowest Risk of Flooding). There are no statutory environmental designations relating to the site. A full range of technical assessments will be undertaken to inform the site allocation as the process progresses.

The site is not allocated within any green space designations as per the adopted Local and Neighbourhood Plans.

The site is located circa 115 metres from The Woolsthorpe by Colsterworth Conservation Area and a cluster of five Listed Buildings which comprise Woolsthorpe Manor:

- Grade I Listed Woolsthorpe Manor House
- Grade II Listed Stables and Wagon Hovel at Woolsthorpe Manor
- Grade II Listed Cartshed at Woolsthorpe Manor
- Grade II Listed Barn at Woolsthorpe Manor
- Grade II Listed Stables at Woolsthorpe Manor

### Proposal

It is envisaged that a sensitive development of up to 12 dwellings could be located on site, the site could also be utilised to meet the aims of the Neighbourhood Plan forum by providing a pond and visitor centre/ café, which would be of benefit to the community in this location.

Woolsthorpe Manor is significant given it is the birthplace of Issac Newton. The illustrative site plan enclosed within this submission demonstrates how a sensitive scheme could be brought forward, locating development away from the heritage assets so as not to impact their setting and providing a significant buffer.

The site plan also outlines how a café could be developed on site, in line with the objectives of the Neighbourhood Plan. The café would also support the tourism to Woolsthorpe Manor. It is envisaged that any development proposals submitted in relation to the site would be accompanied and informed by a full heritage assessment to ensure any impact of the proposals on the setting of the Listed Buildings would be minimised.

The enclosed illustrative plan demonstrated how the site could be designed to be sensitive to the heritage asset and its setting. There is also the opportunity to locate a café and a pond on site to meet the aims of the Parish Council and the community.

### Summary



In summary, the Land at Old Post Lane presents an excellent opportunity as a deliverable residential site in a sustainable location. An early assessment has identified that the site is relatively unconstrained and presents opportunities to deliver a sensitive scheme of up to 12 dwellings, making an important and proportionate contribution to the housing requirements of the District and the village, whilst taking the adjacent heritage assets into full regard. Therefore, we respectfully request that the comments enclosed within these representations are taken into full regard, and the Land at Old Post Lane is allocated in the emerging Local Plan, as a deliverable and developable residential site.

Yours sincerely



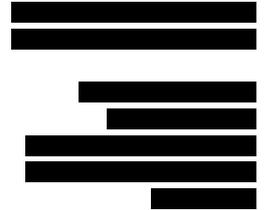
Rob Moore  
Associate Director

17 November 2020



Planning Policy  
South Kesteven District Council  
Council Offices  
St Peters Hill  
Grantham  
Lincolnshire  
NG31 6PZ

Rob Moore



**By Email Only**

Dear Sirs,

**Land west of Ropsley, Grantham  
South Kesteven District Council Local Plan Review (2041) Issues and Options Document**

This letter is sent in response to the South Kesteven District Council Local Plan Review- Issues and Options Consultation. Savills (UK) Ltd have been commissioned by the landowners of the above site to make representations to the Issues and Options Consultation with particular regard to their land at west of Ropsley, Grantham.

The comments enclosed are therefore made in the context of the Land to the west of Ropsley, Grantham being a deliverable and developable site to accommodate up to 30 residential dwellings and contribute toward the aims of the emerging Ropsley and District Neighbourhood Development Plan.

We understand the Issues and Options Consultation is being undertaken in line with Adopted Local Plan Policy M1 which requires the review of the Plan prior to 2023, as well as the inspectors recommendation. Given the evolving housing land supply position in South Kesteven, we are fully supportive of this Local Plan review which is required to bring the Local Plan in line with the Governments aspirations to deliver 300,000 dwellings per annum.

Specific commentary has been provided below in response to the questions of relevance outlined within the Issues and Options Document. A red line plan and Call for Sites form is also enclosed to demonstrate that the Land west of Ropsley can be developed to deliver up to 30 dwellings.

**Commentary on the Issues and Options Document**

***Question 3- Policies not proposed to be changed significantly***

***Q4- Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.***

Proposal 3 outlines the policies not proposed to be changed significantly through the Local Plan review. Policy SP4 'Development on the Edge of Settlements' is included in the list of policies to be retained through the Local Plan. We do not consider that this approach aligns with the NPPF, particularly with regard to the support offered for rural development outlined within the NPPF.



Local Plan Policy SP4 must be reviewed in order to align with the National Planning policy position with particular regard to the support offered to rural development in smaller settlements. Specifically, growth must be supported in those areas assessed as smaller settlements which are located in close proximity to one another given the potential for small scale and appropriate development to contribute towards the sustainability and vitality of rural communities when considered as a cluster.

The NPPF (2019) clearly states that where smaller rural settlements are located within close proximity to one other, growth should be allowed in recognition of the potential opportunities for these small villages to grow as well as the proximity to significant shops and services in Grantham.

An overriding aim outlined within the National Planning Policy Framework (NPPF), is to ensure that Plans are 'prepared with the objective of contributing to the achievement of sustainable development', and are prepared in a way that is 'aspirational but deliverable'.

It can also be considered that the approach taken within Policy SP4 as existing does not seek to achieve the objective of contributing to the achievement of sustainable development, given that land within Smaller Settlements, which could make a valuable contribution to the vitality of smaller settlements as well as housing delivery in the District, is required to meet a significant number of criteria in order to align with policy, prior to development being permitted.

Policy SP4 should be reviewed to minimise the criteria a site needs to meet in order to ensure that smaller villages can deliver much needed development given they are often still a sustainable location for growth when considered as a cluster.

Whilst Smaller Villages have not been specifically afforded growth through the Local Plan, the NPPF is clear that in rural areas, planning policies should be responsive to local needs and identify opportunities for villages to grow and thrive, especially where this will support local services. The Framework also recognises that where there are groups of smaller settlements, development in one village may support services in a village nearby.

It is important that there is sufficient flexibility built into the Local Plan to ensure that local circumstances and market requirements can be reflected in the location and quantum of development, and the plan remains up to date.

This approach is supported through Paragraph 11 of the NPPF:

*'Plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexible to adapt to rapid change'*

Incorporating flexibility also ensures that development will be market led. In addition, any deliverability issues with allocated sites which results in fewer or no development being brought forward can be compensated for on sites elsewhere, ensuring development still meets the identified need of the settlement.

It is also important to recognise that smaller settlements such as Ropsley often suffer from affordability issues, meaning that younger people and young families are forced to leave the area. Future development of the Land west of Ropsley would allow needs to be met in the longer term, whilst also allowing the delivery of more affordable homes in a location where it is much needed, whilst also adding to the housing offering in the area.

*Recommendation: Review Local Plan Policy SP4 to ensure sufficient flexibility for edge of settlement sites within smaller settlements, which will support rural communities and services and promote vitality.*

#### **QUESTION 6 – Housing Need and Requirement**

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?**

This Local Plan review is being undertaken, in part, due to the adopted housing target of 650 dwellings per annum being based upon out of date assessments of housing need and the introduction of the Standard Method for calculating housing need in 2018, which has increased the housing requirement of South Kesteven to 732 dwellings per annum. The NPPF expects strategic policy making authorities to follow the standard method for calculating local housing need.

Changes to the standard method for assessing local housing need were released through the 'Changes to the Current Planning System' consultation in 2020. These changes use the most recent data and seek to achieve a better distribution of homes according to need and support the Government's ambition to support 300,000 homes a year. Figures referred to as 'Standard Method 2' were the result of these amendments.

Utilising the calculations within Standard Method 2, South Kesteven are required to deliver a minimum of 839 dwellings per annum. Whilst Standard Method 2 is currently in consultation stage, we believe this demonstrates a clear direction of travel, with the identified housing requirement of the District likely to increase. This should be considered and planned for at this early stage of the Local Plan review to ensure robustness.

Given the early stage of this review, South Kesteven should seek to ensure that their process is robust to avoid an early review. We strongly believe that the housing need for the District should therefore be increased to 839 dwellings as a minimum.

The NPPF requires Local Planning Authorities to be aspirational in their plan making. NPPG is clear that the Standard Method identifies a minimum housing need figure. In combination with the 2019 Housing Delivery Test result, which outlined a historic under-delivery in South Kesteven and subsequently recommended a buffer be applied to the housing requirement of the district, the Local Planning Authority must take this opportunity to plan positively and ambitiously with the aim of meeting the housing requirement of the district as a minimum and making up for historic under-delivery.

*Recommendation: Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.*

#### **QUESTION 7d – Other Settlements**

***Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through 'windfalls'? If not, please provide details and any alternative proposals.***

The Issues and Options consultation paper outlines the proposed spatial distribution of development across South Kesteven in the 23 year plan period, with no set percentage being directed to Smaller Villages. Instead, the Local Plan is seeking to rely on existing commitments and windfalls for development in these locations. We do not consider that this represents aspirational growth or sustainable development.

We have outlined within these representations the valuable contribution which can be made by Smaller villages and rural settlements. Aside from the total capacity outlined in the table, which should be increased to achieve 839 dwellings per annum in line with our comments above, we suggest the LPA demonstrate aspirational planning by distributing a suitable and proportional level of growth toward Smaller Villages and other settlements.

The NPPF acknowledges that development is required in rural locations such as villages to retain and maximise the vitality of the settlement. Ropsley is identified as a Smaller Village in the Settlement Hierarchy but benefits from proximity to Grantham and the ample services located there. The distribution of dwellings to Smaller Village locations such as Ropsley will have the benefit of improving the vitality of the village whilst also ensuring the vitality of those communities within close proximity, including the small shops and services on offer.

It is considered to be particularly important in Smaller Village locations, that LPAs allocate a range of smaller sites, to ensure that development is encouraged and meets the communities requirements as well as those of the market.

In addition, Paragraph 68 of the NPPF recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area. In recognition of this important contribution, smaller settlements are considered to be particularly appropriate for accommodating levels of growth which remain in keeping with the size of the relevant settlement and its surrounding services.

Finally, given the historic under-delivery in the District, which has been highlighted by the Housing Delivery Test, South Kesteven have created an Action Plan to promote development through the District. One action within the Action Plan is to take a more pragmatic and positive view with respect to applications on windfall sites within Grantham and the wider district. This suggests that the reliance on windfall sites has been ineffective previously in small villages such as Ropsley. Therefore growth in these locations should be planned for decisively through the use of positive planning policies and appropriate allocations such as the Land to the west of Ropsley.

Given the increased housing need across South Kesteven, the sensitive allocation for growth in Smaller Villages presents an opportunity for the Local Planning Authority to boost the housing supply in a way that meets the requirements of the market, whilst achieving the aims of sustainable development.

### **Land west of Ropsley, Grantham**

These representations have been submitted with specific consideration to land west of Ropsley, Grantham. The site is considered suitable for residential development and could provide a meaningful contribution to the housing need for South Kesteven. This representation seeks to demonstrate that the site constitutes sustainable development and aligns with the adopted Local Plan for South Kesteven and the NPPF and should be allocated to accommodate up to 30 dwellings

#### Site and Context

The Land west of Ropsley, Grantham measures circa 1.97 ha (4.87 acres). It is located directly adjacent to the settlement of Ropsley and is bound by residential development to the east and south.

The site is located adjacent to the existing built form of the settlement and provides the opportunity to deliver a sensitive and contextual high-quality residential development in a sustainable location, with no adverse impacts to the core shape and form of the settlement.

#### Statutory Designations and Constraints

The site is located largely within Flood Zone 1 (Lowest Risk of Flooding), with an element of Flood Zone 2 following the watercourse to the west of the site. It is envisaged that given the extent of the area within Flood Zone 2, no sensitive residential development would be located in this area. There are no statutory environmental designations relating to the site. A full range of technical assessments will be undertaken to inform the site allocation as the process progresses.

The site is located less than 30m from the a bus stop which provides sustainable transport connections by bus to Grantham, Billingborough and Aslackby. A Primary school is located c. 325m to the east of the site. Ropsley also benefits from a Pub, church Garage, Sports centre/ Village Hall and hot food takeaway.

#### Proposal

It is envisaged that a sensitive development of up to 30 dwellings could be located on site, with high quality design and landscaping being at the forefront of the scheme, to reflect the character of the Village. Given the

nature and character of Ropsley, it is envisaged that the site could be developed in line with the aims of the Parish to help meet housing needs in this rural location over the plan period.

There are no listed buildings on, or within close proximity to the site. The site is not located within or in close proximity to a conservation area.

The site benefits from mature tree growth to the western boundary which could be retained through any scheme to screen the development from the countryside beyond. The tree growth in this area would also provide a natural defensible boundary to the village, acting to restrict further growth into the countryside.

Summary

In all, it is envisaged that the site could be designed to be sensitive to the character of the existing settlement, with a high quality landscaping scheme to buffer the development from the countryside beyond and the adjacent dwellings.

The land west of Ropsley presents an excellent opportunity as a deliverable residential site in a sustainable location. The development of the site to accommodate up to 30 dwellings would allow the delivery of much needed housing, including more affordable homes, whilst rounding off the existing built form of Ropsley Village.

An early assessment has identified that the site is relatively unconstrained, and could make an important and proportionate contribution to the housing requirements of the District and the village. The potential to deliver a high quality design on the site would also meet the requirements of economic sustainability, enhancing the vitality of the settlement. Therefore, we respectfully request that the comments enclosed within these representations are taken into full regard, and the Land west of Ropsley, Grantham is allocated in the emerging Local Plan, as a deliverable and developable residential site.

Yours sincerely



Rob Moore  
Associate Director

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# Land at Heath Farm (South of Harrowby Lane), Grantham

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Representations to South Kesteven District Council Local Plan Issues and Options Consultation



# Land at Heath Farm (South of Harrowby Lane), Grantham

Representations to South Kesteven District Council Local Plan Issues and Options Consultation

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## Contents

1.	Introduction	1
2.	Site Context	3
3.	South Kesteven Local Plan Issues & Options Commentary	7
4.	Summary and Conclusions	11
-	Recommendation One: <i>Retain the Objectives outlined within the adopted Local Plan through the Local Plan Review to 2041.</i>	11
	<b>Appendices</b>	<b>13</b>
	Appendix 1 Site Location Plan	14

# Land at Heath Farm (South of Harrowby Lane), Grantham

## Representations to South Kesteven District Council Local Plan Issues and Options Consultation

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### 1. Introduction

- 1.1. These representations have been prepared by Savills (UK) Ltd on behalf of the landowner of the Land at Heath Farm (south of Harrowby Lane), Grantham, in response to the South Kesteven District Council (SKDC) Emerging Local Plan Review- Issues and options consultation.
- 1.2. As a landowner within the District of South Kesteven, our client wishes to be a pro-active participant in the Development Plan process and to build upon their effective working relationship with South Kesteven District Council. Our client therefore intends to continue to play a full and active role in ensuring that the wider planning strategy and framework for South Kesteven is deliverable in the timescales envisaged by the planning process.
- 1.3. These representations refer specifically to the Land at Grange Farm (South of Harrowby Lane), as outlined within the attached red line plan.
- 1.4. This document provides comments on specific and relevant questions/options raised within the South Kesteven Local Plan - Issues and Options Consultation document in the context of the site being deliverable and developable, in accordance with the NPPF.
- 1.5. We envisage that a full range of technical reports will be prepared in support of the site as the review process progresses, with a view to demonstrating that the site is deliverable and developable in the short to medium term. These will be used to inform a planning application to follow shortly after the successful allocation of the site.

# Land at Heath Farm (South of Harrowby Lane), Grantham

## Representations to South Kesteven District Council Local Plan Issues and Options Consultation

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- 1.6. This representation has been prepared in accordance with paragraph 35 of the NPPF which states Local Plans must be:
- a. **Positively prepared** - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b. **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c. **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and,
  - d. **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.7. The following sections of this report are arranged as follows:
- Section 2: Provides background to the site including outlining the sites deliverability and developability;
  - Section 3: Sets out our comments on the Local Plan Issues and Options Consultation Document; and,
  - Section 5: Concludes and summarises the report.

## 2. Site Context

### Site Description

- 2.1. The Land at Heath Farm (The Site) comprises approximately 112.3 ha (277.5 acres) of land, located south of Harrowby Lane. The site is located to the east of Grantham outside of, but within close proximity of the existing built form of the settlement. Grantham is identified as a Market Town within the adopted Local Plan (2020).
- 2.2. The site fronts onto Harrowby Lane to the north, with land comprising the Local Plan site allocation at Prince William of Gloucester Barracks (GR3-H4) directly adjacent to the southern boundary of the site. The site is located entirely within Flood Zone 1 (Lowest risk of flooding) and is not subject to any statutory ecological designations.
- 2.3. There are two heritage assets located to the north west of the site c.100m from the site boundary:
  - Grade II\* Listed Harrowby Hall
  - Grade II\* Listed Archway at Harrowby Hall
- 2.4. The extent of the site is outlined in **Appendix One**.
- 2.5. The site is currently unallocated within the South Kesteven District Council (SKDC) Local Plan, adopted 2020.
- 2.6. The site is sustainably located, presenting the opportunity to build upon the existing allocations to deliver a coherent rounding off of Grantham.
- 2.7. A Landscape Study will be undertaken to support the promotion of the site for development.
- 2.8. The development of the Land at Heath Farm would represent sustainable development in this market town location, with a number of services located within walking distance. Two food stores are located less than one mile from the site, with a number of pubs, restaurants, schools, leisure facilities, doctors surgeries, a hospital and churches located in Grantham. The Centre of Grantham is located circa 2 miles west of the site.
- 2.9. Grantham Railway Station is located around 2 miles from the site and runs regular services to the North, London and Scotland, on the EMR, Hull Trains and LNER lines. There are bus stops located around 500m from the site, from which the Grantham circular offers regular access to Grantham town centre.

# Land at Heath Farm (South of Harrowby Lane), Grantham

## Representations to South Kesteven District Council Local Plan Issues and Options Consultation



2.10. Given the frontage onto Harrowby lane, there are a number of suitable access solutions which would facilitate a development of up to 1900 dwellings on site. There are also opportunities for connectivity between the land at Heath Farm (South of Harrowby Lane) and the site allocations to the south, which would result in a cohesive and logical extension to Grantham.

2.11. These representations comment on South Kesteven District Councils 'Issues and Options Document' in the context of the Land at Heath Farm, Grantham. We also hope to demonstrate through these, and future representations that the site is deliverable and developable, presenting a strong opportunity to deliver c.1900 units in this sustainable location, assisting SKDC in their aim of delivering growth in this strong market area.

### **Deliverability and Developability**

2.12. We envisage that a full range of technical assessments will be undertaken as the Local Plan Review Process progresses, Initial assessments undertaken indicate that there will be no insurmountable technical constraints which would prevent the development of Land at Heath Farm, Grantham.

2.13. We welcome feedback and discussion from South Kesteven in terms of targeted technical work in the interests of supporting a sound Local Plan, however there is clearly a wealth of evidence which can be drawn on. By way of an overview we can report as follows.

### **Landscape, Environment and Topography**

2.14. Like much of the area surrounding Grantham in this location, South Kesteven's 2017 Landscape Character Assessment identifies the site as an area of Great Landscape Value.

2.15. Within the 2015 'Grantham Capacity and Limits to Growth Study' it is noted that '*The Harrowby Lane area is considered to have an undistinguished, commonplace landscape character, thus increasing its suitability for development*'

2.16. Given the site's position, a Landscape and Visual Impact Assessment will be undertaken to ensure that the landscape impact of any development on site can be properly understood allowing the design of any forthcoming proposals to be landscape led from the outset. A landscape buffer can be accommodated on site to account for the topography in the area. Further mitigation is also expected to ensure there will be no harm to the landscape character or key views from year 5 -15 onwards.

### **Access, Highways and Transport**

2.17. Access to the site is proposed to be taken from Harrowby Lane. Given the significant frontage onto Harrowby Lane, we consider that an access from this location will be achievable, with the road suitable to accommodate development without a significant impact on the local highways network.

### **Ecology**

# Land at Heath Farm (South of Harrowby Lane), Grantham

## Representations to South Kesteven District Council Local Plan Issues and Options Consultation

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- 2.18. A search of the DEFRA MAGIC ecology map concludes that there are no statutory designations affecting the site which relate to ecology or biodiversity. Additional reports will be undertaken to address the site specific constraints, though it is not considered that there are any fundamental environmental considerations which would prevent the development of the site in the short term.

### **Flooding and Ground Conditions**

2.19. The Land at Heath Farm lies entirely within Flood Zone 1 (lowest risk of flooding) as set out in the Environment Agencies Flood Mapping. The site is therefore at 'very low risk of surface water flooding'. Given the geology of the area, it is envisaged that the site could be developed to incorporate Soakaways and Sustainable Urban Drainage within its design.

### **Grantham Capacity and Limits to Growth Study**

2.20. The Grantham Capacity and Limits to Growth Study was undertaken in 2015 to form part of the evidence base for the adopted Local Plan. The study assesses locations within Grantham against key criteria including:

- Environmental constraints;
- Transport and accessibility;
- Geo-environmental considerations;
- Infrastructure capacity and potential;
- Landscape and topography;
- Heritage considerations;
- Housing need;
- Regeneration potential;
- Economic development; and
- Spatial constraints and opportunities.

2.21. Within the assessment, the Land south of Harrowby Lane, the eastern area of the Land south of Harrowby Lane is identified as 'Suitable for housing development in the longer term/ contingency'. The report suggests that the site should be brought forward in line with the allocated Barracks site to the south to create a coherent extension to Grantham.

2.22. In this context, the site should be allocated through growth within the Local Plan review, given it is clearly evidenced as a suitable site to accommodate growth.

## 3. South Kesteven Local Plan Issues & Options Commentary

### Question 2

#### Objectives

*Do you agree that the Objectives should remain the same for the new plan? If not then please provide details*

- 3.1. We support the objectives of the adopted Local Plan and suggest these remain for the Local Plan Review.
- 3.2. We particularly support objective 6 which seeks to enhance the role of Grantham as an important Sub-Regional centre by ensuring the town is the main focus for new housing, employment and other facilities.

**Recommendation One:** *Retain the Objectives outlined within the adopted Local Plan through the Local Plan Review to 2041.*

### Question 5a

#### Settlement Hierarchy

*Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not please provide details of what changes you think should be made.*

- 3.3. We agree that the Settlement Hierarchy outlined within the adopted Local Plan should be retained through the Local Plan Review. The distribution of dwellings across the District at a level proportionate to the level of shops and services in each settlement.
- 3.4. Whilst we support the key issues and opportunities outlined within the Issues and Options consultation document regarding providing support to a diverse local economy and thriving Town Centres, we feel it will be particularly important to ensure that the direction of future growth is well located in recognition of the significant positive impact residential development can have in supporting the sustainability and vitality of existing Market Towns.

# Land at Heath Farm (South of Harrowby Lane), Grantham

## Representations to South Kesteven District Council Local Plan Issues and Options Consultation



3.5. National Planning Policy Guidance shows support for this approach, stating that:

*'Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services'.*

3.6. Proposal 1 as outlined within the Issues and Options document, seeks to strengthen the role of Grantham as a Sub-regional Centre through significant housing growth. The aim outlined within the consultation document is for Grantham to provide for both the local community and visitors from a wider area.

3.7. We support this objective and encourage the council to continue directing significant growth to Grantham to achieve this aim.

**Recommendation Two:** *Support the vitality of the existing shops and services in Grantham by allocating sufficient suitable sites for residential development in and around the Market Town.*

### Question 6

#### **Housing Need and Requirement**

*Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?*

3.8. This Local Plan review is being undertaken, in part, due to the adopted housing target of 650 dwellings per annum being based upon out of date assessments of housing need and the introduction of the Standard Method for calculating housing need in 2018, which has increased the housing requirement of South Kesteven to 732 dwellings per annum. The NPPF expects strategic policy making authorities to follow the standard method for calculating local housing need.

3.9. Changes to the standard method for assessing local housing need were released through the 'Changes to the Current Planning System' consultation in 2020. These changes use the most recent data and seek to achieve a better distribution of homes according to need and support the Governments ambition to support 300,000 homes a year. Figures referred to as 'Standard Method 2' were the result of these amendments.

3.10. Utilising the calculations within Standard Method 2, South Kesteven are required to deliver a minimum of 839 dwellings per annum. Whilst Standard Method 2 is currently in consultation stage, we believe this demonstrates a clear direction of travel, with the identified housing requirement of the District likely to increase. This should be considered and planned for at this early stage of the Local Plan review to ensure robustness.

# Land at Heath Farm (South of Harrowby Lane), Grantham

## Representations to South Kesteven District Council Local Plan Issues and Options Consultation



- 3.11. Given the early stage of this review, South Kesteven should seek to ensure that their process is robust to avoid an early review. We strongly believe that the housing need for the District should therefore be increased to 839 dwellings as a minimum.
- 3.12. The NPPF requires Local Planning Authorities to be aspirational in their plan making. NPPG is clear that the Standard Method identifies a minimum housing need figure. In combination with the 2019 Housing Delivery Test result, which outlined a historic under-delivery in South Kesteven and subsequently recommended a buffer be applied to the housing requirement of the district, the Local Planning Authority must take this opportunity to plan positively and ambitiously with the aim of meeting the housing requirement of the district as a minimum and making up for historic under-delivery.

**Recommendation Three:** *Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.*

### Question 7a

#### **Focus of Housing Growth on Grantham**

*Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not please provide details and any alternative proposals.*

- 3.13. Whilst we are supportive of the distribution of growth to all levels of the hierarchy across South Kesteven, we agree that the focus of growth (50-55%) in the district should be Grantham.
- 3.14. As previously outlined, Grantham is home to a number of shops and services as such, any growth in this area of the district would benefit from easy access to a range of services and minimise the requirement of future residents to travel.
- 3.15. The land at Heath Farm (south of Harrowby Lane) presents a clear opportunity to deliver sustainable development in Grantham, supporting local services and contributing to the vitality of the market town.
- 3.16. There are a number of existing allocations within Grantham within the adopted Local Plan, with the allocation of the site suitably located to support and facilitate their delivery, whilst locating growth to effectively round off the settlement.

# Land at Heath Farm (South of Harrowby Lane), Grantham

## Representations to South Kesteven District Council Local Plan Issues and Options Consultation

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- 3.17. We have demonstrated that the site is deliverable. It is located entirely within Flood Zone 1 and benefits from a number of suitable access points. There are also opportunities offered by the frontage onto Harrowby Lane to deliver a local shop or other such community facility which would be of benefit to future residents of the site, as well as residents at adjacent allocated sites and those to the east of Grantham more broadly.
- 3.18. It is envisaged that the site could deliver a landscape led scheme, working with the existing landscape and improving upon the special landscape area adjacent. The site is large enough to deliver a well-designed scheme which focusses on the quality of life for residents, delivering plentiful outdoor public and private amenity space and a landscape buffer to the countryside beyond.
- 3.19. With a capacity of 1900, the Land at Heath Farm (South of Harrowby Lane) presents the opportunity to deliver a significant proportion of the required growth in Grantham for the extended plan period, in a sustainable location. The site also presents the opportunity to deliver a number of affordable houses, making a significant contribution to the identified need as outlined in the SHMA update (2017).
- 3.20. Our Client is the sole landowner of the site and is committed to working with SKDC through the Local Plan Review to demonstrate that the Land at Heath Farm is deliverable and can be developed to meet the common aims of the LPA, landowner and the community.

**Recommendation Four:** *Continue to direct much of the Districts required growth to Grantham.*

**Recommendation Five:** Allocate the Land at Heath Farm (South of Harrowby Lane) to accommodate up to 1900 dwellings.

## 4. Summary and Conclusions

- 4.1. These representations have been prepared by Savills (UK) Ltd on behalf of the landowner of the Land at Heath Farm (south of Harrowby Lane) and submitted in response to the South Kesteven District Council Local Plan Review Issues and Options Consultation. Whilst the site is immediately available, it is likely to be delivered over the medium to long term, building upon the Barracks allocation. The sustainably located site could provide c. 1900 dwellings making an important contribution to sustaining the Council's future land supply.
- 4.2. The landowner is committed to promoting the Land at Heath Farm for development and is willing to engage with the Local Planning Authority to present the Land at Heath Farm as developable. To this end, further technical work will be undertaken to support the plan process in due course.
- 4.3. We have provided our recommendations for the preferred direction of travel for the Local Plan Review, in response to a series of questions regarding the direction of growth in the District. These comments are made in the interests of effective, justified, consistent and positive plan making. Our recommendations are made in the context of ensuring the Plan delivers essential residential growth which aligns with the economic ambitions of the Council.
- 4.4. Principally, we support ensuring maximum flexibility and optimising levels of development across the plan period. It is important to acknowledge that there should be no cap on sustainable development where a range of benefits will be delivered, and this should not be used as a mechanism to stifle the development potential of sites.
- 4.5. Our recommendations for future iterations of the plan are as follows:
- **Recommendation One:** *Retain the Objectives outlined within the adopted Local Plan through the Local Plan Review to 2041.*
  - **Recommendation Two:** *Support the vitality of the existing shops and services in Grantham by allocating sufficient suitable sites for residential development in and around the Market Town.*
  - **Recommendation Three:** *Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.*
  - **Recommendation Four:** *Continue to direct much of the Districts required growth to Grantham.*
  - **Recommendation Five:** *Allocate the Land at Heath Farm (South of Harrowby Lane) to accommodate up to XX dwellings.*

# Land at Heath Farm (South of Harrowby Lane), Grantham

## Representations to South Kesteven District Council Local Plan Issues and Options Consultation

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- 4.6. In summary, the Land at Heath Farm (South of Harrowby Lane) has excellent potential to create a landscape led, high quality, logical extension to the settlement of Grantham. These representations seek to demonstrate the site is developable and deliverable and should therefore be allocated to accommodate residential development of circa 1900 dwellings on site.
- 4.7. The land at Heath Farm provides an opportunity to contribute towards the housing requirement in Grantham. The site is located in an area which will form a natural extension to existing housing allocations located to the south east of Grantham, providing vital housing to aid in the long term sustainability of the settlement.

# Land at Heath Farm (South of Harrowby Lane), Grantham

Representations to South Kesteven District Council Local Plan Issues and Options Consultation

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## Appendices

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# Land at Heath Farm (South of Harrowby Lane), Grantham

Representations to South Kesteven District Council Local Plan Issues and Options  
Consultation

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## Appendix 1 Site Location Plan

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17 November 2020



Planning Policy  
 South Kesteven District Council  
 Council Offices  
 St Peters Hill  
 Grantham  
 Lincolnshire  
 NG31 6PZ

Rob Moore



### By Email Only

Dear Sirs,

#### **Land at Tennyson Avenue, Grantham South Kesteven District Council Local Plan Review (2041) Issues and Options Document**

This letter is sent in response to the South Kesteven District Council Local Plan Review- Call for Sites Consultation. Savills (UK) Ltd have been commissioned by the landowners of the above site to promote to their land at Tennyson Avenue, Grantham as a suitable site to locate a residential development in this sustainable location on the edge of Grantham. A call for sites form is also enclosed and should be read in conjunction with this letter which provides additional information on the suitability of the Land at Tennyson Avenue to accommodate development. The Land at Tennyson Avenue, Grantham is a deliverable and developable site which has potential to accommodate at development of circa 50 dwellings.

We understand this call for sites is undertaken as part of the Local Plan Review Issues and Options Consultation. Given the evolving housing land supply position in South Kesteven, we are fully supportive of this Local Plan review which is required to bring the Local Plan in line with the Governments aspirations to deliver 300,000 dwellings per annum.

#### **Land at Tennyson Avenue, Grantham**

This Call for sites has been submitted with specific consideration to the Land at Tennyson Avenue, Grantham. The site is considered suitable for residential development and could provide a meaningful contribution to the housing need for South Kesteven. This representation seeks to demonstrate that the site constitutes sustainable development and aligns with the adopted Local Plan for South Kesteven and the NPPF and should be allocated to accommodate residential development.

#### *The Site*

The Land at Tennyson Avenue, in its entirety, measures circa 49.37 ha (123 acres). It is located directly adjacent to the settlement of Grantham, with access taken from an existing track off the junction of Chaucer Close and Rossetti Court. Whilst the site in its entirety extends for a number of acres, it is envisaged that the site would be most suitable for development of circa 50 dwellings adjacent to the existing settlement boundaries of Grantham. This proposed level of growth works with the existing levels, bringing development to around the 100m ridgeline in order to be sensitive to landscape features on the wider site.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS.

A subsidiary of Savills plc. Registered in England No. 2605138. Registered office: 33 Margaret Street, London, W1G 0JD



The site is located adjacent to the existing built form of the settlement and provides the opportunity to deliver a sensitive residential development in a sustainable location, with no adverse impacts to the core shape and form of the settlement.

The site is located entirely within Flood Zone 1 (Lowest Risk of Flooding). There are no statutory environmental designations relating to the site. A full range of technical assessments will be undertaken to inform the site allocation as the process progresses.

There are no listed buildings on, or within close proximity to the site. The site is not located within or in close proximity to a conservation area.

The area surrounding the site is largely residential in nature. The centre of Grantham is located around 1.17 miles south west of the site. The nearest bus stop to the site is 0.2 miles to the north and provides regular sustainable transport links to the shops and services within Grantham town centre. Harrowby Lane itself is home to a number of shops and services, such as a doctors surgery, local convenience store, primary school and a church, all of which are in walking distance to the site.

### Proposals

As outlined above, whilst the site is of a sufficient size to accommodate a large quantum of development, we consider a development of up to 50 dwellings would be more appropriate to work with the levels of the land at this location and minimise any impact on the adjacent land which is noted for its landscape value. It is envisaged that any development brought forward on site would be of high quality design, with landscaping being utilised to develop a landscape buffer between the edge of the settlement and Halls Hill.

Access would be retained as existing, utilising a track from Chaucer Close onto Rossetti Court. Initial highways assessments are currently underway to demonstrate this is a suitable access solution to accommodate a small scale development in this location.

### Summary

In all, it is envisaged that the site could be designed to be sensitive to the character of the existing settlement, delivering a number of dwellings on this site which can be developed in the short term.

The land at Tennyson Avenue presents an excellent opportunity as a deliverable residential site in a sustainable location on the edge of Grantham. The development of the site to accommodate 5-10 dwellings would allow the delivery of much needed housing, rounding off the existing built form of Grantham in this location and protecting the adjacent landscape.

Our client is committed to working with South Kesteven District Council throughout their Local Plan review in order to assist in shaping the plans for housing growth in Grantham and across the district more broadly. Therefore, we respectfully request that the comments enclosed within these representations and on the attached Call for Sites form are taken into full regard, and the Land at Tennyson Avenue, Grantham is allocated in the emerging Local Plan, as a deliverable and developable residential site.

Yours sincerely



Rob Moore  
Associate Director

Planning Policy  
Spatial & Economic Growth  
South Kesteven District Council  
Council Offices, St Peter's Hill  
Grantham, Lincolnshire  
NG31 6PZ

23<sup>rd</sup> November 2020

Dear Sir or Madam,

**SOUTH KESTEVEN LOCAL PLAN REVIEW – POTENTIAL HOUSING LAND ALLOCATIONS -  
LAND AT GORSE LANE, GRANTHAM – INVICTA DEVELOPMENTS**

We write on behalf of our client Invicta Developments to provide South Kesteven District Council (the Council) with further information in respect of the deliverability of their two land interests at Gorse Lane, Grantham. Sites which we propose to be considered as potential housing land allocations within the emerging South Kesteven Local Plan Review.

For clarity, the Council's previous references for our client's land interests were as follows: -

- Gorse Lane East, Grantham – Previous Draft Local Plan Ref. SKLP143 & SKLP 227
- Gorse Lane West, Grantham – Previous SHLAA Site Ref. GRA14-26

The comments made within this letter provide our client's representations to the South Kesteven Local Plan Review Issues & Options Paper (October 2020).

This response should be read as an update to the documentation that we submitted to the Council to justify the allocation of the site sites for residential development throughout the preparation of the now adopted Local Plan. Within which the sites are allocated within the strategic employment allocation GR-SE1.

For brevity we do not again set out the deliverability of the two sites for residential use in this response, we instead summarise the evidence previously submitted to the Council and we can confirm that the site's characteristics remain the same. The fact that the site is allocated for development in the current local plan provides evidence of the acceptance that the sites are considered to be suitable, available, and achievable sites for development. Any remaining details associated with their development for residential use can be provided as part of a future planning application or at the request of the Council as part of the Local Plan Review process.

This response therefore focuses on the following three key areas: -

- Housing Requirement & Distribution.
- Marketing of the Sites for Employment Use.
- Progress on the adopted Grantham Housing Allocations.

The conclusion of this statement is that the two sites should be allocated for residential use in the Local Plan Review on account of: -

- The increase in the District's housing requirement.
- There is no demand for the site for employment use.
- Meeting the shortfall of housing associated with the delayed delivery of the Grantham housing allocations.

The two sites remain situated in a suitable and highly sustainable location in respect of existing and proposed settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the sites.

## HOUSING REQUIREMENT & DISTRIBUTION

In response to **Question 6** of the consultation document, whilst the proposed increase of the housing requirement to mirror the current Standard Method is acknowledged, we must stress here that the PPG confirms that the Standard Method represents the minimum starting point in determining the number of homes needed in an area and that *“it does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour”*.

In this context PPG is clear that *“there will be circumstances where actual housing need may be higher than the figure identified by the standard method”*.

PPG is also clear that *“authorities should also consider recent assessments of need, such as a Strategic Housing Market Assessments (SHMA). Where these assessments suggest higher levels of need than those proposed by a strategic policy-making authority, an assessment of lower need should be justified”*.

We therefore reserve the right to review the Council’s updated housing market needs assessment evidence base which should be provided to support the Draft Local Plan which is expected to be published in August 2022.

In addition to the above, the proposed revised Standard Method requirement for the District would result in an increase to 839 homes per annum. The amended Standard Method will likely be confirmed by the time the Draft Local Plan is published and thus should inform the proposed housing requirement of the plan, alongside up to date housing needs assessment evidence.

It is therefore highly likely that the housing requirement of the District will substantially increase from that identified in the adopted Local Plan. Over the revised plan period this could equate to an additional 104 to 189 homes per annum or 1,248 to 2,268 additional homes over the current Local Plan period 2024-2036 and 3,770 to 4,195 more homes in the additional Local Plan Review period 2036 to 2041. **A total of 5,018 to 6,463 additional homes over the period 2024 to 2041.**

When it comes to allocating housing sites to meet the increased housing requirement, there are no other sites that we are aware of which are more appropriate in deliverability and sustainability terms than the two Gorse Lane sites.

Turning back to **Question 5**, Grantham should remain the focus of growth in the District. It is the most sustainable location for development and the infrastructure currently being delivered, namely the Southern Relief Road, will enhance the sustainability and connectivity of the Town.

Though the delivery of the road looks to be delayed, it will be delivered before the end of the new plan period, enabling the acceleration of the delivery of new homes from the Southern Quadrant Site and Prince William of Gloucester Barracks site within the latter years of the plan. In the meantime, additional sites that can deliver new homes within the next 5 years, and which can contribute funding to the delivery of the relief road should be considered favourably. Sites such as client’s land at Gorse Lane.

The proposal to meet the increased housing requirement through the allocation of a new settlement should only be considered once all deliverable sites within the settlement limits of Grantham have been exhausted. Including our client’s sites at Gorse Lane.

It must also be remembered that the Southern Quadrant and Prince William of Gloucester Barracks sites are technically “new settlements” in respect of size and scale. Before the Council seeks to allocate additional sites of a similar size, it must ensure that these sites can successfully deliver the number of homes stated in the current Local Plan in the first instance. Accordingly, we believe smaller sites which

can deliver new homes within 1-2 years of allocation should be considered in the first instance in order to provide a more flexible and balanced supply of housing sites.

## MARKETING OF THE SITES FOR EMPLOYMENT USE

On account of the two sites being located within the strategic employment allocation in the Local Plan, our client has actively been marketing the sites for over a year. Enclosed with this letter are the relevant sales brochures and a report from our client's agent which states as follows: -

***On average since the land was listed towards the end of October 2019 it has reached 430 views on Rightmove. This is far below the average for land hits online. We have had 5 enquiries in regards to the land which consisted of 1 acre for horse grazing, small commercial unit for storage, local interest in what is for sale and interest from 2 clients looking for medium sized units when completed for storage.***

***We have had in excess of 20 clients we deal direct with interested in housing development only and would be keen for parcels of 40 to 200 houses each but cannot find value in the commercial side. Advice from Chartered Surveyors specialising in commercial sales have advised an intake of interest in built units surrounding major city centres with easy access to M1 for North/South. Offices on edge of cities are also of interest for client downsizing due to staff working from home and less space required.***

The enclosed evidence confirms that there is no demand for the sites for employment use. The marketing of the site commenced before the COVID-19 pandemic and will be consequently be continued in order to provide a sustained picture of demand for the site for employment use.

However, whilst COVID-19 could be pointed at as a potential reason of the lack of demand for employment use, the enquiries/demand for the site for residential development runs counter to this argument. Furthermore, direct contact has also been received from housebuilders which include by Barratt & David Wilson Homes and LSL Land & New Homes.

We therefore believe that the current pattern of enquiries associated with the site's development will continue into the future and accordingly a strong case can be made that the sites should be developed for residential use.

## PROGRESS ON THE GRANTHAM HOUSING ALLOCATIONS

Within our hearing statements to the Local Plan Examination in Public we raised concerns associated with the delivery of new homes from four of the larger Grantham housing allocations in respect of when development would commence and how many new homes would be delivered per annum.

The Council's expected delivery timescales for each of the four sites is summarised as follows: -

- GR3-H1 – Spital Gate Heath: -
  - First Phase RM Approval - by 2019/2020
  - Delivery of 75 homes per annum in the period 2020/2021 to 2022/2023
  - Delivery of 140 homes per annum in the period 2023/2024 to 2035/2036
  - Total number of homes by 2036 = 2,150
  - Delivery of 140 homes per annum for remaining build period beyond 2036
  - Total Number of Homes = 3,700
  
- GR3-H2 – Rectory Farm (Phase 2 North West Quadrant): -
  - Delivery of 50 homes per annum in the period 2020/2021 to 2021/2022
  - Delivery of 75 homes per annum in the period 2022/2023 to 2035/2036
  - Total number of homes by 2036 = 1,150

- GR3-H3 - Rectory Farm (Phase 3 North West Quadrant): -
  - Delivery of 12 homes by 2023/2024
  - Delivery of 49 homes per annum in the period 2024/2025 to 2031/2032
  - Total number of homes by 2036 = 404
  
- GR3-H4 – Prince William of Gloucester Barracks: -
  - Allocation, Outline Planning Permission & First Phase RM Approval - by 2021/2022
  - First 50 Homes delivered by 2022/2023
  - Delivery of 125 homes per annum in the period 2023/2024 to 2025/2026
  - Delivery of 135 homes per annum in the period 2026/2027 to 2035/2036
  - Total number of homes by 2036 = 1,775
  - Delivery of 135 homes per annum for remaining build period beyond 2036
  - Total Number of Homes = 3,500 to 4,000

It has been 18 months since we undertook our previous assessment of the delivery timescales associated with each of the above sites.

At the point of writing these representations we understand that a Reserved Matters application has not been submitted yet in respect of the development of Site Ref. GR3-H1 and no Hybrid planning application has been submitted for Site Ref. GR3-H4. The result being at least one year's delay of delivery against the Council's predicted delivery rates. As this loss of delivery needs to be taken from the latter end of the plan, this would result in the loss of 140 homes from Site Ref. GR3-H1 and 135 homes from Site Ref. GR3-H4 over the plan period based on the Council's predicted annual delivery rates for both sites at the latter end of the current Local Plan period.

With regards to sites GR3-H1 and GR3-H4, the delivery of these sites is also entirely linked to the delivery of the Southern Relief Road. We previously envisaged that the road would be complete by 2024/2025. The progress made on the delivery of the link road in the last 18 months has not changed this position.

As a result, should the delivery of the Southern Relief Road/A1 Junction Works be delayed by a further year to 2024/2025, then this would result in the loss of a further 140 homes from Site Ref. GR3-H1 and 135 homes from Site Ref. GR3-H4 over the plan period based on the Council's predicted annual delivery rates for both sites at the latter end of the current Local Plan period.

On account of the above, the total number of homes lost from sites GR3-H1 and GR3-H4 against the Council's expected delivery rates is at least **550 homes**. Homes which need to be replaced within the Local Plan Review. The loss of these homes from the two sites cannot be retrieved before 2041 given that these sites are already proposed to delivery new homes beyond the extended Local Plan Review period to 2041.

For the avoidance of any doubt, for the reasons we previously set out in our hearing statements for the examination in public of the current adopted Local Plan, we believe that the delivery of homes from these two sites will be delayed further than that identified above and we still do not believe that the expected annual delivery rates for these two sites will be realised. We therefore envisage that this current identified shortfall will only increase by the time the Local Plan Review is examined in 2024.

With regards to the Rectory Farm site, no further planning applications have been determined or submitted in the period since the examination of the adopted Local Plan. We therefore reiterate our previous position that new homes will not be delivered from sites GR3-H2 & GR3-H3 until 2024/2025 at the earliest. However, given the proposed annual delivery rates are not overly excessive it is considered that the expected number of homes from these sites will be delivered by the extended Local Plan Review period to 2041. We will continue to monitor this situation at each stage of consultation on the new Local Plan Review though. It does however potentially mean that additional

sites may need to be released to ensure that the Council can maintain a rolling 5-year supply of deliverable housing sites.

In conclusion, additional sites need to be released as part of the Local Plan Review process to meet the anticipated **minimum shortfall of 550 homes** from allocated sites GR3-H1 and GR3-H4. This is in addition to the increased number of homes that are required in association with the expected uplift in the District's housing requirement.

When it comes to allocating housing sites to meet this identified shortfall, there are no other sites that we are aware of which are more appropriate in deliverability and sustainability terms than the two Gorse Lane sites.

## THE DEVELOPMENT PROPOSALS

The proposals seek to deliver a residential development of up to 500 new homes (at a density of 30dph), alongside areas of public open space, landscape buffer planting and associated infrastructure. The proposals will deliver a development which respects the character of the surrounding area and provide a high-quality residential development where people will want to live.

Enclosed with this letter is an Indicative Housing Layout, which identifies the key characteristics of the development proposals associated with both sites. The Indicative Housing Layout identifies the following key elements: -

- A size, layout, and configuration capable of supporting a sustainable housing scheme of up to 500 homes providing the ability to meet a range of housing needs.
- The delivery of a significant contribution to meeting affordable housing needs.
- Appropriate vehicular access can be taken from Gorse Lane, with new proposed pedestrian and cycle connections to existing areas to the north of the site and the allocated employment areas to the south.
- The enhancement of existing pedestrian and cycling connections between the two sites and the town centre. Enhancing the accessibility of the site by non-car modes. Also providing further benefits to pedestrian/cycling connectivity for the wider surrounding area.
- The provision of areas of on-site open space which will enhance the amenity value of the site, but which can also create high quality public spaces which link between the proposals and the existing and proposed uses which surround the site.
- Retention of areas of arboricultural value located within the site, where possible, and their enhancement along the site's boundaries to provide long-term defensible boundaries.
- Delivery of additional boundary landscape screening which will deliver improvements to any views onto the sites from the surrounding settlement area, whilst also screening prospective residents from visual and noise amenity implications associated with the A1.
- Suitable separation distances are also proposed between existing properties and those proposed within the development.
- Heights of the buildings located within the development would be carefully planned to ensure that they did not adversely impact on the landscape character of the area. Indeed, the delivery of any new homes on the sites would be similar in height to existing residential properties located along Gorse Lane and lower in height than any future commercial and retail buildings due to be delivered as part of the proposed development sites located to the south of the two sites.

The enclosed Indicative Housing Layout demonstrates that the proposed development of the two sites could achieve a high standard of design that protects and enhances the local area’s setting and character. Whilst also integrating with the proposed retail and employment uses located to the south of the two sites.

Furthermore, the release of the sites for residential development would deliver the following significant economic and social benefits: -

- Construction Investment to the area of £57.8m
- Creation of direct & indirect employment opportunities totalling 148 jobs
- A mix of circa 500 homes to deliver identified housing needs
- Social infrastructure investment to the area through S106 contributions
- Increased expenditure from residents to the area of £11.9m per annum, creating a potential additional 73 jobs in this sector
- Annual Council Tax payments of £768,000 & a New Homes Bonus payment of £4.6m which will help to sustain Council’s services
- Enhancements to the local highways network, particularly in respect of pedestrian and cycling connectivity
- Potential additional funding towards the delivery of the Southern Relief Road and A1 Junction Works

**DELIVERY TIMESCALES**

We envisage that a planning application for the proposed development of the two sites could be submitted to the Council as early as 2021 should the Council support our client’s development proposals. It is then expected that development would commence a year from the submission of the planning application.

Other than the delivery of the initial access infrastructure for the two sites there are no other major infrastructure works that need to take place prior to the commencement of delivery of new homes at the two sites. Accordingly, it is currently envisaged that first dwelling completions on the sites will take place in the last 6 months of the housing monitoring year 2022/23. Which we believe would still be in advance of the delivery of homes from existing housing site allocations GR3-H1, GR3-H2, GR3-H3 and GR3-H4.

Due to the size of the two sites there would be two development/selling outlets delivering new homes at the sites. It is therefore anticipated that the developments will deliver a yield of at least 60 homes per annum.

The table below provides the cumulative dwelling delivery projection per annum for the two sites which the Council can use within their future housing trajectory for the Local Plan Review: -

<b>Year</b>	<b>No. of Homes Cumulatively</b>
2022/2023	30 (final 6 months of year)
2023/2024	90
2024/2025	150
2025/2026	210
2026/2027	270
2027/2028	330
2028/2029	390
2029/2030	450
2030/2031	500

The delivery of affordable housing and identified areas of public open space and landscape planting for both sites will be delivered commensurate with the progression of the development and made available for use at an agreed point with the Council.

The development proposals can therefore deliver new homes and a number of significant socio-economic benefits to Grantham within the first five-year period of the Local Plan Review, alongside making a significant contribution to the Council's ongoing 5-year housing land supply requirements through the delivery of 500 homes entirely within the extended plan period.

## **CONCLUSION**

Based on the justification provided above it is considered that Invicta Development's Gorse Lane East and Gorse Lane West proposals will create sustainable, high quality and accessible developments which will provide significant social and economic benefits to Grantham and the wider South Kesteven area.

The sites can deliver a comprehensive development of market and affordable housing alongside a number of community benefits to meet the needs and aspirations of the local area over the extended plan period.

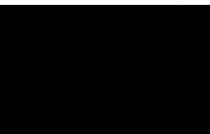
The development proposals are situated in a suitable and highly sustainable location in respect of existing and proposed settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the sites.

Evidence has been provided which demonstrates the lack of demand for the development of the two sites for employment use and the continued demand for residential development. Accordingly, we believe that the two sites should be re-allocated for residential development in order to meet the envisaged increase in the District's housing requirements and to make up the short-fall associated with the delay in the delivery of existing housing allocations in Grantham.

We trust that the information provided will be taken into consideration in the preparation of the South Kesteven Local Plan Review and specifically the Council's decisions in respect of future housing allocations.

Should you need any further information or wish to discuss any of the points made in these representations further, please do not hesitate to contact me.

Yours sincerely

A large black rectangular redaction box covering the signature area.

**PAUL BUTLER**  
Director

A black rectangular redaction box covering contact information.

Enc.

Enclosed are copies which I wrote back in 2011.

I do feel this is such an important subject, one which all humans require.

Yours faithfully

16<sup>th</sup> Nov 2020

Dear Sir or Madam  
Planning Policy Consultations  
South Kesteven Local Plan Review

Further to your letter dated 12/10/20

I raise the point of Public Toilets in Bourne. I wrote to your good selves back in 2011 and have raised the subject with the local Council. Unfortunately no-one considers the subject requires urgent attention.

I enclose copies of the Press Cuttings from 2011. I add one more idea. "It would be possible to 'Site' Portable Toos! I would suggest 4 Conveniences sited North-East-South-West from the Town Centre. Temporary Solution



# LETTERS

Please write to: The Editor, The Local, Newspaper House, 17 Abbey Road, Bourne, Lincs, PE10 9EF

## BOURNE PUBLIC TOILET CLOSURE

This is a sequel to my remarks and concerns expressed in last week's Local and answers to South Kesteven District Council cabinet member, Peter Martin Mayhew and colleagues, stating that they have closed the public toilets in Bourne as a result of vandalism, use by paedophiles and the cost of refurbishment and upkeep. Surely these are subjects which they should be addressing separately not the closure of the toilets.

Before making a decision with anything, the question has to be asked, is it really necessary? In the case of a toilet, it is not just necessary, it is essential - a must for all human beings.

To suggest that there is a provision from 8am to 6pm is just answering the question - what about the hours? For the councillor to tell the Stamford Mercury that people should use the toilets in shops, cafes and supermarkets and

that there are dozens of other places to go to the loo. What a cheek and embarrassment.

Come on you councillors, you have been elected to plan and provide amenities and essential services for the community using the monies provided from taxation.

Without public toilets, the clock will be turned back 100 years with people urinating and leaving human waste in public areas and shop doorways.

All civilised communities in this country and worldwide have good clean public facilities 24 hours a day.

I'm sure everyone is interested where the public toilet budget has been spent.

It must be such a small figure in terms of the total annual budget.

At a time when the population is increasing, Bourne has lost its hospitals, police and now public toilets. What will be next?

Perhaps a reduction in the salaries and expenses paid to councillors now that they do not have these essential services to plan and administer, or is this another subject?

*Tony Brooks*

## What people have said to The Local and the Bourne Forum.

### Toilets needed

write to you concerning the closure of the public toilets on South Street, Bourne.

I was born and bred in the town and we have always had the necessary amenities such as toilets etc. for members of the public to use. They are a much needed facility. People cannot help having to go to the toilet.

It is alright for the district council to say that the toilet blocks cause a problem with paedophiles but they need to tackle the problem. It won't just disappear because they closed the toilet blocks.

Would the council prefer to see people urinating in the street!

Toilets are required 24 hours a day. You cannot have opening times as has been suggested. It is not the answer to close down people's bodily functions.

In my view we do not require a large toilet block. One cubical and a urinal in the gents and two cubicals in the ladies, all suitable for wheelchair use, should be sufficient to meet demand.

All that is needed is a bit of forethought when it comes to designing the layout. The door should face onto the street, with a CCTV camera sited opposite.

I have also noted that there is not one sign post in the town to inform people as to the whereabouts of the public toilet on North Street which is being offered as an alternative. There needs to be clear signage.

With reference to the alternative toilets at the bus station, they are taken over by school children for two hours a day. Many people do

For Official Use Only:

REF: SK.IAO.0065

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		
First Name	EDWARD TOYNE	
Last Name	DRING	
Organisation	RETIRED	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone	[REDACTED]	
Email Address	[REDACTED]	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (or electronic response)	Date
[REDACTED]	18-11-2020

PLEASE EXCUSE MY POOR WRITING AS I AM VISION IMPAIRED AND FIND THIS DIFFICULT.

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

If not please provide details.

SHOULD INCLUDE MORE EMPHASIS AND DETAIL WITH REGARDS REDEVELOPMENT OF LIVING IN THE EXISTING TOWN BOUNDARIES.

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

If not please provide details.

SAFE GUARDING AGRICULTURAL LAND AND FOOD PRODUCTION WITH WORLD POPULATION'S AND DEMAND GROWING. THE U.K CAN NOT AFFORD INCREASING EXPENDITURE ON MORE EXPENSIVE FOOD. THIS ALONG WITH ENVIRONMENTAL SAFEGUARDS TAKING INTO ACCOUNT CLIMATE CHANGE.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

If not please provide details.

BE A LOT MORE FLEXIBLE.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

If not please provide details

MUST BE MORE FLEXIBLE. AFTER BREXIT AND COVID I WOULD SAY MANY WORK SITUATIONS WILL CHANGE FOOD PRODUCTION AS WELL AS ENVIRONMENT WILL NEED TO BE AN IMPORTANT CONSIDERATION -

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

If so, please outline any suitable and deliverable proposals.

RETAINING AGRICULTURAL LAND A MUST MORE USE OF EXISTING BROWN FIELD SITES AND RE DEVELOPMENT OF SHOPS AND APARTMENTS FOR HOUSING AND MORE EMPHASIS OF ENVIRONMENT IN THE TOWNS LESS CONCRETING OVER OF GARDEN SPACES MORE TREES AND EDUCATION TO CREATE BETTER ENVIRONMENTAL LIVING IN THE TOWNS.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

EXAMPLE MANY EMPTY HOUSES AND APARTMENTS IN GRANTHAM - SHOULD BE A PRIORITY TO IDENTIFY AND MODERNISE THESE FOR FAMILIES ALL EXISTING SERVICES ARE AT HAND.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

If not, please provide details and any alternative proposals.

THESE BECOME EXCLUSIVE AND VERY EXPENSIVE PLACES TO LIVE - LOCAL PEOPLE WHO WOULD WORK IN THOSE AREAS NOT ABLE TO AFFORD TO COMPETE

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes <input checked="" type="checkbox"/>		No <input type="checkbox"/>		Unsure <input type="checkbox"/>	
-----------------------------------------	--	-----------------------------	--	---------------------------------	--

If not, please provide details.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>		Unsure <input type="checkbox"/>	
------------------------------	--	----------------------------------------	--	---------------------------------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

RETENTION OF AGRICULTURAL LAND AND GREEN SPACES BE A BIGGER ASPECT OF FUTURE DEVELOPMENT. MUCH MORE EMPHASIS ON ENVIRONMENT IMPROVEMENT IN WARGREY TOWNS

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes <input checked="" type="checkbox"/>		No <input type="checkbox"/>		Unsure <input type="checkbox"/>	
-----------------------------------------	--	-----------------------------	--	---------------------------------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes <input type="checkbox"/>		No <input type="checkbox"/>		Unsure <input type="checkbox"/>	
------------------------------	--	-----------------------------	--	---------------------------------	--

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No <input checked="" type="checkbox"/>		Unsure	
-----	--	----------------------------------------	--	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes <input checked="" type="checkbox"/>		No		Unsure	
-----------------------------------------	--	----	--	--------	--

Please give details

MORE TO BE DONE TO ENFORCE RULES NOT ALLOWING PARKING ON PAVEMENTS

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

THE GRANTHAM CANAL IS A VIRTUAL RUBBISH TIP. THIS AREA BEFORE IT IS TOO LATE SHOULD BE CREATED INTO ANOTHER PARK TO COMPLEMENT WINDHAM PARK ON THE OTHER SIDE OF TOWN. A LARGE NUMBER OF HOMES AND FAMILIES WOULD BENEFIT FROM AN ENHANCED GREEN AND ENVIRONMENTALLY FRIENDLY SPACE.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**



For Official Use Only:

REF: SK.IAO.0066

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name		Jeremy
Last Name		Dawson
Organisation	Cecil Estate Family Trust	Strutt & Parker
Address	██████████	██████████ ██████████ ██████████
Postcode		██████████
Telephone		██████████
Email Address		████████████████████████████████████████

**Please note:** that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████████████████████████████████████	18 <sup>th</sup> November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	
If not please provide details.					
The Cecil Estate Family Trust broadly supports the strategic aim of delivering the right balance of jobs and housing services and infrastructure contained within the plan. In view of the issues and time scales involved with the supply of the Stamford North extension we consider that alternative smaller residential allocations should be promoted in the plan to reinforce delivery of the planned housing numbers over the plan period including 13.93ha at Church View, Stamford which has potential to deliver up to 300 residential units.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					
No Comment					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	
If not please provide details.					
No Comment					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	
If not please provide details.					

It is noted that policy H1 housing allocations is contained within the list of policies which are not proposed to be changed. For reasons set out in our responses to this consultation we believe policy H1 should be amended to bring more flexibility to how the authority meets its identified housing need. At present housing need in Stamford is largely planned to be met through one large strategic housing allocation (Stamford North Extension). As evidence shows large strategic sites do not deliver housing numbers quickly and traditionally take at least 10 years before any meaningful numbers are delivered to meet the authority's housing need. Locally this is evidenced by the housing delivery shown at Elsea Park Bourne. The inclusion of smaller more oven ready and infrastructure light residential allocations within the plan will help ensure the authority has sufficient sites to meet its housing need throughout the early phases plan period, rather than the tail end of the plan period.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

No Comment

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not, please provide details of what changes you think should be made.**

No Comment

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not, please provide details of what changes you think should be made.**

No Comment

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes

No

Unsure

If so, please outline any suitable and deliverable proposals.

No Comment

## 10. Proposal 6 – Housing Need and Requirement

### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes

No

Unsure

If not, what evidence do you have to justify an alternative need and requirement?

The Government's proposed changes to the standard methodology for calculating housing need would see a significant increase in the housing need for South Kesteven District Council increasing from 754 dwellings per annum to 839 dwellings per annum. Whilst we note that these changes have not been adopted, we welcome the council's acknowledgement that its local housing need figures should act as a minimum.

As we have referred to in our answers to question 3, the Local Plan relies upon the delivery of large strategic sites at both Grantham and Stamford to meet a significant quantum of its housing need. It has not produced a comprehensive up to date document setting out the assumed delivery rates from the sites allocated within policy H1. However, based upon the delivery rates of the other large strategic development sites within the district (Elsea Park), and other strategic sites across the country there is significant risk that the strategic sites identified within H1 will only start making a meaningful contribution towards the council's local housing need figures towards the middle and end of the plan period (2041). The local housing need figures identified within the plan are current housing need figures and are likely to increase further during the plan period as the population of the district grows. As is evidenced by the government's reassessment of the methodology of calculating housing need which already suggests the authorities annual target of 754 dwellings per annum is some way short of the actual housing requirement need of 839 dwellings per annum. Reliance on strategic allocations delivering housing numbers towards the middle and end of the plan period will expose the Authority to greater risk of not meeting the increasing housing delivery numbers identified through the life of the plan.

We therefore reiterate our contention that the housing allocations within the Plan need to encompass a better mix of smaller allocations and larger strategic allocations to allow greater flexibility and certainty in meeting the Authority's local housing need figures.

## 11. Proposal 7 – Distribution of Growth

### Q7a – Focus of Housing Growth on Grantham

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

Yes

No

Unsure

**If not, please provide details and any alternative proposals.**

Yes, we agree Grantham as the most sustainable location for growth within South Kesteven. The plan should however place greater recognition on the market appeal of Stamford which sits as the second settlement within the settlement hierarchy and the role it has to play in accommodating housing growth in its own right.

As referred to above the inclusion of Church View, Stamford as an allocated residential site would help in addressing a structural weakness of the Plan's heavy reliance on one large strategic site in Stamford to meet the majority of the housing growth identified for Stamford over the plan period. A site of the scale of Church View (300 dwellings) would be able to deliver housing within the first five years of the plan.

#### **Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

Yes

No

Unsure

**If not, please provide details and any alternative proposals.**

Yes, we agree Stamford should remain as a focus for growth.

#### **Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

Yes

No

Unsure

**If not, please provide details and any alternative proposals.**

No Comment.

#### **Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes

No

Unsure

**If not, please provide details and any alternative proposals.**

No Comment.

#### **Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes

No

Unsure

**Please provide details**

**Yes both factors should be taken into account before determining what growth to distribute to which area. We would comment that market capacity is often overlooked within the consideration matrix.**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If yes, please provide details.**

**No Comment.**

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not, please provide details.**

**No Comment**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not, please provide details.**

**No Comment**

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

No Comment.

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

##### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

No Comment

##### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

No Comment

#### 16. Proposal 12 – Need for Caravan Accommodation

##### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.



**Thank you for responding to this consultation.**

## Deeping St James Parish Council Response to the Local Plan issues and options.

What is changing:

1. Most policies will not be subjected to substantial changes – some may need minor tweaks.
2. Most changes relate to the update of housing needs and planning for housing growth to meet needs. This policy also includes provision for Gypsies and Travellers.
3. There is a need to update the evidence base for the Employment Land Study – to consider if there is sufficient provision in the current plan.
4. Following an examination of the Plan in September 2019, SKDC made a declaration about Climate Emergency to reduce carbon emission between now and 2030 and to aim for net zero by 2050.
5. Local economy recovery – following Covid 19 a review will be completed to consider if changes are needed to policies and proposals to support the local economy.

SKDC Question	Parish Council Response
Question 1a The Vision – Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.	The proposed changes in the Government White Paper – Planning for the Future – could impact on these proposals. The provision of improved infrastructure for the Deepings is essential. Reference should be made to the policies contained within the Neighbourhood Plan.
Question 1b The Vision – Do you consider that the current vision is sufficient to deal with climate change and the economic recovery of the District? If not please provide details.	No. The Vision does not go far enough. Recent changes to the Use Classes Order which allows the use of shops to be changed to a much broader base which may result in retail moving out of the Town Centre. This will have an enormous impact. The economic recovery will depend on sufficient employment opportunities.
Question 2 – Objectives – Do you agree that the objectives should remain the same for the new plan. If not please provide details.	No. The proposed development of further sites mainly to the East of the Deepings means that greater investment in local infrastructure is vital.
Question 3 – Policies not proposed to be changed significantly – (4) Do you agree with the list of Local Plan policies that are not proposed to be changed significantly. If not please provide details.	No. The Parish Council would ask that the following policies are given further consideration <b>SKLP Policy SP4 – Development on the edge of settlements</b> – This policy does not limit the size of developments which may happen on the edge of settlement. This is too generous and sites should be limited to no more than 10 houses. <b>SKDC Policy E4 – Protection of Employment.</b> Hard’s Lane is a small industrial Site in Deeping St James, but it is not included. <b>SKLP Policy OS1</b> - Currently there is an inadequate amount of open space in the Deepings. Therefore, it is extremely important that any new Development should include over and above the bare minimum needed to meet

	<p>requirements. Recent large developments have fallen woefully short in this respect.</p> <p>The current policy can be interpreted differently by developers and local councils, as it does not set out clear expectations of what is needed. Developers are allowed to include “bunds” which may be for noise reduction purposes to be included in their open space offer – this is not acceptable as space is needed for active recreational purposes.</p>
<p>Question 4 Plan Period - Do you agree with the proposed plan period up to 2041? If not please provide details.</p>	<p>It is difficult to respond to this when the next development sites have not actually been identified at this stage.</p>
<p>Question 5a – Settlement Hierarchy – Do you think the Settlement Hierarchy should be retained in the new Local Plan, if not please provide details of what changes you think should be made.</p>	<p>No. The Settlement Hierarchy makes reference to further housing developments within the Deepings. It is suggested that towns such as Grantham and Stamford should absorb the developments needed, as the infrastructure in both these towns is better suited to cope.</p>
<p>Question 5b – Settlement Hierarchy Methodology – Do you think the current Settlement Hierarchy Methodology - specifically with respect to determining larger villages – is appropriate for this review. If not please provide details of what changes you think should be made.</p>	<p>No – see above response. The larger villages Langtoft, Baston and Thurlby depend on the infrastructure of the Deepings, including health and education. Unless there is significant investment in the infrastructure of the Deepings, any new developments should be in Stamford and Grantham.</p>
<p>Question 6 - Housing Need and Requirement – Do you agree with the use of 754 dwellings per annum as the identified housing need and requirement for South Kesteven. If not, what evidence do you have to justify an alternative need and requirement.</p>	<p>This is a proposed increase of 16% of housing across the district per annum. Unless small in fill sites are used across the Parish, then this could result in large edge of settlement developments which will again impact on the loss of open space, reducing visual aspects and increasing pressure on infrastructure.</p>
<p>Question 7b. Stamford, Bourne and the Deepings. Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?</p>	<p>Whilst the Deepings may be considered an appropriate place for development, it is important that in addition to improving the infrastructure, provision of open space and recreational open space is given priority.</p>
<p>Question 7e – Consideration of the Market and Deliverability – Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area.</p>	<p>No – Decisions should not be based purely on whether a developer can sell houses they build. A holistic approach is needed. The impact on the current community, education and health all need to be carefully considered.</p>
<p>Question 8 - Gypsy and Traveller and Travelling Show people accommodation. Are you aware of any specific needs for Gypsy, Traveller or Travelling Show people accommodation in South Kesteven and suitable sites to meet these needs.</p>	<p>Deeping St James Parish Council have worked with Market Deeping Town Council, District and County Councillors, Landowners and the Police. It became necessary to create a process for everyone to know what to do when an illegal encampment happens. The Deepings is very close to Peterborough which does provide sites for Travellers and Gypsies.</p>

<p>Question 9a Strategic Employment Allocations – Do you agree that the Strategic Employment Allocations set out in policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?</p>	<p>Deeping St James Parish Council has no comment on this.</p>
<p>Question 9b – Other employment allocations Increasing Flexibility on Established Employment Areas.</p>	<p>Deeping St James Parish Council has no comment – most employment sites are located within Market Deeping.</p>
<p>Questions 10 and 11 – Climate Change Policies – Are the existing policies in the adopted local plan sufficient to meet current and future challenge of climate change?</p>	<p>Deeping St James Parish Council is not able to comment on these policies.</p>
<p>Question 12 – Need for Caravan Accommodation.</p>	<p>This does not state if the Caravan Accommodation is for Traveller sites or for general accommodation. There is already a large residential and Touring Caravan site within the Deepings.</p>
<p>Question 13 – Parking Standards – Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should be applied to.</p>	<p>It is very important that Parking Standards are introduced and adhered to. Tandem parking should not be a standard which is allowed for Developers to use. Deeping St James has many sites which have been allowed to provide inadequate parking for vehicles. This has resulted in on street parking, causing problems for refuse collection, emergency services, bus routes and visitor parking. Deeping St James Parish Council will ensure that any future planning of inadequate parking provision is challenged rigorously.</p>
<p>Question 14 - Any Other Comments – Is there anything else you would like to raise – Has anything been missed, or are there any general comments you would like to make?</p>	<p>The changes which are proposed to the planning process through the Government White Paper – if many of the proposals are implemented it is likely these could impact on the current level of services offered. The changes made to the New Use Classes order – this has to be carefully monitored to protect historic areas.</p>

19 November 2020  
 201116 Issues and Options - Representations Harrowby Lane



Planning Policy  
 South Kesteven District Council  
 Council Offices  
 St Peters Hill  
 Grantham  
 Lincolnshire  
 NG31 6PZ

Maria Boyce

**By Email Only**

Dear Sir/Madam,

**Land to the North of Harrowby Lane**  
**South Kesteven District Council Local Plan Review (2041) Issues and Options Document**

This letter is sent in response to the South Kesteven District Council Local Plan Review- Issues and Options Consultation. Savills (UK) Ltd have been commissioned by Absolute Property Development Ltd to make representations to the Issues and Options Consultation in relation to their land interests at Harrowby Lane, Grantham.

The submission and comments made outline that the land north of Harrowby Lane is a deliverable and developable site to accommodate a sensitive residential development in line with National and Local Policy.

We understand the Issues and Options Consultation is being undertaken in line with Adopted Local Plan Policy M1 which requires the review of the Plan prior to 2023, as well as the inspectors recommendation. Given the evolving housing land supply position in South Kesteven, we are fully supportive of this Local Plan review which is required to bring the Local Plan in line with the Governments aspirations to deliver 300,000 dwellings per annum.

Specific commentary has been provided below in response to the questions of relevance outlined within the Issues and Options Document.

A Vision Document has been prepared for the site which outlines 2 options for the development of the land (both of which are to be assessed separately) for:

- Option 1: 50 dwellings
- Option 2: 25 dwellings

The Document and Plans demonstrate the full technical evidence base required to demonstrate the site's deliverability (0-5 years) and therefore as a site that can make a meaningful contribution to the district's housing land supply in the short term.



## **Commentary on the Issues and Options Document**

### **QUESTION 1 Objectives**

#### **Do you agree that the Objectives should remain the same for the new plan? If not then please provide details**

We support the objectives of the adopted Local Plan and suggest these remain for the Local Plan Review. We particularly support objective 6 which seeks to enhance the role of Grantham as an important Sub-Regional centre by ensuring the town is the main focus for new housing, employment and other facilities.

**Recommendation One:** Retain the Objectives outlined within the adopted Local Plan through the Local Plan Review to 2041.

### ***QUESTION 3- Policies not proposed to be changed significantly***

#### ***Q4- Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.***

Proposal 3 outlines the policies not proposed to be changed significantly through the Local Plan review. Policy SP4 'Development on the Edge of Settlements' is included in the list of policies to be retained through the Local Plan. We do not consider that this approach aligns with the NPPF, particularly with regard to the need to take a more pragmatic view of windfall sites, as outlined in the Housing Delivery Test Action Plan (2019, updated 2020).

The policy is overly restrictive with regards to gaining 'substantial community support' for proposals and Local Plan Policy SP4 must be reviewed in order to ensure further flexibility in the way that the policy is applied, particularly on the edge of Grantham, as the District's major settlement.

An overriding aim outlined within the National Planning Policy Framework (NPPF), is to ensure that Plans are 'prepared with the objective of contributing to the achievement of sustainable development', and are prepared in a way that is 'aspirational but deliverable'. This approach is supported through Paragraph 11 of the NPPF:

*'Plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexible to adapt to rapid change'*

Incorporating flexibility also ensures that development will be market led and any deliverability issues with allocated sites (which results in fewer or no development being brought forward) can be compensated for on sites elsewhere, ensuring development still meets the identified need of the settlement.

**Recommendation Two:** Review Local Plan Policy SP4 to ensure sufficient flexibility for edge of settlement sites to come forward.

### ***QUESTION 5a- Settlement Hierarchy***

#### ***Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not please provide details of what changes you think should be made.***

We agree that the Settlement Hierarchy outlined within the adopted Local Plan should be retained through the Local Plan Review. The distribution of dwellings across the District at a level proportionate to the level of shops and services in each settlement.

Whilst we support the key issues and opportunities outlined within the Issues and Options consultation document regarding providing support to a diverse local economy and thriving Town Centres, we feel it will be particularly important to ensure that the direction of future growth is well located in recognition of the significant positive impact residential development can have in supporting the sustainability and vitality of existing Market Towns.

National Planning Policy Guidance shows support for this approach, stating that:

*‘Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services’.*

Proposal 1 as outlined within the Issues and Options document, seeks to strengthen the role of Grantham as a Sub-regional Centre through significant housing growth. The aim outlined within the consultation document is for Grantham to provide for both the local community and visitors from a wider area.

We support this objective and encourage the council to continue directing significant growth to Grantham to achieve this aim.

**Recommendation Two:** Support the vitality of the existing shops and services in Grantham by allocating sufficient suitable sites for residential development in and around the Market Town, particularly on accessible sites within easy walking distances to services and amenities.

**QUESTION 6 – Housing Need and Requirement**

***Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?***

This Local Plan review is being undertaken, in part, due to the adopted housing target of 650 dwellings per annum being based upon out of date assessments of housing need and the introduction of the Standard Method for calculating housing need in 2018, which has increased the housing requirement of South Kesteven to 732 dwellings per annum. The NPPF expects strategic policy making authorities to follow the standard method for calculating local housing need.

Changes to the standard method for assessing local housing need were released through the ‘Changes to the Current Planning System’ consultation in 2020. These changes use the most recent data and seek to achieve a better distribution of homes according to need and support the Governments ambition to support 300,000 homes a year. Figures referred to as ‘Standard Method 2’ were the result of these amendments.

Utilising the calculations within Standard Method 2, South Kesteven are required to deliver a minimum of 839 dwellings per annum. Whilst Standard Method 2 is currently in consultation stage, we believe this demonstrates a clear direction of travel, with the identified housing requirement of the District likely to increase. This should be considered and planned for at this early stage of the Local Plan review to ensure robustness.

Given the early stage of this review, South Kesteven should seek to ensure that their process is robust to avoid an early review. We strongly believe that the housing need for the District should therefore be increased to 839 dwellings as a minimum.

The NPPF requires Local Planning Authorities to be aspirational in their plan making. NPPG is clear that the Standard Method identifies a minimum housing need figure. In combination with the 2019 Housing Delivery Test result, which outlined a historic under-delivery in South Kesteven and subsequently recommended a buffer be applied to the housing requirement of the district, the Local Planning Authority must take this opportunity to plan positively and ambitiously with the aim of meeting the housing requirement of the district as a minimum and making up for historic under-delivery.

**Recommendation Four:** Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.

***QUESTION 7a – Focus of Housing Growth on Grantham Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals.***

Whilst we are supportive of the distribution of growth to all levels of the hierarchy across South Kesteven, we agree that the focus of growth (50-55%) in the district should be Grantham.

As previously outlined, Grantham is home to a number of shops and services as such, any growth in this area of the district would benefit from easy access to a range of services and minimise the requirement of future residents to travel.

In addition, Paragraph 68 of the NPPF recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area. This is considered to be particularly relevant in the short term, as such small and medium sites can often be developed and delivered relatively quickly. In recognition of this important contribution, the site is considered to be particularly appropriate for accommodating levels of growth in line with the spatial strategy.

Finally, given the historic under-delivery in the District, which has been highlighted by the Housing Delivery Test, South Kesteven have created an Action Plan to promote development through the District. One action within the Action Plan is to take a more pragmatic and positive view with respect to applications on windfall sites within Grantham and the wider district. This suggests that the reliance on windfall sites has been ineffective previously. Therefore growth in these locations should be planned for decisively through the use of positive planning policies and appropriate allocations such this site.

The land north of Harrowby Lane presents a clear opportunity to deliver sustainable development in Grantham, supporting local services and contributing to the vitality of the market town. The Vision Document outlines the technical evidence to support its allocation.

**Recommendation Five:** Continue to direct much of the Districts required growth to Grantham.

**Recommendation Six:** Allocate the Land to the North of Harrowby Lane.

***QUESTION 7e – Consideration of the Market and Deliverability\* Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?***

Yes – this is an extremely important consideration, not least because the alternative approaches for South Kesteven have not worked. Given the historic under-delivery in the District, which has been highlighted by the Housing Delivery Test, South Kesteven’s Action Plan specifically highlights the issues with the current allocations in terms of deliverability. The Action Plan champions a more proactive, pragmatic and positive view with respect to applications on windfall sites within Grantham and the wider district. Therefore growth in such appropriate locations should be planned for decisively through the use of positive planning policies and appropriate allocations such this site.

**Recommendation Seven:** Allocate the Land at Harrowby Lane to as a deliverable short term site, with market interest and funding for a revised application to be submitted immediately.

**Land to the North of Harrowby Lane**

These representations have been submitted with specific consideration to land to the North of Harrowby Lane. The development represents a sustainably located development on the edge of a defined built edge to Grantham providing a mix of housing and choice and the potential to contribute to a range of developer contributions including affordable housing, education and health contributions.

The site has the following benefits:

- Outside of settlement limits, the site at Harrowby Lane is undoubtedly one of the most sustainable locations for development within Grantham. There are a range of existing facilities, including Belmont Community Primary School, Harrowby C of E Infants School, Harrowby Lane Doctors Surgery,

Harrowby Lane Methodist Church, Tesco Express, local shops and takeaways, children's equipped play area and hard courts for football within walking distance of the site. The services already serve the immediate neighbouring areas and will be available to the proposed development when it is completed.

- The development will have a strong identity and sense of place that reflects its urban fringe location. New development, together with existing homes and facilities will add to the well served neighbourhood, with new green infrastructure, incorporating and building upon the existing ecology, will provide coherent connections and an attractive, well managed landscape setting for the new homes whilst providing opportunity for active leisure and play in a natural environment.
- The illustrative masterplan options set the framework and guidelines for a high quality design and architectural response for a future planning application.
- The site provides significant accessible new green infrastructure, incorporating and building upon the existing ecology to provide a net biodiversity gain across the site.
- The scheme will also facilitate wider connections and access to the countryside and recreational amenity areas such as Alma Woods Extensive consultation has been undertaken with the Woodland Trust, who are promoting their own woodland initiatives as part of Heritage Lottery Funding received. The proposals would help increase public access to these proposals and would provide a continuation of the woodland experience through the site, proving better connections to other recreation areas such as the Hills and Hollows. The NPPF (2019) states at para 200 that *"Local planning authorities should look for opportunities for new development....within the setting of heritage assets, to enhance or better reveal their significance"*.
- The scheme provides a robust drainage solution through use of sustainable urban drainage and would lead to a betterment of the pre-existing groundwater issues by rectifying existing water run off through the provision of a comprehensive drainage system.

Given the very limited impact of the development, the revised proposals for the site demonstrate it a clear contender for residential allocation which in tandem will deliver many public benefits.

We would be delighted to discuss proposals for the site with you in more detail.

Yours sincerely



**Maria Boyce MRTPI**  
Director

# Harrowby Lane

Vision Document for a deliverable, sensitive extension to Harrowby





# Harrowby Lane

The vision for Harrowby Lane is set out as a series of design principles that together establish a high quality extension to the Harrowby neighbourhood of Grantham.

The proposals will help create an improved urban edge to the town and deliver between 20-50 new family homes in line with the housing needs of the area.

## LEGEND

- Public Space
- Private Gardens
- Water Retention
- Roadways
- Shared Access
- Shared Road
- Decking

# Vision

The Local Plan Review for South Kesteven provides an ideal opportunity to consider new sites for growth within the District. Major growth continues to be promoted within Grantham as a key economic centre not only within Lincolnshire, but sub regionally.

As highlighted in the recent Inspector's Report, a range of sites will clearly be required to deliver this growth through a combination of town centre sites, the major urban extensions and sustainably placed urban fringe locations.

Harrowby Lane has a long planning history and as such a wealth of information is available to support its development. This Vision Document outlines two proposals for the smaller and medium scale development of the site. Both options have been carefully designed within the existing contours of the land to ensure that landscape impact is minimal. The land at Harrowby Lane offers many benefits, including:

## **A sustainable location**

The neighbourhood will be well connected by bus to Grantham town centre and the wider public transport network to further reduce dependence on the private car.

## **New homes with a strong identity**

Harrowby Lane will have a strong identity and sense of place that reflects its urban fringe location. New development, together with existing homes and facilities will add to the well serviced neighbourhood.

## **Landscape led design**

New green infrastructure, incorporating and building upon the existing ecology, will provide coherent connections & form an attractive, well managed landscape setting for the new homes whilst providing opportunity for active leisure & play in a natural environment.

## **Connections and Access to Local Area and Wider Countryside**

The existing network of footpaths, cycleways & roads will provide convenient connections to Alma Wood, local education & play facilities including nearby shops.



# Content

## Introduction

This document has been prepared to support the allocation of land at Harrowby Lane for the development of approximately 25-50 dwellings on the eastern edge of Grantham.

The document has been prepared the following team of consultants:

- » Savills (UK) Ltd – Planning and Heritage
- » ArkleBoyce Architects - Architecture, Masterplanning and Urban Design
- » Urban Wilderness – Landscape Architecture
- » Curtins – Transport, Access, Drainage and Ground Conditions

From analysis and evaluation of the land it is evident that the site has the potential to create a deliverable, developable and sustainable scheme.

## Purpose

The purpose of this document is to consider the capacity and technical ability to deliver growth at the land at Harrowby Lane, on the eastern edge of Grantham ('the site') and evidence how sustainable development could be delivered, taking into account the most recent appeal decision for the site.

The Vision Document considers how development on the site could come forward in line with the growth aspirations of South Kesteven. The document considers:

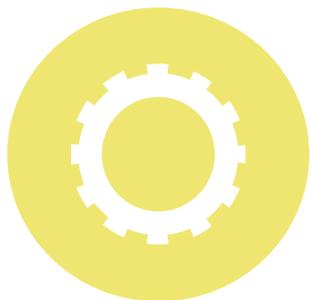
- » The site, its setting, placing it in the wider setting of Grantham
- » The technical challenges of delivering development on site, including landscape and visual impacts, heritage impact, topography, drainage, highways and ground conditions.
- » A vision and concept framework for sustainable development for the site.

## Background

Grantham is the main focus for growth within the area over the next 20 years as the key economic centre within the District. Given the level of growth required within and around the town the nature of the urban area and surroundings will change dramatically over the next 20 years. A range of housing sites of varying scales are required to achieve the growth and ensure that there is adequate and unconstrained land for development available to the market.

This document has been produced as part of the SKDC Call for Sites consultation and follows from a planning application and subsequent appeal made on the land.

The issues raised by the appeal have been thoroughly assessed and through the technical analysis a reduced scheme has been prepared addressing the landscape and heritage issues in full and the resulting revised scheme is submitted for consideration.



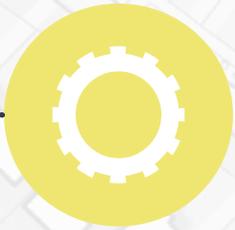
SITE  
CONTEXT



PRINCIPLE OF  
DEVELOPMENT



A SENSITIVE EDGE TO  
HARROWBY



SITE CONTEXT

# Location

The site is positioned on the eastern edge of Grantham on Harrowby Lane. The site abuts existing development in the form of 1970's sub-urban housing which is low to medium density. This housing is characterised by the significant green spaces and generous proportions given to the primary (loop) roads running through the site.

This is partly due to the change in level experienced by some of the housing, although the layout of the development is similar in areas where the topography is much flatter.

The site itself is greenfield and is currently used to graze livestock. The land is enclosed by established hawthorn hedging and self-seeded, semi-mature, ash and field maple along the Harrowby Lane boundary. The remaining boundaries are comprised of fragmented and overgrown sections of hawthorn, punctuated by occasional over-mature ash.

The land slopes from west to east and forms the lower to middle part of the ridge which runs to the east of Grantham. The site boundary however falls short of the ridge, and provides views across Grantham in a north-westerly direction. The site forms a generally consistent slope with the exception of a central area which projects slightly to form a 'headland'.

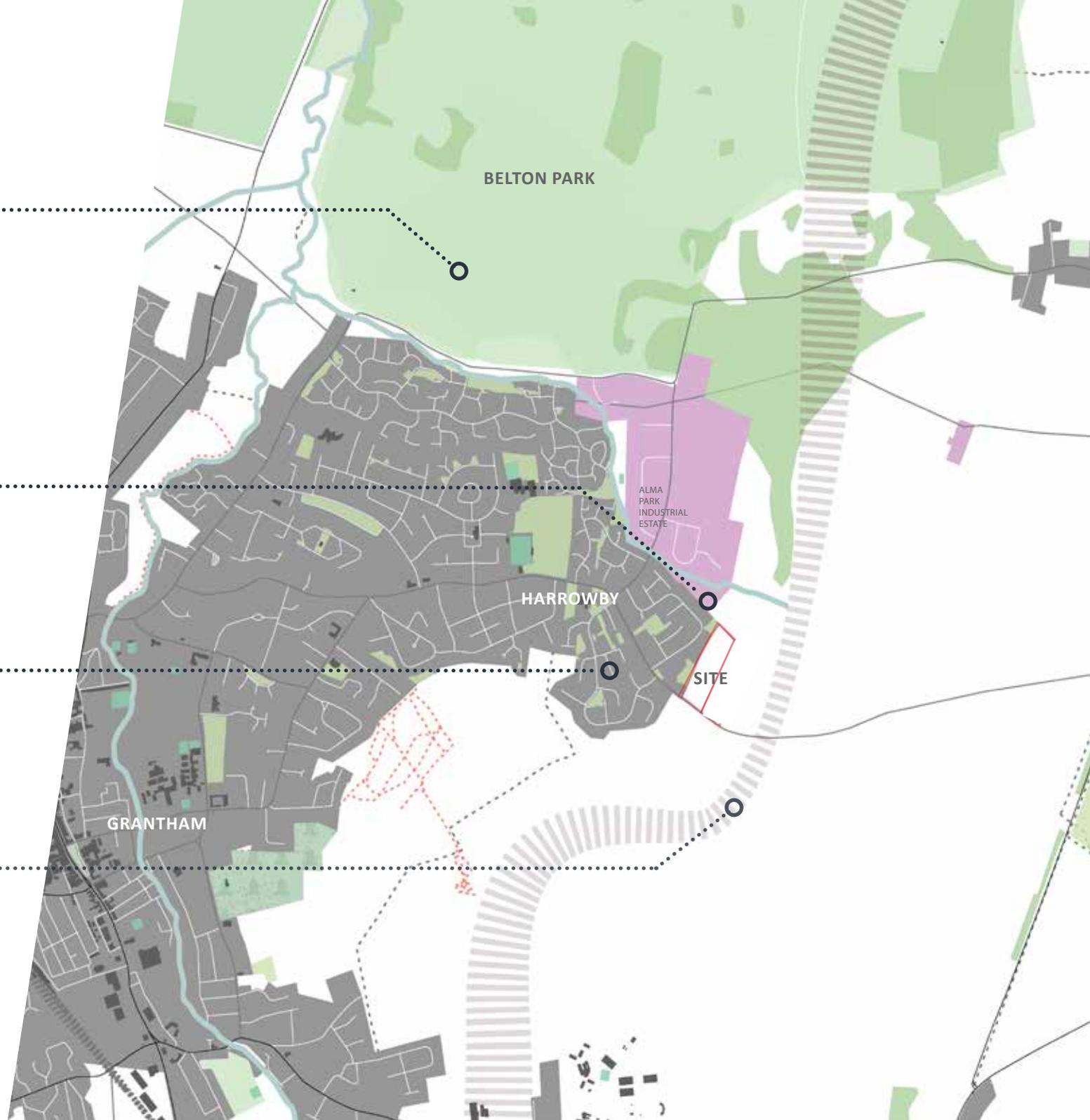
Site access can be obtained from three main points and there appears to have been gaps left within the adjoining 1970's housing development for the potential development of this site.

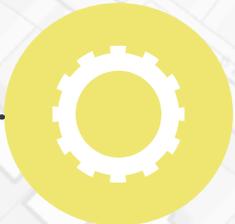
The local character along Harrowby Lane to the East is 1970s, 80s and 90s small to medium sized dwellings, offering medium to high density housing estates set on large loop roads and cul-de-sacs. The houses are located set within small to medium sized plots with generally small front and larger rear gardens. These dwellings are mainly two storey houses, interspersed with some bungalows.

Belton Park Golf Club is located c.1.5km from site and forms part of the Belton Park English Heritage Registered Park and Garden and which contains the Grade I listed Belton House.

To the North of the site sits a narrow strip of industrial buildings, Alma Park Industrial Estate.

The area around the site is on steadily rising land which plateaus around Canberra Crescent. The land then rises steeply to the East and South to form a ridge, covered by a mixture of open arable land and woodland.





SITE CONTEXT

# Local Character

The site is currently being used as pasture for grazing animals. Immediately to the west, the site predominately backs onto housing along Fifth Avenue with areas used for an informal children’s play area and a managed green embankment.

## Local Vernacular

In terms of the use of materials there is wide variation across the area, however, almost all would be generally considered as traditionally built; brick and tile. Brick is the predominant walling material throughout. There are many different colours, textures and finishes, from red, orange and buff bricks. Immediately to the west of the site along Ninth Avenue the houses are constructed from buff bricks with painted horizontal timber cladding.

Roofs are a mix of clay tile, either traditional plain tiles but mostly machine cut plain, or concrete interlocking tiles. There is the occasional use of modern pantile. Some natural slate survives to the older houses.

## Parks and Recreation

There is good provision of public open space throughout the area with a combination of pockets parks and green ways forming an integral part of new developments and aligned with a retained historic field boundaries and tree belts. The new development provides the opportunity to improve the access and surveillance to these spaces. There are large recreation and sports fields linked to schools, often with full public or semi-public access and connected by public rights of way.

## Trees and Hedges

There are only a few trees located within the site, with the highest concentration found along the boundaries to the north and south.

To the west, beyond the site boundary, there is a small informal managed green embankment with some mature ash and oak trees and overgrown hawthorn hedgerows. The site’s boundary comprises mainly hawthorn and bramble hedgerows, the vast majority of which are proposed to be retained and enhanced where appropriate.

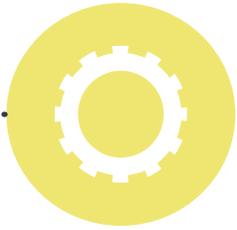
## Landscape Character

Landscape character is defined by the ridge which serves to enclose the urban realm and provides a sense of visual containment. Alma Wood provides woodland cover along the ridge north of site. Other dispersed field boundary trees and hedges form a verdant approach to the town from the south and provide a green backdrop to Grantham when viewed from the opposite side of the valley.

View from site looking down Fifth Avenue and one of the existing small recreational areas







SITE CONTEXT

# Technical Analysis

As part of the masterplanning process a range of technical issues have been reviewed to inform the design solution and quantum of development that is achievable on the site.

## Highways and Movement

There are no public rights of way through the site, however there is an existing right of way adjacent to the boundary to the north, accessed through the children's play area on the corner of Fifth Avenue.

Vehicular movement is along the primary highway towards High Dike and Grantham Town Centre with secondary routes feeding residential estates. Pedestrian and cycle routes are only provided via the adopted footways.

## Access

Site access can be obtained from three main points. At two locations off Fifth Avenue there are road spurs that end abruptly suggesting that there was once the plan to extend the adjoining 1970's housing development at a later stage. These spurs create undesirable dead ends with no frontage and there is great potential to integrate these into the development of this site to provide an improved urban edge to the estate.

## Drainage

Based upon an agreed set of assumptions a Quick Storage Estimate (QSE) has been calculated for both a 100 year and 30 year plus climate change event based on 5 l/s and 1 ha for each half of the site. This provides an approximate volume of storage required in the development of the site.

The masterplan layout has been developed to ensure that the amount of storage can be accommodated on site. The eventual drainage solution will be determined at a later stage but could include SUDS, swales, ponds, permeable paving, underground tanks or a combination the above.



The technical analysis demonstrates that the development is both deliverable and credible creating a robust evidence base to support its allocation in the South Kesteven Local Plan.

### Topography

The highest point of the site is along the eastern boundary and slopes down towards the western boundary by approximately 20m. The site is divided by a natural high ridge running east west. The masterplan has been based on an accurate topographical survey of the site and its surroundings.

### Amenity of Existing Dwellings

The site has dwellings located along the boundary to the West. These existing dwellings at the closest point are located approximate 12m from the site boundary, increasing to 25m as the dwellings move towards the South. Due to the potential level differences, proposed dwellings along this boundary are set back to avoid any unnecessary loss of privacy.

### Solar Orientation

Dwellings will predominately face East and West with gardens benefitting from the sun for much of the day. The position of the internal rooms should make the best use of the orientation.

### Utilities

There are two existing overhead power lines which run across and the site and along the boundary to the East. These cables are buried as they move towards the residential settlement and it is the intention that these will be buried within the site to facilitate any new development.

There is currently no gas supply to the site and no water mains across the site. The covered reservoir to the South East has a concentration of distribution pipes running parallel with Harrowby Lane.

### Foul Water

There are currently no sewerage services running across the site. The existing infrastructure to the West will allow for connections into the adopted network. These are either to the North at the corner of Fifth Avenue or to the South along Harrowby Lane. Both these locations work well with the site levels and prevent the need for pumping stations.



# Facilities and Amenities



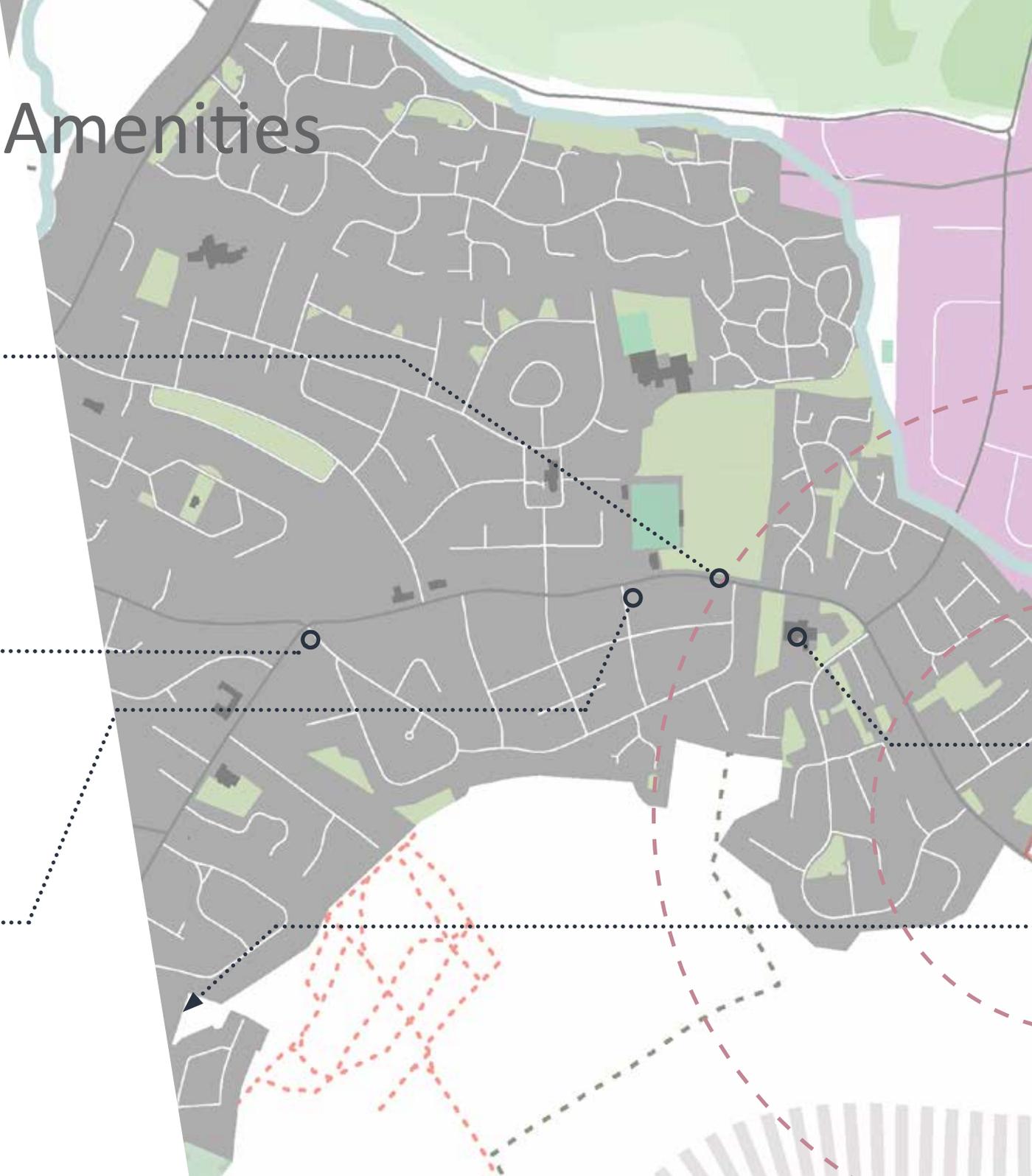
**LOCAL SHOPS**



**GRANTHAM HIGH STREET**



**SUPERMARKET**





**RECREATIONAL AMENITY**



**LOCAL OPEN SPACE**



**EMPLOYMENT**



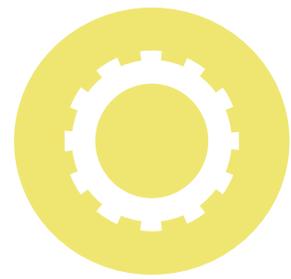
**EDUCATION**



**GRANTHAM TRAIN STATION**

There are a range of existing facilities, including Belmont Community Primary School, Harrowby C of E Infants School, Harrowby Lane Doctors Surgery, Harrowby Lane Methodist Church, Tesco Express, local shops and takeaways, public houses, a children's equipped play area and hard courts for football. These facilities are all within walking distance to the site and already serve the immediate neighbouring areas and will be available to the proposed development when it is completed.

The town centre is located approximately 2.5km away offering a variety of retail outlets, restaurants and cafes as well as Grantham Station which provides local and national rail services across the country.





PRINCIPLE OF  
DEVELOPMENT

# Planning Context

This section is intended to provide a strategic overview of planning policy and identify areas of common focus that can be brought through into a future planning application made for the site. The importance of the Development Plan is clear given the requirements of Section 38(6) of the 2004 Planning and Compulsory Purchase Act whereby all planning applications have to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Document	Relevant Policy/ Commentary
Grantham Townscape Assessment	<ul style="list-style-type: none"> <li>» The site lies to the edge of character area 7C – Londonthorpe and Harrowby Lane (east).</li> <li>» A notable characteristic of the area is the views to tree lined ridge to east and west. Mostly two storey and bungalow development, strong presence of trees, wide streets with grass verges. Much of the development is inward facing.</li> <li>» Post war housing with topography rises steadily to south and east. The area is not considered to be legible and lacks a sense of place. Many areas have dead frontages onto principal routes.</li> <li>» There are no statutory listed buildings and no designated conservation area within this character area.</li> <li>» Whilst the eastern edge is sensitive to change, where development maintains views limited expansion could be possible. Views should be retained to the ridgeline and buildings of an appropriate scale located in such a way so views are not impeded.</li> <li>» There are also opportunities to enhance green boundaries and urban edge of the area.</li> </ul>
South Kesteven Landscape Character Assessment (2007)	<ul style="list-style-type: none"> <li>» Area is defined a sensitive landscape area, although the particular areas of sensitivity includes Belton Park and protecting the gaps between Grantham and the adjacent villages.</li> <li>» Built development on higher scarp slopes or skylining should be avoided.</li> <li>» New development and structural landscape can be used to soften existing harsh urban edges.</li> <li>» Maintain a varied urban edge with fringes of countryside extending into the town.</li> <li>» Opportunities for enhanced access to the countryside around the edge of the town should be considered in development proposals.</li> <li>» Where existing development occurs on higher ground, tree planting proposals to soften the roofscapes on the skyline should be considered.</li> </ul>
Belton House Setting Study	<ul style="list-style-type: none"> <li>» Site not within the area that can be seen from the roof of Belton House.</li> <li>» Site not within area visible from first floor viewing platform of Bellmount Tower</li> <li>» Area visible from approach points and development in the foreground of these views classed as sensitive.</li> </ul>

Document	Relevant Policy/ Commentary
South Kesteven Landscape Sensitivity and Capacity Report (2011 and 2013)	<ul style="list-style-type: none"> <li>» The study relates to the landscape capacity of specific sites within the Grantham area. The document assesses the landscape capacity of sites and their suitability of development.</li> <li>» Some of those that are classed as sensitive to change and that have a low capacity for development have been assessed as suitable for housing within the 2015 SHLAA indicating that housing development could be accommodated on site subject to detailed development proposals coming forward.</li> <li>» The 2013 assessment included the review of some additional sites. This indicated that Study Area C Harlaxton Close – which is a similar scale to Harrowby Lane is designated as sensitive in the LCA and as a SAP is identified as having capacity for development.</li> <li>» Although partly covered by previous Local Plan Policy EN4 ‘Prominent Areas for Special Protection’ it is the higher, more steeply sloping fields rising to the ridge of high ground to the south that are prominent and more sensitive;</li> <li>» Views of the area are limited and there is scope for mitigating potential visual impact.</li> </ul>
AECOM Grantham Capacity and Limits to Growth Study	<p>The AECOM Report provides a very broad overview of the suitable directions for growth within the town and acknowledges its limitations in the suitability of development on smaller sites. It:</p> <ul style="list-style-type: none"> <li>» States “land identified as not suitable for development may have the potential to remain suitable for smaller scale development”</li> <li>» The site lies within “Area 2 – east of Grantham” and “Zone C”</li> <li>» The report highlights the land is Grade 3 agricultural land (although much of the last in the area is Grade 2).</li> <li>» Harrowby Lane identified as one of most suitable areas for development in terms of transport and accessibility.</li> <li>» Harrowby Lane identified as attractive cycling route.</li> <li>» Any development in this area to be promoted at Harrowby Lane / Somerby Hill.</li> <li>» The landscape sensitivity is highlighted, particularly to the setting of the town.</li> <li>» Highlights that there area high barriers to affordable housing which can be rectified through development.</li> </ul>

Name / Allocation Ref		Townscape Assessment 2011	Landscape Character Assessment 2007	Landscape Sensitivity and Capacity 2011	Landscape Sensitivity and Capacity 2013	Belton House Setting Study 2010
Northern Quadrant	GR3-H2 GR3-H3	<ul style="list-style-type: none"> <li>17b – Landscape Fringe – important views from Great Gonerby</li> <li>Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>Low and Medium Landscape Sensitivity.</li> <li>GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li><b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>Part of site visible from roof of Belton House</li> <li>Visible from Bellmount Tower</li> </ul>
Southern Quadrant	GR3-H1 GR3-H5	<ul style="list-style-type: none"> <li>17e – Landscape Fringe</li> <li>Green rim which <b>encircles</b> town deemed important</li> <li>Ecological issues and <b>landscape issues need to be treated with care.</b></li> <li>Very important archaeological remains.</li> </ul>	<ul style="list-style-type: none"> <li>Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>GR3-H5 is identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Not visible</li> </ul>
Manthorpe	GR3-H4	<ul style="list-style-type: none"> <li>17a – Landscape Fringe – <b>retain open setting of Manthorpe</b> and St John’s Church</li> <li>Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>GR3-H4 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li><b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>Part of site visible from roof of Belton House</li> <li>Visible from Bellmount Tower</li> <li>Visible from outside of park</li> </ul>
Southern Gateway Employment	GR-SE1	<ul style="list-style-type: none"> <li>17d – Landscape Fringe – open views in all directions.</li> <li>Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>Minor part of site <b>in Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>Minor part of site visible from roof of Belton House</li> </ul>
Low Road, Barrowby	LV-H3	<ul style="list-style-type: none"> <li>17c – Landscape Fringe</li> <li>Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>Identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Not visible</li> </ul>
Easthorpe Road, Great Gonerby	LV-H8	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li><b>Element 1 and 3 – Exceptionally / Very Sensitive to Major Development</b></li> <li>Visible from Bellmount Tower</li> </ul>



PRINCIPLE OF  
DEVELOPMENT

# Planning History

The purpose of this promotion document is to demonstrate that the land at Harrowby Lane is a technically sound site that can accommodate housing within short term to assist in meeting the housing needs of Grantham, as the main focus for growth within South Kesteven.

## Planning History

An outline application was submitted for the site in March 2017 for a residential development of up to 100 dwellings (Use Class C3) with associated access, open space, landscaping and infrastructure improvements (application ref: S17/0566).

On the 14th February 2018 the permission was refused for the following reasons:

1. Impact upon landscape;
2. Impact local heritage assets;
3. Absence of a sustainable drainage scheme;
4. Limited information in respect of a mineral assessment;
5. Unable to demonstrate that infrastructure required for the proposal would be provided;
6. Insufficient mitigation for the adjacent Alma Park Local Wildlife Site

Following this, an appeal was made on behalf of our client Absolute Property Development Ltd against South Kesteven District Council's decision to refuse planning permission on the site.

At the appeal the development was reduced from 100 units to up to 75 units in which a larger area of grassland would be retained, thereby addressing concerns about the effect of the proposal on the grassland habitat and the wider ecological network.

Following the submission of additional documentation in respect of drainage and mineral matters and revised section 106 agreement, the Council agreed as part of the Statement of Common Ground that these reasons for refusal were no longer contested, thus demonstrating the site is relatively unconstrained in terms of technical issues.

The two issues debated as part of the appeal were:

- 1) The effect of the proposal on the landscape character of Grantham;
- 2) The effect of the proposal on the setting of a number of designated heritage assets

The Inspector found that the proposed development would have a harmful effect on the landscape setting of the town, and that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets. For these reasons, the appeal was dismissed on 10th July 2019.

Following the appeal decision and recent conversations with South Kesteven District Council the client is looking to reduce the development on the site even further, as detailed on page 18-19.

Through the two options proposed as part of this Call for Sites submission, the impact on landscape character and setting of heritage assets is completely addressed, as set out in the adjacent table and detailed through the remainder of the Vision Document.

## Response as part of Application and Appeal

## Response as part of the Reduced Options (50 and 20 units)

<b>Transport</b>	The site is in an extremely sustainable location and well connected to local facilities and public transport. The traffic impact of the proposed development on the highway network was assessed and deemed to be very low. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Further reduce the impact on the local network given the smaller scheme, of either 50 or 20 dwellings.
<b>Access</b>	Vehicular, cycle and pedestrian access into the site is to be taken from Harrowby Lane was agreed as part of the outline application. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Access to remain the same as previous proposal.
<b>Drainage/ Flood Risk</b>	A revised drainage strategy (2018) was prepared by Curtins as part of the Appeal process. Lincolnshire County Council's Environment and Economy Directorate (LCC) agreed the it represented a sustainable drainage system (SuDS). The proposed drainage strategy also provides betterment through the provision of a filter drain type of arrangement to alleviate pre-existing surface water flooding issues. <b>There were no drainage or flood risk objections to the proposals as part of the Planning Application/Appeal.</b>	The reduced scheme still utilises the drainage strategy as agreed as part of the Appeal and so will represent a sustainable drainage system and benefit residents on lower ground.
<b>Minerals</b>	LCC agreed as part of the application and appeal process that the site is unsuitable for minerals extraction and that the development of the site would not sterilise land for future minerals extraction. <b>There were no minerals objections to the proposals as part of the Planning Application/Appeal.</b>	The same applies.
<b>Landscape</b>	<p>The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment</p> <p>It is our view the site forms a relatively small part of the landscape setting of Grantham and there are other areas of land such as the prominent Hall's Hill which contribute significantly more. The development was anticipated to have beneficial long term effects on the eastern edge of Grantham, through the visual continuation of woodland across the ridgeline and tiered planting throughout the development</p>	The reduced schemes detailed within this Vision Document would involve development on the lowest levels of the site only, containing the built visual envelope, which would have limited landscape impact, as acknowledged by the Appeal Decision (para 14).
<b>Heritage</b>	<p>The Inspector found that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets, bar Harrowby Hall and Arch.</p> <p>It should be noted that remaining heritage assets are located at a distance from the site, two of which had no intervisibility. The impact as such would be very minor and certainly less than many other approved schemes in Grantham. The Heritage Impact Statement stated that the development would not undermine heritage values.</p>	The reduced scheme detailed in this Vision Document would be located on the lowest levels of the slope meaning the visual impact and interface between the site and any heritage assets would be nil. The scheme has been designed to take into account the countours of the land and will sit behind the existing rooflines to liensure there will be no impact on long range views, including those from listed buildings.



PROPOSALS AT  
HARROWBY

# Proposals at Harrowby

The proposals have responded directly to the Inspector's comments made as part of the appeal (APP/E2530/W/18/3208890) where it was suggested at paragraph 14 that the lower levels of the site could form part of the visual envelope of the town and do not contribute to the open and natural appearance of landscape character.

As such, the this vision document presents 2 options for assessment as part of the Call for Sites that concentrate development on the lower slopes, working with the contours so that houses sit behind the existing built form and do not encroach up the slope.

The options will achieve an average density of approximately 15-22 dwellings per hectare which while low density, provides a balanced approach to housing and green space and responding to the existing context. The scale of the development will be predominately 2 storey. In terms of a variety in the heights and massing of the buildings, this is achieved through the use of a range of house types and sizes ranging from smaller 2 bed units to 4 bed plus bedroom houses.

This range of house types will also affect the massing by providing a change in the eaves and ridge height creating subtle changes in scale. Landmark buildings, focal points and a clear hierarchy of routes and intersections are considered to increase the legibility of development.

	OPTION 1	OPTION 2
<b>SITE AREA</b>	2.25 hectares	1.65 hectares
<b>AMOUNT</b>	50 Dwellings	25 dwellings
<b>SCALE</b>	1.5/2 storeys	1.5/2 storeys
<b>MIX</b>	2, 3 and 4 bedroom homes	2, 3 and 4 bedroom homes
<b>AFFORDABLE HOMES</b>	Policy compliant	Policy compliant
<b>PUBLIC BENEFITS</b>	<ul style="list-style-type: none"><li>• Boost supply of housing - in an area where a five year supply of housing land is not currently in place;</li><li>• Ecological enhancement - through retention of existing planting and new planting features;</li><li>• New public open space - including new areas of play;</li><li>• Improve access to Alma Wood;</li><li>• Creating a high quality built environment;</li><li>• Improvements to the existing drainage of the area;</li><li>• Contributions to services and infrastructure via S106</li></ul>	

**OPTION 1**

50 dwellings



**OPTION 2**

25 dwellings





PROPOSALS AT  
HARROWBY

# Design

The style of the new dwellings will respect and reflect the local architecture surrounding Grantham, which forms a strong link to Lincolnshire's rich rural history. The eventual design strategy will incorporate best practice design principles to ensure that dwellings are built to a high quality and standard. The layout ensures that privacy standards and the streetscape are not compromised through the topography of the site.

## Design

Houses are arranged to create an attractive setting of roof forms and vistas towards the site and within the site itself.

House layout and orientation will respond to its position within the site, the immediate topography and its position relative to footpaths, open areas and other carefully interlaced green spaces.

Pitched roofs with primary gable elevations will create interest and formality to the dwellings, especially when viewed as part of the streetscape. Careful and sensitive design of primary facades and a family of details for windows, entrances and recessed porches, will ensure the design forms its own identity without reverting to pastiche or imitation.

The architectural design as illustrated within the document is largely indicative, for the purpose of layout only. Further design development would need to take place to develop the architectural detail.

## Working with the Levels

Working closely with the existing levels, the dwellings have been positioned to coordinate with the contours by creating plateaus of development. This will allow for dwellings adjacent to the highway to remain predominately at the same level.

The spaces between the dwellings front to back are used to take up the difference in levels across the site. At the most extreme locations, split level dwellings and large landscaping zones will help to overcome these challenges.

## Relationships of Houses to Roads

In order to enclose space effectively, buildings will be sited close to the back edge of the public footway and this will require car parking to be sited between houses or within garages. This has the advantage of reducing the visual impact of on-site parked cars and to increase the amount of site area available for private rear gardens.

## Rear Privacy

Residents have high expectation of privacy from the private or garden side of the dwelling. In a medium density layout it should be possible to avoid any overlooking. Every effort has been made to avoid overlooking of rear facing living room windows. This has been achieved by considered design, building orientation, working with the existing site levels and innovative landscape led proposals.

## Garden Sizes

A minimum private rear garden of 75m<sup>2</sup> has been provided for all types of houses. This provision has been found to be an acceptable and workable minimum size that accommodates most household activities.

## Accessibility

All new dwellings should be able to be visited unassisted by disabled people as far as the entry to the dwelling. The 'Lifetime Homes' concept, will be adopted for an agreed percentage of the dwellings.

### Space Standards

Dwellings will be designed in accordance with the principals set out within the Technical Housing Standards- Nationally Described Space Standards to ensure the dwellings are of an appropriate size to create a viable and marketable development.

An element of affordable housing will be provided within the development in small clusters and could include social rented, shared ownership and low cost/reduced cost market housing.

### Daylight and Sunlight

Good natural light makes dwellings more attractive, pleasant and energy-efficient. The Housing layout will be designed to maximise daylight and sunlight to dwellings as far as possible, but not to the exclusion of other considerations, such as privacy or the achievement of an attractive streetscape.

Dwellings have been positioned a minimum of 21m apart, where dwellings are on an elevated platform these distances will increase to compensate. As a rule adjoining properties will not obstruct views above 20o from a horizontal position.

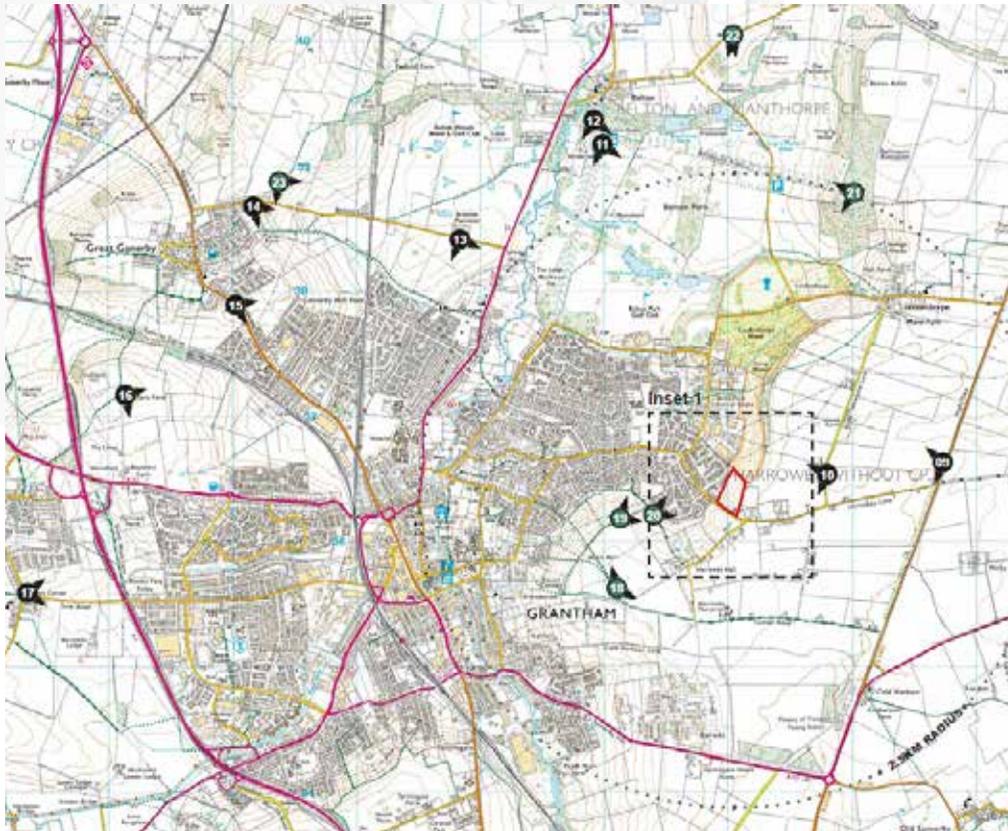




PROPOSALS AT  
HARROWBY

# Heritage & Landscape Impact

The revised scheme has been amended to take account of the comments made in the recent planning appeal, concentrating development on the lower levels of the site where it was considered it doesn't contribute to important landscape character (Inspectors Report, para 14). The revised scheme has been prepared to contain the visual envelope as demonstrated in these long range views, where development has been positioned to work with the contours so as to sit neatly behind the rooftops of existing built form and not



## Views to and from Heritage Assets

The following images identify the long range views to the site, the most significant of these is the designed landscape and setting of Belton House, some 3km north/northwest of the site.

The scheme has been revised so that there is no development punctuating the horizon when viewed from the roof of Belton House. Additionally, the Belton House Setting Study (2010) jointly commissioned by the National Trust and South Kesteven Council, shows that the proposed site is not within the zone of theoretical visibility as viewed from the roof of the house.

The site cannot be seen at all from Bellmount Tower and the reduction in built form means the site will not be experienced in views together with the Tower.

## Other Long Range Views

The other long range views are shown, many of which are glimpsed views from roads or public footpaths, with intervening vegetation. The revised scheme would retain the visual envelope with the development sitting neatly behind the rooftops of the existing built form and retaining the 'clearly defined rural hinterland' the Inspector refers to.

The site is not visible at all from the steps of Belton House



The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



The site is not visible at all from the steps of Belton House



13 View Looking South East from Belton Lane

FIGURE 28: Viewpoint 13

The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



14 View looking East South East from PRoW south of Belton Lane, Great Gonerby

FIGURE 29: Viewpoint 14

There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



17 View Looking East from Low Road, directly South of Barrowby

FIGURE 35: Viewpoint 17

	Planning Application and Appeal (100 units)	Option 1 (50 units)	Option 2 (25 units)
<b>Green Rim</b>	The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment	A further reduction in the number of dwellings and resultant stepping away from the highest point of the site would reduce the degree of visual intrusion.	Reducing the scale of development to 20 units means the majority of the site is located on the lowest level of the site with a significant proportion of the site undeveloped and/ or provision of open space.
<b>Belton House and RPG</b> Grade I Listed	The introduction of built development into a landscape seen in views from Belton House roof as almost pristine and undeveloped, would be of moderate harm the significance that Belton House and the RPG derive from this setting (para 30 Appeal Decision).	The reduced scheme of up to 50 units would mean that this development option would not be seen in views from Belton House roof.	The reduced scheme of up to 20 units would mean that this development option would not be seen in views from Belton House roof.
<b>Bellmount Tower</b> Grade II* Listed	There is no inter-visibility between the Tower and the site itself by virtue of the woodland and intervening curves in the escarpment. The development would however represent a small-scale change in the character of the wider context in which the Tower is experienced in some views (para 32 Appeal Decision).	The reduced scale of development, located in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptable change in which the Tower is experienced.	The reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptable change in which the Tower is experienced.
<b>Harrowby Hall and Arch</b> Grade II* Listed	These listed buildings are somewhat concealed by the fact that they are within a dip at the edge of the wider plateau and so “would not diminish the sense of rural approach and setting of these heritage assets to any great degree” (para 34 Appeal Decision).	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.
<b>St Wulfram’s Church</b> Grade I Listed	The development breaches the existing extent of built form on the eastern side of the town and includes development on the open green space above the settlement, impacting upon the rural setting of St Wulfram’s. However this to some degree was mitigated by the reduction in the scale of the proposal (para 36 Appeal Decision).	The reduced scale of development, located further in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptable change in which St Wulfram’s is experienced.	he reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptable change in which St Wulfram’s is experienced.



PROPOSALS AT  
HARROWBY

# Landscape Benefits and Connectivity

As a development Harrowby Lane aims to create a safe and inclusive extension to the existing residential area. There are huge opportunities to improve the urban edge in this location to make better use of land and create improved overlooking to address some of the concerns regarding antisocial behaviour that have been reported through previous consultations.

Key to establishing a 'heart' or centre to the scheme is creating a space with a high enough frequency of use that it becomes a place to go & enjoy the passive/active company of people.

This has been achieved through various spatial planning strategies. Firstly, the 'heart' is linear; running through the centre of the site from north to south. This aims to make a space that is easily accessible to every resident within the scheme.

Secondly, the linear space responds to present & anticipated future walking routes (potential popular future activity amongst residents due to the site's location, views, & proximity to Alma Woods). This aims to attract future & existing residents into the space - for their everyday and recreational journeys - thus achieving high usage & safer environment.

Thirdly, shared space streets & narrowed portions of the loop road create numerous possibilities for residents to move from the loop road, on the periphery of the site, into and across the shared recreational space in the centre. From the outset, this achieves safer pedestrian movement due to the design's prioritising of people.

Finally, the design of the space itself achieves a sense of openness due to its proportions, and yet critically has a density of use that makes the 'heart' of the scheme lively and animated.

***There is also the opportunity to provide a more direct route to Alma Woods that is green, attractive links into the wider 'Reconnecting Grantham to its Heritage' project that the Woodland Trust and National Trust are promoting through Heritage Lottery funding.***

Initial conversations have been held with Ian Froggatt at the Woodland Trust regarding the creation of sustainable footpaths to the woods, along with tree planting should an application be approved.





PROPOSALS AT  
HARROWBY

# Transport, Access and Parking

Curtins Consulting has played a key role in the evolution of the masterplan proposals to ensure that the transport, access and parking solutions to the site are deliverable. The site is highly sustainable offering a wide range of sustainable transport choices expected trip generation of the development is expected to be negligible on the local highway network.

## Access and Highways Layout

Site access will be located on Harrowby Lane and to consist of a simple priority junction with 2.4m x 43m visibility splay as set out in Manual for Streets. To accommodate the access junction and to reflect the definable change in characteristic of Harrowby Lane, the 30mph speed limit is to be extended past the site. This will also aid road safety.

The highway layout within the site has been developed to make vulnerable road users the priority through the use of shared surface areas, speed plateaus at all junctions and the use of off road paths throughout the site and linking to adjoining areas;

The site is permeable for pedestrians and cyclists allowing movement towards the Fifth Avenue area and towards the open country through rather than around the site.

## Parking Strategy

Many of the new dwellings will be served with on plot parking generally located to the side, front or rear of the dwelling. Parking spaces and garages will be sited so that there is sufficient room for users to enter and exit the vehicle. The distance from the car parking space to the home will be kept to a minimum and will be level or gently sloping. Disabled parking and cycling parking numbers will be provided in accordance with the appropriate standards.

## Traffic Generation

Traffic generation from the expected level of development would be x 2 way vehicle trips in the morning peak and x 2 way vehicle trips in the evening peak. This level of traffic generation would have no significant effect on local highway capacity.

## Servicing and Refuse Collection

The masterplan layout and highways design has been reviewed at a strategic level to ensure that servicing and refuse collection to the properties can be adequately achieved.



The site is permeable for pedestrians and cyclists and the design developed to make vulnerable road users a priority.

Car and cycle parking will predominately be on plot. In some areas courtyard car parking is proposed in line with best practice design principles.

New priority junction off Harrowby Lane will serve the development in line with the design requirements set out within the Manual for Streets.





PROPOSALS AT  
HARROWBY

# Biodiversity

The development will be able to deliver significant ecological benefit to the wider area, providing additional habitat and foraging potential for local wildlife, as well as linkages between fragmented wildlife communities.

It is anticipated that the improvements to landscape infrastructure will make a significant contribution to local wildlife habitats through the following ways:

- greatly increase the acreage devoted to planting;
- diversify the existing monotone nature of unimproved grassland;
- introduce new habitat typologies, with the introduction of wildflower meadow, standing water and associated marginal planting;
- improve now degraded elements such as over-mature and damaged boundary tree and hedge planting;
- Use a planting matrix with species indigenous to the local area, improving biodiversity;
- Create wildlife corridors between fragmented habitats, linking for example Alma Wood with the roadside verge and established hedgerow of the unclassified road south-east of the site.



Improve site-wide biodiversity, creating wildlife corridors and connecting fragmented wildlife communities

Broaden the diversity of wildlife habitats with the introduction of standing water, marginal planting and wildflower meadow

Use a palette of local native meadow, herb, shrub and tree species to improve biodiversity and reinforce local landscape character





PROPOSALS AT  
HARROWBY

# Drainage

The development will be able to deliver a sustainable urban drainage system, providing a suitable onsite drainage scheme as well as providing betterment to the pre-existing

## Drainage

A revised drainage strategy was prepared by Curtins in response to the LLFA comments and whilst the final drainage solution will be determined at a later stage, Lincolnshire County Council's Environment and Economy Directorate (LCC) have agreed to the principle of the drainage scheme as proposed.

The revised masterplan layout has been developed to ensure that the amount of storage can still be accommodated on site.

## Surface Water Design

Under the concept design, the surface water runoff and roofline drainage from the proposed development could discharge as follows:

- Provision of permeable driveways and swales as part of a sustainable drainage system (SuDS).
- Discharge rates can be restricted to Greenfield runoff rates of 5l/s/ha;
- Flow rates to be provided by installed flow restriction devices including SuDS basins and a cut off land drain across the eastern proportion of the site.

## Foul Water Drainage

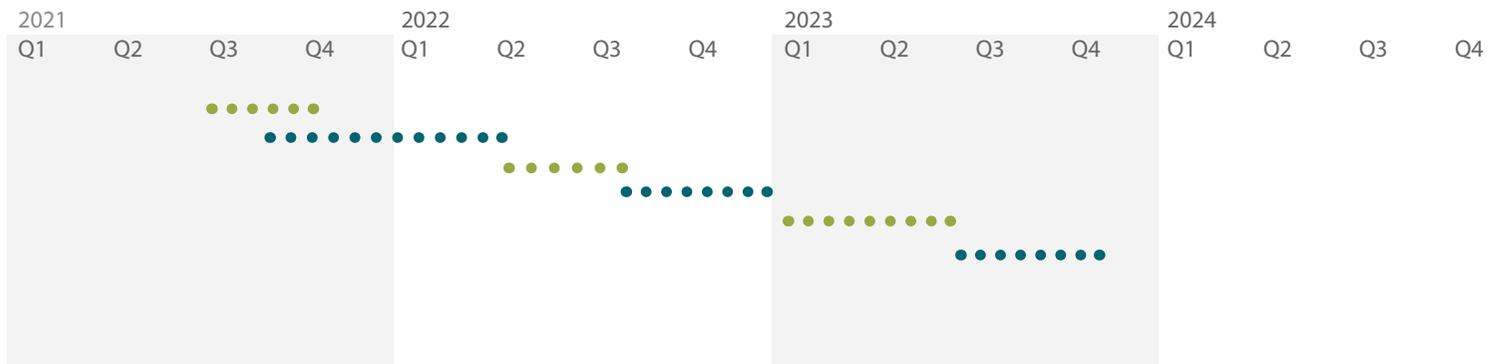
There is no existing foul water drainage on site. The development is proposed to connect to public sewers in the vicinity of the site at Harrowby Lane.



# Next Steps

## A short-term deliverable site

- Local Plan Preferred Options
- Outline Planning Application
- Appoint Builder / Contractor
- Reserved Matters Application
- Start Infrastructure Works
- Finalise Development





CONCLUSIONS

This vision document sets out how development can be delivered on the site which, following evaluation clearly represents an excellent candidate for allocation within the current planning context for the following reasons:

- » The site is available for development and can make a contribution of the district's short term land supply.
- » The site provides an extension of existing development, providing the opportunity to better integrate the existing housing to the countryside.
- » The site promotes quality housing that will meet the needs of the area and local residents.
- » Whilst there are challenges, these can be overcome through careful design and mitigation to provide a development that is a true asset to Grantham.

In short, the site has potential to deliver a well integrated, sustainable, mixed and positive residential addition to Grantham. We look therefore look forward to working with SKDC further to deliver development on the site.



DELIVERY

In terms of delivery, an indicative programme for the development of the site is provided below. This shows that the intention is to submit and progress the necessary planning permissions in tandem with the Local Plan preparation process. The landowner has current relationships with regional and national contractors who will be appointed once the principle of development is established through an outline planning application.

The roads and infrastructure would be installed followed by a phased development. The landowner is committed to the short-term delivery of the site with the intention that the site could make an early contribution to the housing numbers required by the District.



INVOLVEMENT

The proposal from the outset has been subject to meaningful engagement with the Council and prepared in the context of good practice guidance contained with the 2011 Localism Act, 2012 National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).

It is recognised that overall community input is key and that future matters of the approach to consultation will look to be agreed with SKDC. The design of the proposals will be discussed with key stakeholders including the Council, Grantham Civic Society, Londonthorpe and Harrowby Without Parish Council and local residents and we look forward to working with them over the coming years.



EVIDENCE BASE

Overall, it is well established that development plans need to be; positively prepared, justified, effective and consistent with national policy. Further, in order to include sites within SKDC land supply the sites need to be deliverable and developable (paragraph 47, footnote 11).

Following on from the call for sites submission, this vision document can be seen as the first step towards demonstrating and supporting the council in meeting the above criteria. It has sought to understand the traffic and access impact, ground conditions, landscape and heritage sensitivities and drainage implications alongside and to inform the detailed masterplan. Work to date therefore that the site is deliverable and developable following a masterplanning exercise to determine site capacity. The intention to build on this document effectively building the site's evidence base, guided future discussions with future iterations produced as required.



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# Harrowby Lane Grantham Vision Document

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# Harrowby Lane

Vision Document for a deliverable, sensitive extension to Harrowby



# Harrowby Lane

The vision for Harrowby Lane is set out as a series of design principles that together establish a high quality extension to the Harrowby neighbourhood of Grantham.

The proposals will help create an improved urban edge to the town and deliver between 20-50 new family homes in line with the housing needs of the area.

## LEGEND

- Public Space
- Private Gardens
- Water Retention
- Roadways
- Shared Access
- Shared Road
- Decking

## Vision

The Local Plan Review for South Kesteven provides an ideal opportunity to consider new sites for growth within the District. Major growth continues to be promoted within Grantham as a key economic centre not only within Lincolnshire, but sub regionally.

As highlighted in the recent Inspector's Report, a range of sites will clearly be required to deliver this growth through a combination of town centre sites, the major urban extensions and sustainably placed urban fringe locations.

Harrowby Lane has a long planning history and as such a wealth of information is available to support its development. This Vision Document outlines two proposals for the smaller and medium scale development of the site. Both options have been carefully designed within the existing contours of the land to ensure that landscape impact is minimal. The land at Harrowby Lane offers many benefits, including:

### A sustainable location

The neighbourhood will be well connected by bus to Grantham town centre and the wider public transport network to further reduce dependence on the private car.

### New homes with a strong identity

Harrowby Lane will have a strong identity and sense of place that reflects its urban fringe location. New development, together with existing homes and facilities will add to the well serviced neighbourhood.

### Landscape led design

New green infrastructure, incorporating and building upon the existing ecology, will provide coherent connections & form an attractive, well managed landscape setting for the new homes whilst providing opportunity for active leisure & play in a natural environment.

### Connections and Access to Local Area and Wider Countryside

The existing network of footpaths, cycleways & roads will provide convenient connections to Alma Wood, local education & play facilities including nearby shops.



# Content

## Introduction

This document has been prepared to support the allocation of land at Harrowby Lane for the development of approximately 25-50 dwellings on the eastern edge of Grantham.

The document has been prepared the following team of consultants:

- » Savills (UK) Ltd – Planning and Heritage
- » ArkleBoyce Architects - Architecture, Masterplanning and Urban Design
- » Urban Wilderness – Landscape Architecture
- » Curtins – Transport, Access, Drainage and Ground Conditions

From analysis and evaluation of the land it is evident that the site has the potential to create a deliverable, developable and sustainable scheme.

## Purpose

The purpose of this document is to consider the capacity and technical ability to deliver growth at the land at Harrowby Lane, on the eastern edge of Grantham ('the site') and evidence how sustainable development could be delivered, taking into account the most recent appeal decision for the site.

The Vision Document considers how development on the site could come forward in line with the growth aspirations of South Kesteven. The document considers:

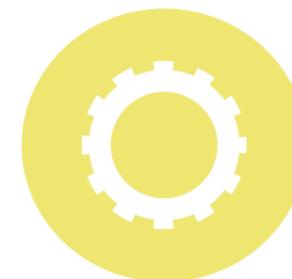
- » The site, its setting, placing it in the wider setting of Grantham
- » The technical challenges of delivering development on site, including landscape and visual impacts, heritage impact, topography, drainage, highways and ground conditions.
- » A vision and concept framework for sustainable development for the site.

## Background

Grantham is the main focus for growth within the area over the next 20 years as the key economic centre within the District. Given the level of growth required within and around the town the nature of the urban area and surroundings will change dramatically over the next 20 years. A range of housing sites of varying scales are required to achieve the growth and ensure that there is adequate and unconstrained land for development available to the market.

This document has been produced as part of the SKDC Call for Sites consultation and follows from a planning application and subsequent appeal made on the land.

The issues raised by the appeal have been thoroughly assessed and through the technical analysis a reduced scheme has been prepared addressing the landscape and heritage issues in full and the resulting revised scheme is submitted for consideration.



SITE  
CONTEXT



PRINCIPLE OF  
DEVELOPMENT



A SENSITIVE EDGE TO  
HARROWBY



SITE CONTEXT

# Location

The site is positioned on the eastern edge of Grantham on Harrowby Lane. The site abuts existing development in the form of 1970's sub-urban housing which is low to medium density. This housing is characterised by the significant green spaces and generous proportions given to the primary (loop) roads running through the site.

This is partly due to the change in level experienced by some of the housing, although the layout of the development is similar in areas where the topography is much flatter.

The site itself is greenfield and is currently used to graze livestock. The land is enclosed by established hawthorn hedging and self-seeded, semi-mature, ash and field maple along the Harrowby Lane boundary. The remaining boundaries are comprised of fragmented and overgrown sections of hawthorn, punctuated by occasional over-mature ash.

The land slopes from west to east and forms the lower to middle part of the ridge which runs to the east of Grantham. The site boundary however falls short of the ridge, and provides views across Grantham in a north-westerly direction. The site forms a generally consistent slope with the exception of a central area which projects slightly to form a 'headland'.

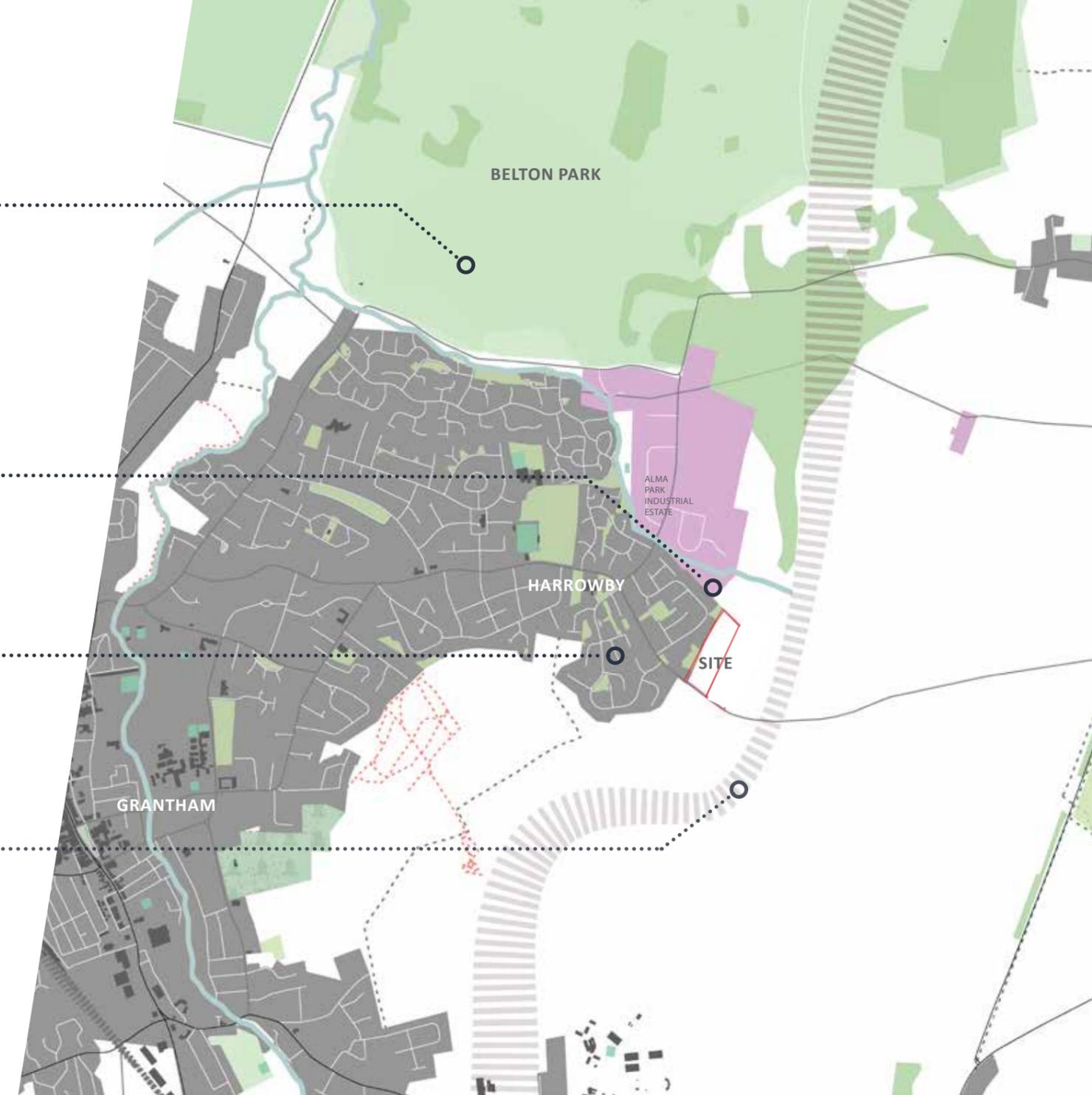
Site access can be obtained from three main points and there appears to have been gaps left within the adjoining 1970's housing development for the potential development of this site.

The local character along Harrowby Lane to the East is 1970s, 80s and 90s small to medium sized dwellings, offering medium to high density housing estates set on large loop roads and cul-de-sacs. The houses are located set within small to medium sized plots with generally small front and larger rear gardens. These dwellings are mainly two storey houses, interspersed with some bungalows.

Belton Park Golf Club is located c.1.5km from site and forms part of the Belton Park English Heritage Registered Park and Garden and which contains the Grade I listed Belton House.

To the North of the site sits a narrow strip of industrial buildings, Alma Park Industrial Estate.

The area around the site is on steadily rising land which plateaus around Canberra Crescent. The land then rises steeply to the East and South to form a ridge, covered by a mixture of open arable land and woodland.





SITE CONTEXT

# Local Character

The site is currently being used as pasture for grazing animals. Immediately to the west, the site predominately backs onto housing along Fifth Avenue with areas used for an informal children’s play area and a managed green embankment.

### Local Vernacular

In terms of the use of materials there is wide variation across the area, however, almost all would be generally considered as traditionally built; brick and tile. Brick is the predominant walling material throughout. There are many different colours, textures and finishes, from red, orange and buff bricks. Immediately to the west of the site along Ninth Avenue the houses are constructed from buff bricks with painted horizontal timber cladding.

Roofs are a mix of clay tile, either traditional plain tiles but mostly machine cut plain, or concrete interlocking tiles. There is the occasional use of modern pantile. Some natural slate survives to the older houses.

### Parks and Recreation

There is good provision of public open space throughout the area with a combination of pockets parks and green ways forming an integral part of new developments and aligned with a retained historic field boundaries and tree belts. The new development provides the opportunity to improve the access and surveillance to these spaces. There are large recreation and sports fields linked to schools, often with full public or semi-public access and connected by public rights of way.

### Trees and Hedges

There are only a few trees located within the site, with the highest concentration found along the boundaries to the north and south.

To the west, beyond the site boundary, there is a small informal managed green embankment with some mature ash and oak trees and overgrown hawthorn hedgerows. The site’s boundary comprises mainly hawthorn and bramble hedgerows, the vast majority of which are proposed to be retained and enhanced where appropriate.

### Landscape Character

Landscape character is defined by the ridge which serves to enclose the urban realm and provides a sense of visual containment. Alma Wood provides woodland cover along the ridge north of site. Other dispersed field boundary trees and hedges form a verdant approach to the town from the south and provide a green backdrop to Grantham when viewed from the opposite side of the valley.

View from site looking down Fifth Avenue and one of the existing small recreational areas





# Technical Analysis

As part of the masterplanning process a range of technical issues have been reviewed to inform the design solution and quantum of development that is achievable on the site.

## Highways and Movement

There are no public rights of way through the site, however there is an existing right of way adjacent to the boundary to the north, accessed through the children's play area on the corner of Fifth Avenue.

Vehicular movement is along the primary highway towards High Dike and Grantham Town Centre with secondary routes feeding residential estates. Pedestrian and cycle routes are only provided via the adopted footpaths.

## Access

Site access can be obtained from three main points. At two locations off Fifth Avenue there are road spurs that end abruptly suggesting that there was once the plan to extend the adjoining 1970's housing development at a later stage. These spurs create undesirable dead ends with no frontage and there is great potential to integrate these into the development of this site to provide an improved urban edge to the estate.

## Drainage

Based upon an agreed set of assumptions a Quick Storage Estimate (QSE) has been calculated for both a 100 year and 30 year plus climate change event based on 5 l/s and 1 ha for each half of the site. This provides an approximate volume of storage required in the development of the site.

The masterplan layout has been developed to ensure that the amount of storage can be accommodated on site. The eventual drainage solution will be determined at a later stage but could include SUDS, swales, ponds, permeable paving, underground tanks or a combination the above.



The technical analysis demonstrates that the development is both deliverable and credible creating a robust evidence base to support its allocation in the South Kesteven Local Plan.

## Topography

The highest point of the site is along the eastern boundary and slopes down towards the western boundary by approximately 20m. The site is divided by a natural high ridge running east west. The masterplan has been based on an accurate topographical survey of the site and its surroundings.

## Amenity of Existing Dwellings

The site has dwellings located along the boundary to the West. These existing dwellings at the closest point are located approximate 12m from the site boundary, increasing to 25m as the dwellings move towards the South. Due to the potential level differences, proposed dwellings along this boundary are set back to avoid any unnecessary loss of privacy.

## Solar Orientation

Dwellings will predominately face East and West with gardens benefitting from the sun for much of the day. The position of the internal rooms should make the best use of the orientation.

## Utilities

There are two existing overhead power lines which run across and the site and along the boundary to the East. These cables are buried as they move towards the residential settlement and it is the intention that these will be buried within the site to facilitate any new development.

There is currently no gas supply to the site and no water mains across the site. The covered reservoir to the South East has a concentration of distribution pipes running parallel with Harrowby Lane.

## Foul Water

There are currently no sewerage services running across the site. The existing infrastructure to the West will allow for connections into the adopted network. These are either to the North at the corner of Fifth Avenue or to the South along Harrowby Lane. Both these locations work well with the site levels and prevent the need for pumping stations.



# Facilities and Amenities



LOCAL SHOPS



GRANTHAM HIGH STREET



SUPERMARKET



RECREATIONAL AMENITY



LOCAL OPEN SPACE



EMPLOYMENT



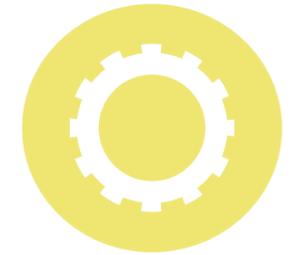
EDUCATION



GRANTHAM TRAIN STATION

There are a range of existing facilities, including Belmont Community Primary School, Harrowby C of E Infants School, Harrowby Lane Doctors Surgery, Harrowby Lane Methodist Church, Tesco Express, local shops and takeaways, public houses, a children's equipped play area and hard courts for football. These facilities are all within walking distance to the site and already serve the immediate neighbouring areas and will be available to the proposed development when it is completed.

The town centre is located approximately 2.5km away offering a variety of retail outlets, restaurants and cafes as well as Grantham Station which provides local and national rail services across the country.





PRINCIPLE OF DEVELOPMENT

# Planning Context

This section is intended to provide a strategic overview of planning policy and identify areas of common focus that can be brought through into a future planning application made for the site. The importance of the Development Plan is clear given the requirements of Section 38(6) of the 2004 Planning and Compulsory Purchase Act whereby all planning applications have to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Document	Relevant Policy/ Commentary	Document	Relevant Policy/ Commentary
Grantham Townscape Assessment	<ul style="list-style-type: none"> <li>» The site lies to the edge of character area 7C – Londonthorpe and Harrowby Lane (east).</li> <li>» A notable characteristic of the area is the views to tree lined ridge to east and west. Mostly two storey and bungalow development, strong presence of trees, wide streets with grass verges. Much of the development is inward facing.</li> <li>» Post war housing with topography rises steadily to south and east. The area is not considered to be legible and lacks a sense of place. Many areas have dead frontages onto principal routes.</li> <li>» There are no statutory listed buildings and no designated conservation area within this character area.</li> <li>» Whilst the eastern edge is sensitive to change, where development maintains views limited expansion could be possible. Views should be retained to the ridgeline and buildings of an appropriate scale located in such a way so views are not impeded.</li> <li>» There are also opportunities to enhance green boundaries and urban edge of the area.</li> </ul>	South Kesteven Landscape Sensitivity and Capacity Report (2011 and 2013)	<ul style="list-style-type: none"> <li>» The study relates to the landscape capacity of specific sites within the Grantham area. The document assesses the landscape capacity of sites and their suitability of development.</li> <li>» Some of those that are classed as sensitive to change and that have a low capacity for development have been assessed as suitable for housing within the 2015 SHLAA indicating that housing development could be accommodated on site subject to detailed development proposals coming forward.</li> <li>» The 2013 assessment included the review of some additional sites. This indicated that Study Area C Harlaxton Close – which is a similar scale to Harrowby Lane is designated as sensitive in the LCA and as a SAP is identified as having capacity for development.</li> <li>» Although partly covered by previous Local Plan Policy EN4 ‘Prominent Areas for Special Protection’ it is the higher, more steeply sloping fields rising to the ridge of high ground to the south that are prominent and more sensitive;</li> <li>» Views of the area are limited and there is scope for mitigating potential visual impact.</li> </ul>
South Kesteven Landscape Character Assessment (2007)	<ul style="list-style-type: none"> <li>» Area is defined a sensitive landscape area, although the particular areas of sensitivity includes Belton Park and protecting the gaps between Grantham and the adjacent villages.</li> <li>» Built development on higher scarp slopes or skylining should be avoided.</li> <li>» New development and structural landscape can be used to soften existing harsh urban edges.</li> <li>» Maintain a varied urban edge with fringes of countryside extending into the town.</li> <li>» Opportunities for enhanced access to the countryside around the edge of the town should be considered in development proposals.</li> <li>» Where existing development occurs on higher ground, tree planting proposals to soften the roofscapes on the skyline should be considered.</li> </ul>	AECOM Grantham Capacity and Limits to Growth Study	<p>The AECOM Report provides a very broad overview of the suitable directions for growth within the town and acknowledges its limitations in the suitability of development on smaller sites. It:</p> <ul style="list-style-type: none"> <li>» States “land identified as not suitable for development may have the potential to remain suitable for smaller scale development”</li> <li>» The site lies within “Area 2 – east of Grantham” and “Zone C”</li> <li>» The report highlights the land is Grade 3 agricultural land (although much of the last in the area is Grade 2).</li> <li>» Harrowby Lane identified as one of most suitable areas for development in terms of transport and accessibility.</li> <li>» Harrowby Lane identified as attractive cycling route.</li> <li>» Any development in this area to be promoted at Harrowby Lane / Somerby Hill.</li> <li>» The landscape sensitivity is highlighted, particularly to the setting of the town.</li> <li>» Highlights that there area high barriers to affordable housing which can be rectified through development.</li> </ul>
Belton House Setting Study	<ul style="list-style-type: none"> <li>» Site not within the area that can be seen from the roof of Belton House.</li> <li>» Site not within area visible from first floor viewing platform of Bellmount Tower</li> <li>» Area visible from approach points and development in the foreground of these views classed as sensitive.</li> </ul>		

Name / Allocation Ref	Townscape Assessment 2011	Landscape Character Assessment 2007	Landscape Sensitivity and Capacity 2011	Landscape Sensitivity and Capacity 2013	Belton House Setting Study 2010	
Northern Quadrant	GR3-H2 GR3-H3	<ul style="list-style-type: none"> <li>• 17b – Landscape Fringe – important views from Great Gonerby</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Low and Medium Landscape Sensitivity.</li> <li>• GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Part of site visible from roof of Belton House</li> <li>• Visible from Bellmount Tower</li> </ul>
Southern Quadrant	GR3-H1 GR3-H5	<ul style="list-style-type: none"> <li>• 17e – Landscape Fringe</li> <li>• Green rim which <b>encircles</b> town deemed important</li> <li>• Ecological issues and <b>landscape issues need to be treated with care.</b></li> <li>• Very important archaeological remains.</li> </ul>	<ul style="list-style-type: none"> <li>• Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H5 is identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not visible</li> </ul>
Manthorpe	GR3-H4	<ul style="list-style-type: none"> <li>• 17a – Landscape Fringe – <b>retain open setting of Manthorpe</b> and St John’s Church</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H4 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Part of site visible from roof of Belton House</li> <li>• Visible from Bellmount Tower</li> <li>• Visible from outside of park</li> </ul>
Southern Gateway Employment	GR-SE1	<ul style="list-style-type: none"> <li>• 17d – Landscape Fringe – open views in all directions.</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Minor part of site in <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Minor part of site visible from roof of Belton House</li> </ul>
Low Road, Barrowby	LV-H3	<ul style="list-style-type: none"> <li>• 17c – Landscape Fringe</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not visible</li> </ul>
Easthorpe Road, Great Gonerby	LV-H8	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 and 3 – Exceptionally / Very Sensitive to Major Development</b></li> <li>• Visible from Bellmount Tower</li> </ul>



PRINCIPLE OF DEVELOPMENT

# Planning History

The purpose of this promotion document is to demonstrate that the land at Harrowby Lane is a technically sound site that can accommodate housing within short term to assist in meeting the housing needs of Grantham, as the main focus for growth within South Kesteven.

## Planning History

An outline application was submitted for the site in March 2017 for a residential development of up to 100 dwellings (Use Class C3) with associated access, open space, landscaping and infrastructure improvements (application ref: S17/0566).

On the 14th February 2018 the permission was refused for the following reasons:

1. Impact upon landscape;
2. Impact local heritage assets;
3. Absence of a sustainable drainage scheme;
4. Limited information in respect of a mineral assessment;
5. Unable to demonstrate that infrastructure required for the proposal would be provided;
6. Insufficient mitigation for the adjacent Alma Park Local Wildlife Site

Following this, an appeal was made on behalf of our client Absolute Property Development Ltd against South Kesteven District Council's decision to refuse planning permission on the site.

At the appeal the development was reduced from 100 units to up to 75 units in which a larger area of grassland would be retained, thereby addressing concerns about the effect of the proposal on the grassland habitat and the wider ecological network.

Following the submission of additional documentation in respect of drainage and mineral matters and revised section 106 agreement, the Council agreed as part of the Statement of Common Ground that these reasons for refusal were no longer contested, thus demonstrating the site is relatively unconstrained in terms of technical issues.

The two issues debated as part of the appeal were:

- 1) The effect of the proposal on the landscape character of Grantham;
- 2) The effect of the proposal on the setting of a number of designated heritage assets

The Inspector found that the proposed development would have a harmful effect on the landscape setting of the town, and that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets. For these reasons, the appeal was dismissed on 10th July 2019.

Following the appeal decision and recent conversations with South Kesteven District Council the client is looking to reduce the development on the site even further, as detailed on page 18-19.

Through the two options proposed as part of this Call for Sites submission, the impact on landscape character and setting of heritage assets is completely addressed, as set out in the adjacent table and detailed through the remainder of the Vision Document.

## Response as part of Application and Appeal

## Response as part of the Reduced Options (50 and 20 units)

<b>Transport</b>	The site is in an extremely sustainable location and well connected to local facilities and public transport. The traffic impact of the proposed development on the highway network was assessed and deemed to be very low. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Further reduce the impact on the local network given the smaller scheme, of either 50 or 20 dwellings.
<b>Access</b>	Vehicular, cycle and pedestrian access into the site is to be taken from Harrowby Lane was agreed as part of the outline application. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Access to remain the same as previous proposal.
<b>Drainage/ Flood Risk</b>	A revised drainage strategy (2018) was prepared by Curtins as part of the Appeal process. Lincolnshire County Council's Environment and Economy Directorate (LCC) agreed the it represented a sustainable drainage system (SuDS). The proposed drainage strategy also provides betterment through the provision of a filter drain type of arrangement to alleviate pre-existing surface water flooding issues. <b>There were no drainage or flood risk objections to the proposals as part of the Planning Application/Appeal.</b>	The reduced scheme still utilises the drainage strategy as agreed as part of the Appeal and so will represent a sustainable drainage system and benefit residents on lower ground.
<b>Minerals</b>	LCC agreed as part of the application and appeal process that the site is unsuitable for minerals extraction and that the development of the site would not sterilise land for future minerals extraction. <b>There were no minerals objections to the proposals as part of the Planning Application/Appeal.</b>	The same applies.
<b>Landscape</b>	The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment  It is our view the site forms a relatively small part of the landscape setting of Grantham and there are other areas of land such as the prominent Hall's Hill which contribute significantly more. The development was anticipated to have beneficial long term effects on the eastern edge of Grantham, through the visual continuation of woodland across the ridgeline and tiered planting throughout the development	The reduced schemes detailed within this Vision Document would involve development on the lowest levels of the site only, containing the built visual envelope, which would have limited landscape impact, as acknowledged by the Appeal Decision (para 14).
<b>Heritage</b>	The Inspector found that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets, bar Harrowby Hall and Arch.  It should be noted that remaining heritage assets are located at a distance from the site, two of which had no intervisibility. The impact as such would be very minor and certainly less than many other approved schemes in Grantham. The Heritage Impact Statement stated that the development would not undermine heritage values.	The reduced scheme detailed in this Vision Document would be located on the lowest levels of the slope meaning the visual impact and interface between the site and any heritage assets would be nil. The scheme has been designed to take into account the contours of the land and will sit behind the existing rooflines to ensure there will be no impact on long range views, including those from listed buildings.



PROPOSALS AT HARROWBY

# Proposals at Harrowby

The proposals have responded directly to the Inspector's comments made as part of the appeal (APP/E2530/W/18/3208890) where it was suggested at paragraph 14 that the lower levels of the site could form part of the visual envelope of the town and do not contribute to the open and natural appearance of landscape character.

As such, the this vision document presents 2 options for assessment as part of the Call for Sites that concentrate development on the lower slopes, working with the contours so that houses sit behind the existing built form and do not encroach up the slope.

The options will achieve an average density of approximately 15-22 dwellings per hectare which while low density, provides a balanced approach to housing and green space and responding to the existing context. The scale of the development will be predominately 2 storey. In terms of a variety in the heights and massing of the buildings, this is achieved through the use of a range of house types and sizes ranging from smaller 2 bed units to 4 bed plus bedroom houses.

This range of house types will also affect the massing by providing a change in the eaves and ridge height creating subtle changes in scale. Landmark buildings, focal points and a clear hierarchy of routes and intersections are considered to increase the legibility of development.

	OPTION 1	OPTION 2
SITE AREA	2.25 hectares	1.65 hectares
AMOUNT	50 Dwellings	25 dwellings
SCALE	1.5/2 storeys	1.5/2 storeys
MIX	2, 3 and 4 bedroom homes	2, 3 and 4 bedroom homes
AFFORDABLE HOMES	Policy compliant	Policy compliant
<b>PUBLIC BENEFITS</b>		
<ul style="list-style-type: none"> <li>• Boost supply of housing - in an area where a five year supply of housing land is not currently in place;</li> <li>• Ecological enhancement - through retention of existing planting and new planting features;</li> <li>• New public open space - including new areas of play;</li> <li>• Improve access to Alma Wood;</li> <li>• Creating a high quality built environment;</li> <li>• Improvements to the existing drainage of the area;</li> <li>• Contributions to services and infrastructure via S106</li> </ul>		





# Design

The style of the new dwellings will respect and reflect the local architecture surrounding Grantham, which forms a strong link to Lincolnshire's rich rural history. The eventual design strategy will incorporate best practice design principles to ensure that dwellings are built to a high quality and standard. The layout ensures that privacy standards and the streetscape are not compromised through the topography of the site.

## Design

Houses are arranged to create an attractive setting of roof forms and vistas towards the site and within the site itself.

House layout and orientation will respond to its position within the site, the immediate topography and its position relative to footpaths, open areas and other carefully interlaced green spaces.

Pitched roofs with primary gable elevations will create interest and formality to the dwellings, especially when viewed as part of the streetscape. Careful and sensitive design of primary facades and a family of details for windows, entrances and recessed porches, will ensure the design forms its own identity without reverting to pastiche or imitation.

The architectural design as illustrated within the document is largely indicative, for the purpose of layout only. Further design development would need to take place to develop the architectural detail.

## Working with the Levels

Working closely with the existing levels, the dwellings have been positioned to coordinate with the contours by creating plateaus of development. This will allow for dwellings adjacent to the highway to remain predominately at the same level.

The spaces between the dwellings front to back are used to take up the difference in levels across the site. At the most extreme locations, split level dwellings and large landscaping zones will help to overcome these challenges.

## Relationships of Houses to Roads

In order to enclose space effectively, buildings will be sited close to the back edge of the public footway and this will require car parking to be sited between houses or within garages. This has the advantage of reducing the visual impact of on-site parked cars and to increase the amount of site area available for private rear gardens.

## Rear Privacy

Residents have high expectation of privacy from the private or garden side of the dwelling. In a medium density layout it should be possible to avoid any overlooking. Every effort has been made to avoid overlooking of rear facing living room windows. This has been achieved by considered design, building orientation, working with the existing site levels and innovative landscape led proposals.

## Garden Sizes

A minimum private rear garden of 75m<sup>2</sup> has been provided for all types of houses. This provision has been found to be an acceptable and workable minimum size that accommodates most household activities.

## Accessibility

All new dwellings should be able to be visited unassisted by disabled people as far as the entry to the dwelling. The 'Lifetime Homes' concept, will be adopted for an agreed percentage of the dwellings.

## Space Standards

Dwellings will be designed in accordance with the principals set out within the Technical Housing Standards- Nationally Described Space Standards to ensure the dwellings are of an appropriate size to create a viable and marketable development.

An element of affordable housing will be provided within the development in small clusters and could include social rented, shared ownership and low cost/reduced cost market housing.

## Daylight and Sunlight

Good natural light makes dwellings more attractive, pleasant and energy-efficient. The Housing layout will be designed to maximise daylight and sunlight to dwellings as far as possible, but not to the exclusion of other considerations, such as privacy or the achievement of an attractive streetscape.

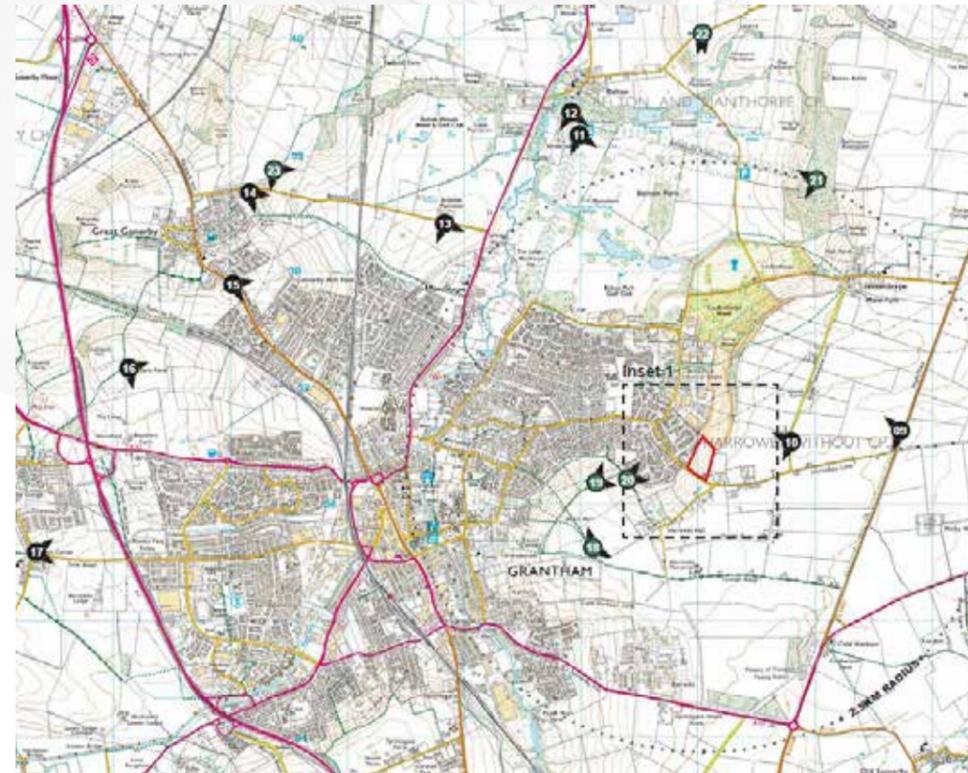
Dwellings have been positioned a minimum of 21m apart, where dwellings are on an elevated platform these distances will increase to compensate. As a rule adjoining properties will not obstruct views above 20o from a horizontal position.





# Heritage & Landscape Impact

The revised scheme has been amended to take account of the comments made in the recent planning appeal, concentrating development on the lower levels of the site where it was considered it doesn't contribute to important landscape character (Inspectors Report, para 14). The revised scheme has been prepared to contain the visual envelope as demonstrated in these long range views, where development has been positioned to work with the contours so as to sit neatly behind the rooftops of existing built form and not



### Views to and from Heritage Assets

The following images identifies the long range views to the site, the most significant of these is the designed landscape and setting of Belton House, some 3km north/ northwest of the site.

The scheme has been revised so that there is no development punctuating the horizon when viewed from the roof of Belton House. Additionally, the Belton House Setting Study (2010) jointly commissioned by the National Trust and South Kesteven Council, shows that the proposed site is not within the zone of theoretical visibility as viewed from the roof of the house.

The site cannot be seen at all from Bellmount Tower and the reduction in built form means the site will not be experienced in views together with the Tower.

### Other Long Range Views

The other long range views are shown, many of which are glimpsed views from roads or public footpaths, with intervening vegetation. The revised scheme would retain the visual envelope with the development sitting neatly behind the rooftops of the existing built form and retaining the 'clearly defined rural hinterland' the Inspector refers to.

The site is not visible at all from the steps of Belton House



11 View Looking South from Belton House @ Ground Level (Front Steps)

FIGURE 23: Viewpoint 11

The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



12 View Looking South from Belton House at Roof Level

FIGURE 24: Viewpoint 12 - Existing Condition

There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



21 View Looking South West from Bellmount Tower

FIGURE 42: Viewpoint 21

The site is not visible at all from the steps of Belton House



The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



	Planning Application and Appeal (100 units)	Option 1 (50 units)	Option 2 (25 units)
Green Rim	The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment	A further reduction in the number of dwellings and resultant stepping away from the highest point of the site would reduce the degree of visual intrusion.	Reducing the scale of development to 20 units means the majority of the site is located on the lowest level of the site with a significant proportion of the site undeveloped and/ or provision of open space.
Belton House and RPG Grade I Listed	The introduction of built development into a landscape seen in views from Belton House roof as almost pristine and undeveloped, would be of moderate harm the significance that Belton House and the RPG derive from this setting (para 30 Appeal Decision).	The reduced scheme of up to 50 units would mean that this development option would not be seen in views from Belton House roof.	The reduced scheme of up to 20 units would mean that this development option would not be seen in views from Belton House roof.
Bellmount Tower Grade II* Listed	There is no inter-visibility between the Tower and the site itself by virtue of the woodland and intervening curves in the escarpment. The development would however represent a small-scale change in the character of the wider context in which the Tower is experienced in some views (para 32 Appeal Decision).	The reduced scale of development, located in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptible change in which the Tower is experienced.	The reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptible change in which the Tower is experienced.
Harrowby Hall and Arch Grade II* Listed	These listed buildings are somewhat concealed by the fact that they are within a dip at the edge of the wider plateau and so “would not diminish the sense of rural approach and setting of these heritage assets to any great degree” (para 34 Appeal Decision).	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.
St Wulfram’s Church Grade I Listed	The development breaches the existing extent of built form on the eastern side of the town and includes development on the open green space above the settlement, impacting upon the rural setting of St Wulfram’s. However this to some degree was mitigated by the reduction in the scale of the proposal (para 36 Appeal Decision).	The reduced scale of development, located further in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptible change in which St Wulfram’s is experienced.	The reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptible change in which St Wulfram’s is experienced.



PROPOSALS AT HARROWBY

# Landscape Benefits and Connectivity

As a development Harrowby Lane aims to create a safe and inclusive extension to the existing residential area. There are huge opportunities to improve the urban edge in this location to make better use of land and create improved overlooking to address some of the concerns regarding antisocial behaviour that have been reported through previous consultations.

Key to establishing a 'heart' or centre to the scheme is creating a space with a high enough frequency of use that it becomes a place to go & enjoy the passive/active company of people.

This has been achieved through various spatial planning strategies. Firstly, the 'heart' is linear; running through the centre of the site from north to south. This aims to make a space that is easily accessible to every resident within the scheme.

Secondly, the linear space responds to present & anticipated future walking routes (potential popular future activity amongst residents due to the site's location, views, & proximity to Alma Woods). This aims to attract future & existing residents into the space - for their everyday and recreational journeys - thus achieving high usage & safer environment.

Thirdly, shared space streets & narrowed portions of the loop road create numerous possibilities for residents to move from the loop road, on the periphery of the site, into and across the shared recreational space in the centre. From the outset, this achieves safer pedestrian movement due to the design's prioritising of people.

Finally, the design of the space itself achieves a sense of openness due to its proportions, and yet critically has a density of use that makes the 'heart' of the scheme lively and animated.

***There is also the opportunity to provide a more direct route to Alma Woods that is green, attractive links into the wider 'Reconnecting Grantham to its Heritage' project that the Woodland Trust and National Trust are promoting through Heritage Lottery funding.***

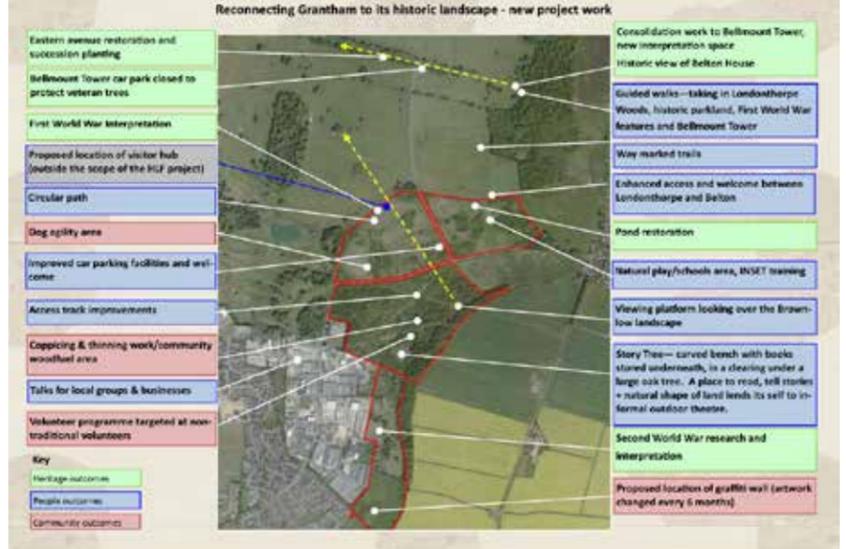
Initial conversations have been held with Ian Froggatt at the Woodland Trust regarding the creation of sustainable footpaths to the woods, along with tree planting should an application be approved.



The National Trust and the Woodland Trust, supported by National Lottery Players through the National Lottery Heritage Fund are working together to reconnect Grantham to its historic landscape. A key part of this is through interventions in Alma Park

Opportunity for improved connections, actively overlooked to reduce anti-social behaviour

Opportunity for funding to use 'left over' open space owned by SKDC





PROPOSALS AT HARROWBY

# Transport, Access and Parking

Curtins Consulting has played a key role in the evolution of the masterplan proposals to ensure that the transport, access and parking solutions to the site are deliverable. The site is highly sustainable offering a wide range of sustainable transport choices expected trip generation of the development is expected to be negligible on the local highway network.

## Access and Highways Layout

Site access will be located on Harrowby Lane and to consist of a simple priority junction with 2.4m x 43m visibility splay as set out in Manual for Streets. To accommodate the access junction and to reflect the definable change in characteristic of Harrowby Lane, the 30mph speed limit is to be extended past the site. This will also aid road safety.

The highway layout within the site has been developed to make vulnerable road users the priority through the use of shared surface areas, speed plateaus at all junctions and the use of off road paths throughout the site and linking to adjoining areas;

The site is permeable for pedestrians and cyclists allowing movement towards the Fifth Avenue area and towards the open country through rather than around the site.

## Parking Strategy

Many of the new dwellings will be served with on plot parking generally located to the side, front or rear of the dwelling. Parking spaces and garages will be sited so that there is sufficient room for users to enter and exit the vehicle. The distance from the car parking space to the home will be kept to a minimum and will be level or gently sloping. Disabled parking and cycling parking numbers will be provided in accordance with the appropriate standards.

## Traffic Generation

Traffic generation from the expected level of development would be x 2 way vehicle trips in the morning peak and x 2 way vehicle trips in the evening peak. This level of traffic generation would have no significant effect on local highway capacity.

## Servicing and Refuse Collection

The masterplan layout and highways design has been reviewed at a strategic level to ensure that servicing and refuse collection to the properties can be adequately achieved.



The site is permeable for pedestrians and cyclists and the design developed to make vulnerable road users a priority.

Car and cycle parking will predominantly be on plot. In some areas courtyard car parking is proposed in line with best practice design principles.

New priority junction off Harrowby Lane will serve the development in line with the design requirements set out within the Manual for Streets.





# Biodiversity

The development will be able to deliver significant ecological benefit to the wider area, providing additional habitat and foraging potential for local wildlife, as well as linkages between fragmented wildlife communities.

It is anticipated that the improvements to landscape infrastructure will make a significant contribution to local wildlife habitats through the following ways:

- greatly increase the acreage devoted to planting;
- diversify the existing monotone nature of unimproved grassland;
- introduce new habitat typologies, with the introduction of wildflower meadow, standing water and associated marginal planting;
- improve now degraded elements such as over-mature and damaged boundary tree and hedge planting;
- Use a planting matrix with species indigenous to the local area, improving biodiversity;
- Create wildlife corridors between fragmented habitats, linking for example Alma Wood with the roadside verge and established hedgerow of the unclassified road south-east of the site.



Improve site-wide biodiversity, creating wildlife corridors and connecting fragmented wildlife communities

Broaden the diversity of wildlife habitats with the introduction of standing water, marginal planting and wildflower meadow

Use a palette of local native meadow, herb, shrub and tree species to improve biodiversity and reinforce local landscape character





# Drainage

PROPOSALS AT HARROWBY

The development will be able to deliver a sustainable urban drainage system, providing a suitable onsite drainage scheme as well as providing betterment to the pre-existing

## Drainage

A revised drainage strategy was prepared by Curtins in response to the LLFA comments and whilst the final drainage solution will be determined at a later stage, Lincolnshire County Council's Environment and Economy Directorate (LCC) have agreed to the principle of the drainage scheme as proposed.

The revised masterplan layout has been developed to ensure that the amount of storage can still be accommodated on site.

## Surface Water Design

Under the concept design, the surface water runoff and roofline drainage from the proposed development could discharge as follows:

- Provision of permeable driveways and swales as part of a sustainable drainage system (SuDS).
- Discharge rates can be restricted to Greenfield runoff rates of 5l/s/ha;
- Flow rates to be provided by installed flow restriction devices including SuDS basins and a cut off land drain across the eastern proportion of the site.

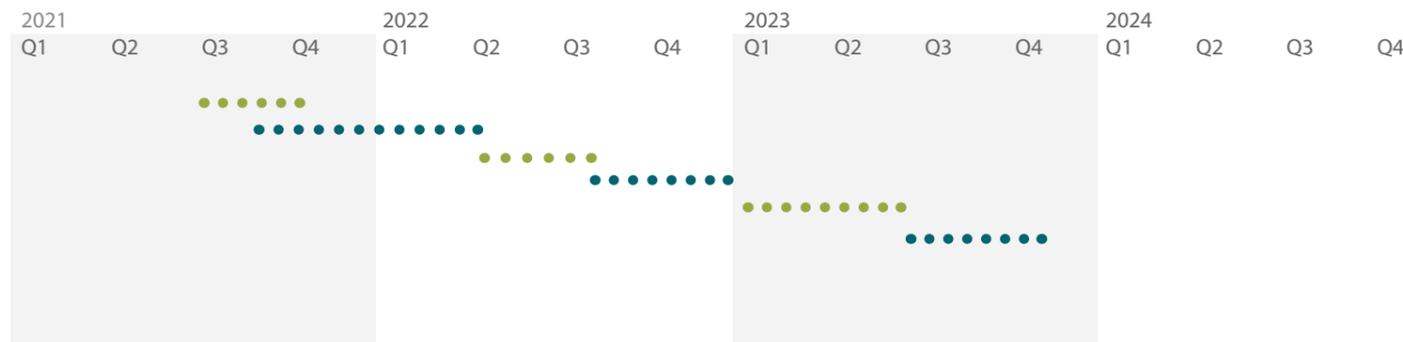
## Foul Water Drainage

There is no existing foul water drainage on site. The development is proposed to connect to public sewers in the vicinity of the site at Harrowby Lane.



# Next Steps

## A short-term deliverable site



- Local Plan Preferred Options
- Outline Planning Application
- Appoint Builder / Contractor
- Reserved Matters Application
- Start Infrastructure Works
- Finalise Development

### CONCLUSIONS

This vision document sets out how development can be delivered on the site which, following evaluation clearly represents an excellent candidate for allocation within the current planning context for the following reasons:

- » The site is available for development and can make a contribution of the district's short term land supply.
- » The site provides an extension of existing development, providing the opportunity to better integrate the existing housing to the countryside.
- » The site promotes quality housing that will meet the needs of the area and local residents.
- » Whilst there are challenges, these can be overcome through careful design and mitigation to provide a development that is a true asset to Grantham.

In short, the site has potential to deliver a well integrated, sustainable, mixed and positive residential addition to Grantham. We look therefore look forward to working with SKDC further to deliver development on the site.

### DELIVERY

In terms of delivery, an indicative programme for the development of the site is provided below. This shows that the intention is to submit and progress the necessary planning permissions in tandem with the Local Plan preparation process. The landowner has current relationships with regional and national contractors who will be appointed once the principle of development is established through an outline planning application.

The roads and infrastructure would be installed followed by a phased development. The landowner is committed to the short-term delivery of the site with the intention that the site could make an early contribution to the housing numbers required by the District.

### INVOLVEMENT

The proposal from the outset has been subject to meaningful engagement with the Council and prepared in the context of good practice guidance contained with the 2011 Localism Act, 2012 National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).

It is recognised that overall community input is key and that future matters of the approach to consultation will look to be agreed with SKDC. The design of the proposals will be discussed with key stakeholders including the Council, Grantham Civic Society, Londonthorpe and Harrowby Without Parish Council and local residents and we look forward to working with them over the coming years.

### EVIDENCE BASE

Overall, it is well established that development plans need to be; positively prepared, justified, effective and consistent with national policy. Further, in order to include sites within SKDC land supply the sites need to be deliverable and developable (paragraph 47, footnote 11).

Following on from the call for sites submission, this vision document can be seen as the first step towards demonstrating and supporting the council in meeting the above criteria. It has sought to understand the traffic and access impact, ground conditions, landscape and heritage sensitivities and drainage implications alongside and to inform the detailed masterplan. Work to date therefore that the site is deliverable and developable following a masterplanning exercise to determine site capacity. The intention to build on this document effectively building the site's evidence base, guided future discussions with future iterations produced as required.



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# Harrowby Lane Grantham Vision Document

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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	Anne	
Last Name	Dew	
Organisation	Persimmon Homes East Midlands	
Address	[REDACTED]	
Postcode	[REDACTED]	
Telephone	[REDACTED]	
Email Address	[REDACTED]	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	23/11/2020

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	*	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	*	No		Unsure	
If not please provide details.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	*	No		Unsure	
If not please provide details.					

7. Proposal 3 – Policies not proposed to be changed significantly					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	*	No		Unsure	
If not please provide details.					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	*	No		Unsure	
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes	*	No		Unsure	
If not, please provide details of what changes you think should be made.					

<b>Q5b – Settlement Hierarchy Methodology</b>					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes	*	No		Unsure	
If not, please provide details of what changes you think should be made.					

<b>Q5c – New Settlement</b>					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes		No	*	Unsure	
If so, please outline any suitable and deliverable proposals.					

<b>10. Proposal 6 – Housing Need and Requirement</b>					
<b>Q6 – Housing Need and Requirement</b>					
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?					
Yes	*	No		Unsure	
If not, what evidence do you have to justify an alternative need and requirement?					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
Do you agree that Grantham should remain as the focus for growth in South Kesteven?					
Yes	*	No		Unsure	
If not, please provide details and any alternative proposals.					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?					
Yes	*	No		Unsure	
If not, please provide details and any alternative proposals.					
<b>Q7c – Larger Villages</b>					
Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?					
Yes	*	No		Unsure	
If not, please provide details and any alternative proposals.					

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	*	No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	*	No		Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	*	Unsure	
-----	--	----	---	--------	--

If yes, please provide details.

**Gypsy and Traveller accommodation needs to be identified in consultation with the Gypsy and Traveller community. Gypsy and Traveller accommodation is best provided through smaller Gypsy and Traveller sites. It is not appropriate for larger housing sites to accommodate Gypsy and Traveller pitches, these will not be deliverable and such housing developments are generally not where Gypsy and Travellers’ would choose to reside. A thorough review of potential smaller sites needs to be undertaken by the Council.**

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	*	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?					
Yes	*	No		Unsure	
If not, please provide details.					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
Yes	*	No		Unsure	
If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.					
<p>Proposal 10 in the Issues and Options Paper specifically mentions that this consultation will consider whether higher standards should be sought from developments, however it is recognised within Proposal 10 that higher standards will have viability implications.</p> <p>Building Regulations are taking the lead on this issue and requiring houses to be more energy efficient. The Government’s recent consultation ‘The Future Homes Standard: Changes to Part L and Part F of the Building Regulations for New Dwellings’ proposes a significant increase in the energy requirements for new homes in 2020 and the Future Home Standard being introduced by 2025. It is not necessary to introduce a new policy setting out higher standards as such a policy would soon become outdated and surplus to requirements.</p>					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?					
Yes		No	*	Unsure	

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No	*	Unsure	
-----	--	----	---	--------	--

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	*
-----	--	----	--	--------	---

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	*	No		Unsure	
-----	---	----	--	--------	--

Please give details

Parking standards should be set out, however some flexibility should be incorporated into this policy which allows lower standards of provision in sustainable locations. Persimmon Homes would suggest the following car parking standards:-

- 1 Bed Dwelling = 1 space
- 2 Bed Dwelling = 2 spaces
- 3+ Bed Dwelling = 3 spaces

Any parking policy should also recognise that garages can count as car parking spaces and allow for different approaches to car parking, for example, frontage parking and tandem parking.

#### 18. Any other Comments

##### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Persimmon Homes has an option on part of Housing Allocation LV-H3 Low Road Barrowby and we are actively working with the Council and other interested parties to produce a comprehensive masterplan for the allocation. We also have a current outline planning submission in for part of this allocation for up to 83 dwellings (planning reference S/19/1131) which again we are actively progressing. In terms of delivery, we aim to be on site in late 2021.

#### Part C: Sustainability Appraisal Scoping Report

#### 19. Comments about the Sustainability Appraisal Scoping Report



**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0070

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

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**How to respond:**

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**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Luke	
Last Name	Bamforth	
Organisation	Greater Lincolnshire Nature Partnership	
Address	[REDACTED]	
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	23.11.20

## Part B: Issue and Options Consultation Questions

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	
If not please provide details.					
Not answered					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	x	Unsure	
If not please provide details.					
The GLNP is a partnership of 49 organisations working together to achieve more for nature. Each of these organisations may respond individually and as such we cannot give a definitive or comprehensive response.					
The NPPF requires Local Plans to “take a proactive approach to mitigating and adapting to climate change,” ( <b>paragraph 149</b> ). With this in mind and the Council’s declaration of a climate emergency there should be greater emphasis of this in the Vision. This could be achieved with the inclusion of a sixth bullet point in paragraph four of the vision. Suggested wording might be as follows, “Mitigating against climate change, working to achieve net zero carbon emissions by 2050 and adapting to any of its existing or future effects.”					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No	x	Unsure	
If not please provide details.					
The GLNP is a partnership of 49 organisations working together to achieve more for nature. Each of these organisations may respond individually and as such we cannot give a definitive or comprehensive response.					
In light of the Council’s declaration of a climate emergency and commitment to net zero carbon emissions by 2050 there should be mention of development in the context of a reduced carbon footprint in the objectives. This would further contribute to requirements of the NPPF for Local Plans to “take a proactive approach to mitigating and adapting to climate change,” ( <b>paragraph 149</b> )					

7. Proposal 3 – Policies not proposed to be changed significantly					
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### Q3 – Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No	x	Unsure	
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If not please provide details.

The GLNP is a partnership of 49 organisations working together to achieve more for nature. Each of these organisations may respond individually and as such we cannot give a definitive or comprehensive response.

The GLNP feel that the following require revision in light of both the current NPPF (2018) and the Councils declaration of a climate emergency.

#### EN2: Protecting Biodiversity and Geodiversity

The protection, enhancement and management of the natural environment is a crucial part of climate change adaptation. As such, the GLNP feels that reference to this could be made within the supporting text for policy EN2. This would put the Plan's commitment to biodiversity and the environment in context in regards to its Climate Emergency commitments.

The GLNP supports the policy wording on protecting biodiversity and geodiversity, especially with regards to "seeking to enhance ecological networks and seeking to deliver a net gain on all proposals, where possible" in line with requirements of the current NPPF concerning ecological networks (**paragraphs 170d, 174a and 174b**) and biodiversity net gain (**paragraphs 170d and 174b**). However, Natural England currently estimates that the Environment Bill will become law by 2023, as such it will be important that the Local Plan review takes into account what this means in regards to future commitment to mandatory 10% Biodiversity Gain (**Part 6, Paragraph 90 and Schedule 14**), either within the policy or through supplementary planning documents.

The GLNP also feels that there needs to be a change in wording regarding the Lincolnshire BAP. The current Biodiversity Action Plan for Lincolnshire ends in 2020. It will be replaced by a Greater Lincolnshire Local Nature Recovery Strategy which is currently being developed. In light of this, policy referring to the BAP should mention future strategies. For example, "*species populations and habitats identified in the Lincolnshire Biodiversity Action Plan, or any future nature strategy...*"

#### EN3 Green Infrastructure

The GLNP is glad to see policy and supporting text concerning green infrastructure, however, the NPPF states that Local Plans "should set out the contributions expected from development" including "setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure)" (**Paragraph 34**). In light of this the Local Plan must be more specific about the level and types of green infrastructure which must be provided by development. This could be included within the Plan itself either in Policy EN3 or ID1, or through the addition an SPD. Meeting targets for appropriate green infrastructure would also be an opportunity for developments to meet biodiversity net gain requirements.

It is important that the planning system recognises that the protection, enhancement and management of the natural environment is a crucial part of climate change mitigation and adaptation. Therefore, the GLNP is glad to see that the Plan recognises this in the supporting text for policy EN3.

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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No		Unsure	
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If not please provide details

Not Answered

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No		Unsure	
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If not, please provide details of what changes you think should be made.

Not Answered

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
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If not, please provide details of what changes you think should be made.

Not Answered

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

Not Answered

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, what evidence do you have to justify an alternative need and requirement?</b>					
Not Answered					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
<b>Do you agree that Grantham should remain as the focus for growth in South Kesteven?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details and any alternative proposals.</b>					
Not Answered					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
<b>Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details and any alternative proposals.</b>					
Not Answered					
<b>Q7c – Larger Villages</b>					
<b>Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details and any alternative proposals.</b>					
Not Answered					
<b>Q7d – Other Settlements</b>					
<b>Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details and any alternative proposals.</b>					
Not Answered					
<b>Q7e – Consideration of the Market and Deliverability*</b>					
<b>Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>Please provide details</b>					
Not Answered					

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).

12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation					
<b>Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation</b>					
Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?					
Yes		No		Unsure	
If yes, please provide details.					
Not Answered					

13. Proposal 9 – Revisions to the Employment Policy					
<b>Q9a – Strategic Employment Allocations</b>					
Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?					
Yes		No		Unsure	
If not, please provide details.					
Not Answered					
<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?					
Yes		No		Unsure	
If not, please provide details.					
Not Answered					

14. Proposal 10 – Climate Change					
<b>Q10 – Climate Change Policies</b>					
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
Yes		No	x	Unsure	
If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.					
The GLNP is a partnership of 49 organisations working together to achieve more for nature. Each of these organisations may respond individually and as such we cannot give a definitive or comprehensive response.					

Climate change mitigation and adaptation should be a golden thread through the Local Plan, contributing to the Council’s declaration of a climate emergency and its subsequent commitment to reduce carbon emissions to net zero by 2050. This would also contribute to the NPPF’s requirement for Local Plans to “take a proactive approach to mitigating and adapting to climate change,” (paragraph 149).

It is important that the planning system recognises that the protection, enhancement and management of the natural environment is a crucial part of climate change mitigation and adaptation. The Plan should reflect this within any relevant environmental policy (including EN2 and EN3) as well as any climate change specific policy. The Plan should also be clear that enhancement of the natural environment will play a key role in achieving net zero carbon emissions.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
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#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

Not Answered

#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

Not Answered

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
Please give details					
Not Answered					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes		No		Unsure	
Please give details					
Not Answered					

<b>18. Any other Comments</b>					
<b>Q14 – Any other Comments</b>					
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?					
<p>The GLNP is a partnership of 49 organisations working together to achieve more for nature. Each of these organisations may respond individually and as such we cannot give a definitive or comprehensive response.</p> <p>The GLNP feels that the existing Local Plan achieved strong environmental policy in line with the previous NPPF (2012). In part this was through working proactively with the GLNP and other environmental organisations in the preparation of statements of common ground. This review is an opportunity to continue that close working and create a positive Local Plan which meets the needs of both people and the natural environment, while bringing it in line with the current NPPF (2018) and the Government’s commitments stated in their 25 Year Plan for the Environment.</p> <p>The GLNP feel that central to ensuring effective local planning and policy making is sourcing and maintaining credible data. This pays dividends when Local Plans and development management requires the information to support decision making. The NPPF states that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence” (<b>paragraph 31</b>).</p> <p>As such, the Council’s recognition that the evidence base with respect to the Employment Land Study needs updating (<b>paragraph 1.13</b>) opens a wider discussion on the viability of the Plan’s evidence base. The GLNP feel that up to date biodiversity opportunity mapping will help provide the evidence base required for the Plan to meet the environmental objectives of sustainable development as required through the NPPF (<b>paragraph 8c</b>). It will also enable a strategic approach in regards to protecting and enhancing ecological networks and providing net gains for biodiversity as required by the NPPF (<b>paragraphs 170d and 174b</b>). Considering Biodiversity Opportunity Mapping has been completed for Central Lincolnshire by the GLNP, mapping for South Kesteven will also contribute to meeting cross boundary working, as required by the NPPF and the duty to cooperate.</p>					

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

No comments

**Thank you for responding to this consultation.**

Our ref: JB61305  
M: [REDACTED]  
E: [REDACTED]  
Date: 23/11/2020

Roger Ranson  
Head of Planning Policy  
South Kesteven District Council  
Council Offices  
St. Peter's Hill  
Grantham  
NG31 6PZ

Submitted by email

Sent by email to: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Dear Roger,

**Representation to South Kesteven Local Plan Review (2041)  
Issues & Options Consultation and Call for Sites 2020  
Land at Bourne, Lincolnshire  
On Behalf of Mrs A Knight and Mrs V Sandall**

I write on behalf of Bidwells' clients, Mrs A Knight and Mrs V Sandall, in response to South Kesteven District Council's Issues and Options Consultation and Call for Sites 2020 which forms part of the Council's Local Plan Review (2041).

Our clients have land to the south of Mill Drove and west of Meadow Drove, Bourne.

This representation letter sets out our client's response to the questions in the Issues & Options Consultation including some of the questions as set out in the document. I have enclosed with this letter a completed Call for Sites form.

Overall, we support the Council's decision to commence a review of the adopted Local Plan in accordance with Policy M1 for the Adopted Core Strategy and national planning policy and guidance.

Question 1a – The Vision: We are supportive that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level subject to an appropriate assessment of growth to help inform the spatial strategy for the District. We note that Bourne will have further developed its market town role.

Question 2 – Objectives: We support Objective 6 which seeks to enhance the role and function of Bourne as a Market Town (alongside other market towns of The Deepings and Stamford). We note that Objective 10 seeks to ensure that new residential development includes a mix and range of housing types which are suitable for a variety of needs and we consider our client's land can aid in meeting this objective.

Question 3 – Policies not proposed to be changed significantly: We do not fully agree that Policy BRN1: Bourne Housing need of the adopted Local Plan does not need to change significantly. The policy proposes only one new housing site for Bourne. Our client's land forms the northern portion of what could be a wider development area to the east of the existing Bourne settlement boundary and west of Meadow Drove. We consider that our client's site, whether developed in isolation or together with

adjoining land would contribute to meeting the future housing need for the area bringing forward residential development in a sustainable development for Bourne.

Question 4 – Plan Period: We are supportive of the Council's decision to extend the plan period of the Local Plan from the adopted position of 2036 to the year 2041. The timetable for the review of the Local Plan anticipates examination from 2024 and the adoption of the Local Plan by January 2025.

Should the Local Plan be adopted by the Council by January 2025, then the strategic policies will look ahead over a minimum 15-year period from adoption which is in accordance with Paragraph 22 of the National Planning Policy Framework (NPPF, 2019). Should adoption of the Local Plan be delayed beyond this timeframe, we suggest that the Council consider extending the plan period beyond 2041.

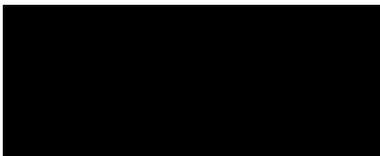
Question 5a – Settlement Hierarchy: We are in broad agreement that the settlement hierarchy should be retained in the new Local Plan.

Question 6 – Housing Need and Requirement: It is noted that the housing need and requirement in the new Local Plan be reflective of an appropriate robust assessment of the Local Housing Need figure for South Kesteven at the time of adoption of the Local Plan.

Question 7b – Stamford, Bourne and The Deepings: We agree that Bourne should remain as a focus for growth and our client's land has the potential to be an asset in the ensuring the level of growth can be met. The current Local Plan does not provide many allocations surrounding Bourne, the review of the Local Plan could provide the opportunity to support appropriate growth of Bourne through our client's site in the wider area.

Should you have any questions in respect to this representation, please do not hesitate to contact me. I look forward to receiving your written confirmation of receipt of this representation and I look forward to receiving notification of all future stages of the Council's Local Plan Review (2041).

Kind regards,



**India Chard**  
Assistant Planner, Planning

**Enclosures. Completed Call for Sites Form**

For Official Use Only:

REF: SK.IAO.0072

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
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Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	Mr
First Name	Douglas and Andrew	David
Last Name	Freeman	Hutchinson
Organisation		Boyer
Address	██████████	██████████████████ ██████████ ██████████ ██████████████
Postcode		██████████
Telephone		
Email Address	██████████	████████████████████████████████████████

**Please note:** that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
Please see representation for more details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
Please see representation for more details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

If not, please provide details of what changes you think should be made.

Please see representation for more details.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
-----	--	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No	<input checked="" type="checkbox"/>	Unsure	
-----	--	----	-------------------------------------	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

Please see representation for more details.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

If not, please provide details and any alternative proposals.

Please see representation for more details.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

If not, please provide details and any alternative proposals.

Please see representation for more details.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

If not, please provide details and any alternative proposals.

Please see representation for more details.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

Please provide details

Please see representation for more details.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?					
Yes		No		Unsure	
If not, please provide details.					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
Yes		No		Unsure	
If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?					
Yes		No		Unsure	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes		No		Unsure	
Please give details.					

--

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

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**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

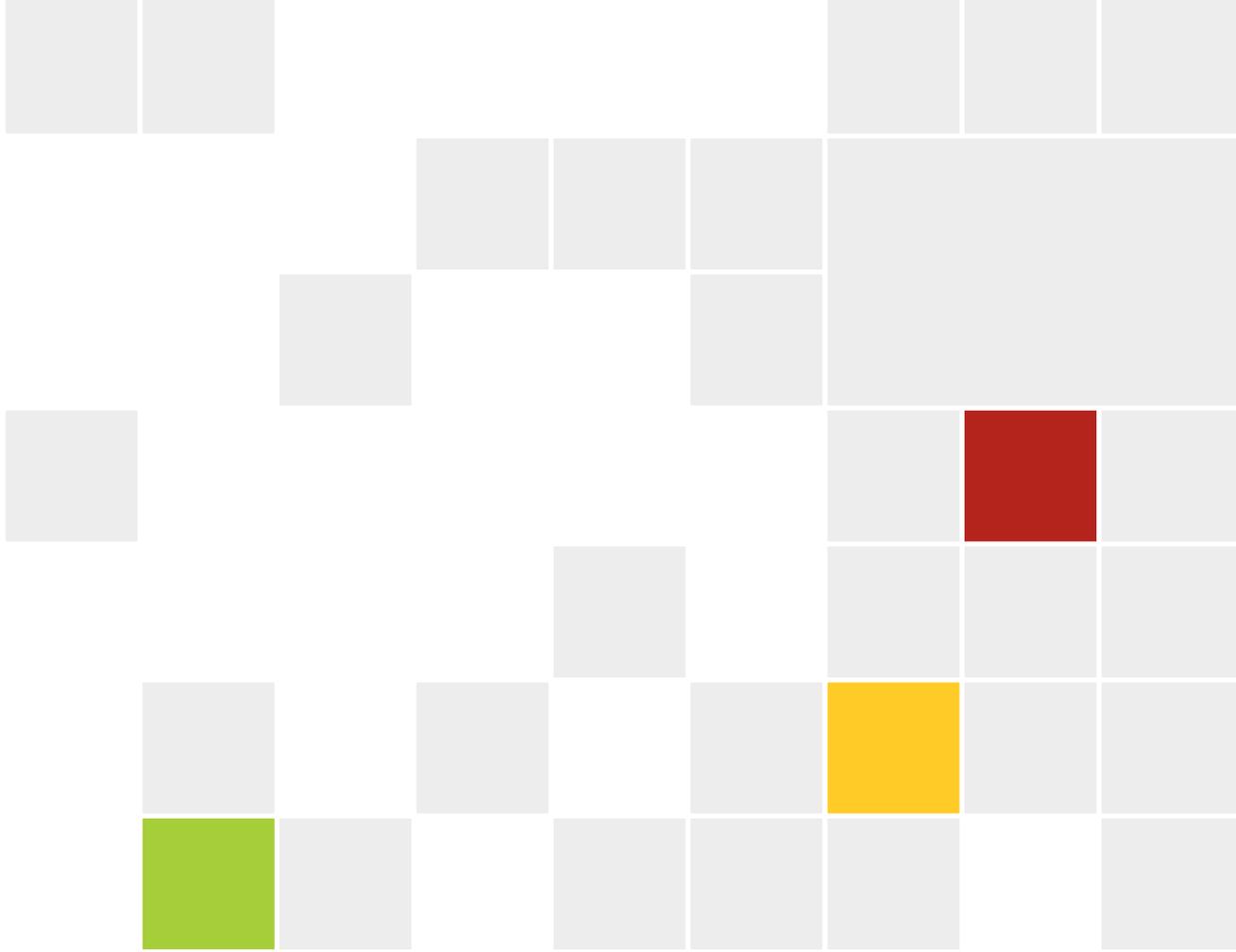
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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

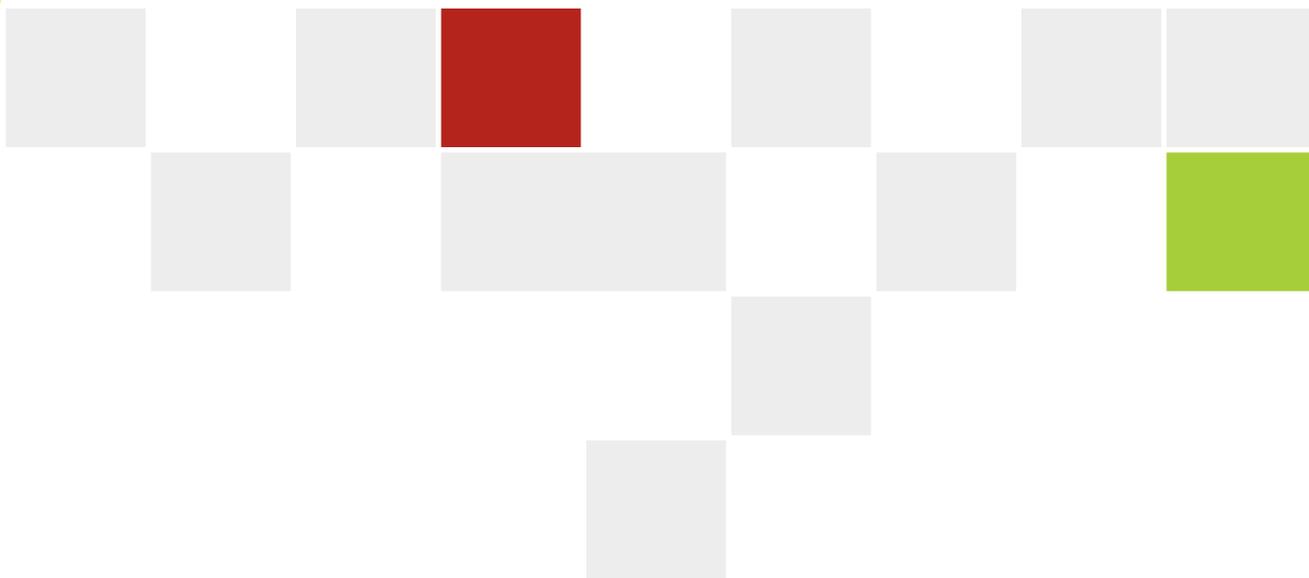
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**Thank you for responding to this consultation.**



# Land west of A15, Baston

South Kesteven Local Plan Representations



**Boyer**

## Report Control

Project:	South Kesteven Local Plan Representations
Client:	Douglas & Andrew Freeman
Reference:	20.3029
File Origin:	<a href="http://lucas/sites/boyerprojects2020/midlands/20.3029/4">http://lucas/sites/boyerprojects2020/midlands/20.3029/4</a> Boyer Planning/4.02 Reports/201109 - Draft Representations -Baston.docx
Primary Author	DH
Checked By:	LM / RB

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	09/11/2020	Draft	LM
2	23/11/2020	Final	RB

## **TABLE OF CONTENTS**

1. Introduction	3
2. Section 2: The Vision and Objectives	5
3. Possible Policies to be Changed or Introduced	6

## **APPENDIX**

Appendix One - Site Location Plan

Appendix Two - Vision Document

## 1. INTRODUCTION

- 1.1 This Representation has been prepared by Boyer on behalf of Douglas & Andrew Freeman in respect of the South Kesteven Local Plan Review – Issues and Options Consultation 2020. Mr D & A Freeman jointly own 15.5 hectares of land immediately adjacent to the western edge of Baston, west of the A15 and south of Maltby Drive.
- 1.2 These representations relate to a proposal for a new village extension in Baston comprising approximately 100 new dwellings with the option of a further extension of up to 150 new dwellings in subsequent local plan reviews. We have therefore prepared two call for sites submissions in relation to Land fronting Deeping Road (A15) and Land fronting Greatford Road, Baston, so they can be assessed separately.
- 1.3 The South Kesteven Local Plan will set out the spatial strategy for the administrative area of South Kesteven up to 2041. The Sustainability Appraisal produced by AECOM sits behind the Issues and Options consultation document as the main evidence based document to inform the strategy.
- 1.4 This representation is coupled with two Call for Sites Submissions that promote the above two sites in Baston for allocation in the new Local Plan (2041). The submission is supported by a Vision Document prepared by Boyer Design which includes a framework plan (please refer to Appendix 1) and a highways scoping note prepared by Bancroft Consulting which demonstrate how the two sites could be delivered within the wider context.
- 1.5 The proceeding sections of this Statement addresses in turn each of the relevant questions in the Consultation Response Form and assesses if the South Kesteven Local Plan Review – Issues and Options Consultation has been prepared in accordance with legal and procedural requirements.
- 1.6 As set out in paragraph 35 of the Revised Framework (2019), Local Plans are considered 'sound' if they are;
  - a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
  - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.'*

## 2. SECTION 2: THE VISION AND OBJECTIVES

### Question 1a – The Vision

*So you agree that the Vision should be broadly the same for the new plan but the updated with respect to the plan period and housing growth level?*

- 2.1 It is broadly agreed that the vision should be the same for the new plan with updates to reflect the plan period and growth level. The Review should have particular regard for existing under provision of housing combined with the significantly higher housing requirement. South Kesteven have committed to a number of large strategic allocations which is the correct approach but there needs to be a greater emphasis on the provision of smaller, more deliverable sites to complement these larger schemes.

### Question 2 – Objectives

*Do you agree that the Objectives should remain the same for the new plan? If not please provide details.*

- 2.2 Having regard to the concern raised above it is considered prudent to add an additional objection under the section *Social: Housing, Health, Social and Community Needs* as follows: *“To ensure new housing development is viable and deliverable and provides sufficient affordable homes to meet local needs”*. These are important principles and objectives enshrined in Government planning policy and guidance that should be given expression in the new South Kesteven Local Plan.

### 3. POSSIBLE POLICIES TO BE CHANGED OR INTRODUCED

#### Question 5a

*Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.*

- 3.1 The principles of the Settlement Hierarchy are generally sound however this should be subject to updating the scoring so it reflects the latest provision of services and facilities and taking account of how it can accommodate a much higher housing requirement.
- 3.2 The Council needs to take account for existing allocations and commitments in determining the settlement's capacity to continue to accommodate the same level of growth this plan period as they have done in the last period.

#### Question 6

*Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?*

- 3.3 The Council's current plan sets out a need of 650dpa which is the result of an uplift from the original target of 625 new homes a year because of a poor build-out rate between 2011 and 2018. This is rather than adopting the Government's standard methodology which would have required 767dpa and the Council states it can therefore spread the shortfall (thus far) over the entire plan (to 2036) as opposed to a 5 year period.
- 3.4 However, when looking at the justification for the new 754dpa target the Council is proposing, this is based upon the 2014 household projections and the latest affordability ratio (currently 2018) in accordance with national policy. As the Council proposes that 2018 be used as a baseline for the plan period as it aligns to the evidence being used, is recent and therefore relevant to this plan review. This will need to be reviewed when newer household projections and affordability ratios are published.
- 3.5 When looking forward to these future adjustments to the Standard Method, it is assumed these would result in further increases from the current level and therefore the Council should seek to increase the figure of 754dpa to a higher number, to take account of likely future increases in the LHN.
- 3.6 This is because the affordability ratio in the area has increased from 6.89 in 2011 to 8.16 in 2019, which represents a 16% increase over 8 years, according to the most recent data on the median house prices ratios in South Kesteven. If this rate of increase were continue over the new proposed Local Plan period from 2018 to 2041, this could mean that the affordability ratio could reach 11.91 by 2041, if appropriate action is not taken to arrest this rate of increase.

- 3.7 If this trend were to continue, then further increases would need to be planned for to make sure that the figure finally adopted as the new Local Plan target does not become out of date during its production process. The Council should not wait for future adjustments to the SM to be made part way through the LP production process as this may cause delays to an already long process. They should seek to 'bake in' an element of expected future uplifts to the LHN requirement to ensure that the LP process can proceed smoothly.
- 3.8 This concern about the length of time it takes to prepare and adopt a Local Plan is well founded, as despite the Government's recent announcement to change the planning system so that Local Plans only take 30 months (2.5 years) to prepare, the current (recently adopted in 2020) plan for 2011-2036 took over five years to prepare.
- 3.9 In addition to the above, there is also concern about the past rates of delivery in the District. As the Council admits in its own Local Plan, the rates of delivery in the area between 2011 and 2018 are poor. Subsequently, the Council (according to the latest results) has been failing the Housing Delivery Test by only delivering 82% of the houses required (1,602 compared to 1,947). On that basis the Council would need to add a 20% buffer to its housing needs when determining if it has a 5 year supply of housing land. This approach should be taken to its currently devised LHN figure of 754dpa, which would increase it to 905dpa.
- 3.10 Although it may be argued that the LHN figure takes account of past delivery and thus it 'wipes the slate clean' in terms of previous under-delivery, South Kesteven has for a long time not been meeting its needs, according to its own monitoring data. The latest 5 Year Housing Land Supply Position (2019) shows that on average between the 2011/12 and 2018/19 monitoring years, an average of 531dpa were completed. This is against a target of 650dpa, showing that over the long term they have only been meeting 82% of their (current and lower) target. This suggest a longer term problem of delivery in the area, and thus they should proactively plan for a higher level of housing to enable rates of delivery to be boosted.
- 3.11 Looking specifically at affordable housing, the latest SHMA for the area (2017) sets out a requirement for 238dpa of affordable units. This was a decrease of 41dpa from the previous assessment undertaken in 2015, and yet for some reason the Council's recently adopted plan refers to the 2014 SHMA which set a target of 343dpa. Regardless, the Local Plan sets a target of 30% of on-site units to be provided as affordable, a decrease from the 2010 Core Strategy of 35%. This reduction in target seems odd considering the worsening affordability situation in the District, as well as the Council's reference to an outdated SHMA in its current plan (which highlights a higher need figure than their latest data).

- 3.12 We attempted to find information specifically relating to the delivery of affordable housing, however, there was very little information, within the Council's most up to date AMR being from 2014. This showed that between 2011/12 and 2013/14 the number of affordable homes delivered was 264 (117, 56 and 91 in each year respectively) compared to a Core Strategy target of 236dpa. The delivery of affordable housing is similar to that of market housing, in that it has been disappointing. The lack of recent data, and the information we do have points to a need to uplift housing targets to enable further affordable units to be brought forward. On that basis a significant uplift to enable additional affordable housing should be applied to the housing target in the new Local Plan.
- 3.13 Overall, the Council should seek to go beyond the LHN set out by national policy and be ambitious about making up for lost time due to its previous poor rates of delivery. On the basis of their past performance and their current status under the Housing Delivery Test, we would suggest an additional 20% uplift to the current target to help ensure there is sufficient growth planned for in future.

#### **Question 7a – Focus of Housing Growth on Grantham**

*Do you agree that Grantham should remain the focus for Growth in South Kestven? If not, please provide details and any alternatives*

- 3.14 Grantham should remain the focus of development for South Kesteven. It is the Sub Regional Centre with the widest range of services in the most accessible and strategic location for growth. There is also significant unconstrained land around its periphery capable of accommodating strategic scale growth in the form of SUEs or a new settlement.
- 3.15 Growth in Grantham is best delivered at a strategic scale so the significant housing requirement can be delivered sustainably through the provision of large sites with comprehensive on site infrastructure. The delivery of strategic sites would ensure Grantham can continue to grow exponentially to meet the housing needs of the District.
- 3.16 One of the consequences of allocating strategic scale sites is they take time to come forward. Therefore, it is necessary to identify a suitable quantum of smaller yet still significant allocations elsewhere in the District to meet the housing need early in the plan period. Considering the quantum of housing required it will be necessary to identify significant amount of new allocations in the towns and large villages.
- 3.17 It is therefore considered that the remaining growth outside of Grantham should be spread more evenly between the towns and large villages to maximise the delivery of deliverable 50 – 250 unit allocations.

### **Question 7b – Stamford, Bourne and The Deepings**

*Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth? If not, please provide details and any alternative proposals.*

- 3.18 Stamford has a significant amount of growth to be accommodated to the north of the town Policy H1: Housing Allocations (STM1-H1). This allocation, for approximately 1300 units has yet to come forward and is going to take the majority of the plan period before the entire site is delivered. Further allocations in the same part of Stamford could saturate the local housing market slowing the delivery of the existing allocation. Further allocations in Stamford would therefore have to be directed to the south or east of the town which is significantly more constrained.
- 3.19 The administrative boundary of South Kesteven also wraps tightly around the town therefore limiting the amount of further growth it could potentially accommodate. It is therefore not possible to continue distributing the same level of housing to Stamford.
- 3.20 Bourne and the Deepings have the potential to deliver further growth but it would be unrealistic to expect these settlements to deliver higher than the 8-10% percentage growth than they are already accommodating.

### **Question 7c – Large Villages**

*Do you agree that it is still appropriate to plan for a level of housing growth across the Larger villages within South Kesteven where there is a range of available services and facilities? If not, please provide details and any alternative proposals.*

- 3.21 Considering the apparent constraint to Stamford and the number of Large Village's identified in the Settlement Hierarchy, it would be sensible to increase the percentage distribution of housing to Large Villages. This would also help to balance the housing trajectory as more modest village extensions are more deliverable in the short term and would offset the slower delivery of strategic allocations in Grantham, Stamford, Bourne and the Deepings early in the plan period.
- 3.22 It is sensible to continue to identify large villages as a tier in the Settlement Hierarchy without necessarily identifying the level of growth each village should accommodate from the outset. Some Large Villages will be constrained as a result of existing allocations and commitments that would limit the local housing market's capability of accommodating growth to that village. Some Large Villages such as Baston have already delivered their commitments from the adopted Local Plan and would be well placed to accommodate further allocations in this Review. This differs to a Large village such as Barrowby where there are a up to 270 dwellings worth of existing allocations still to be delivered which would be a constraint to the level of growth that village could accommodate in this Local Plan review.

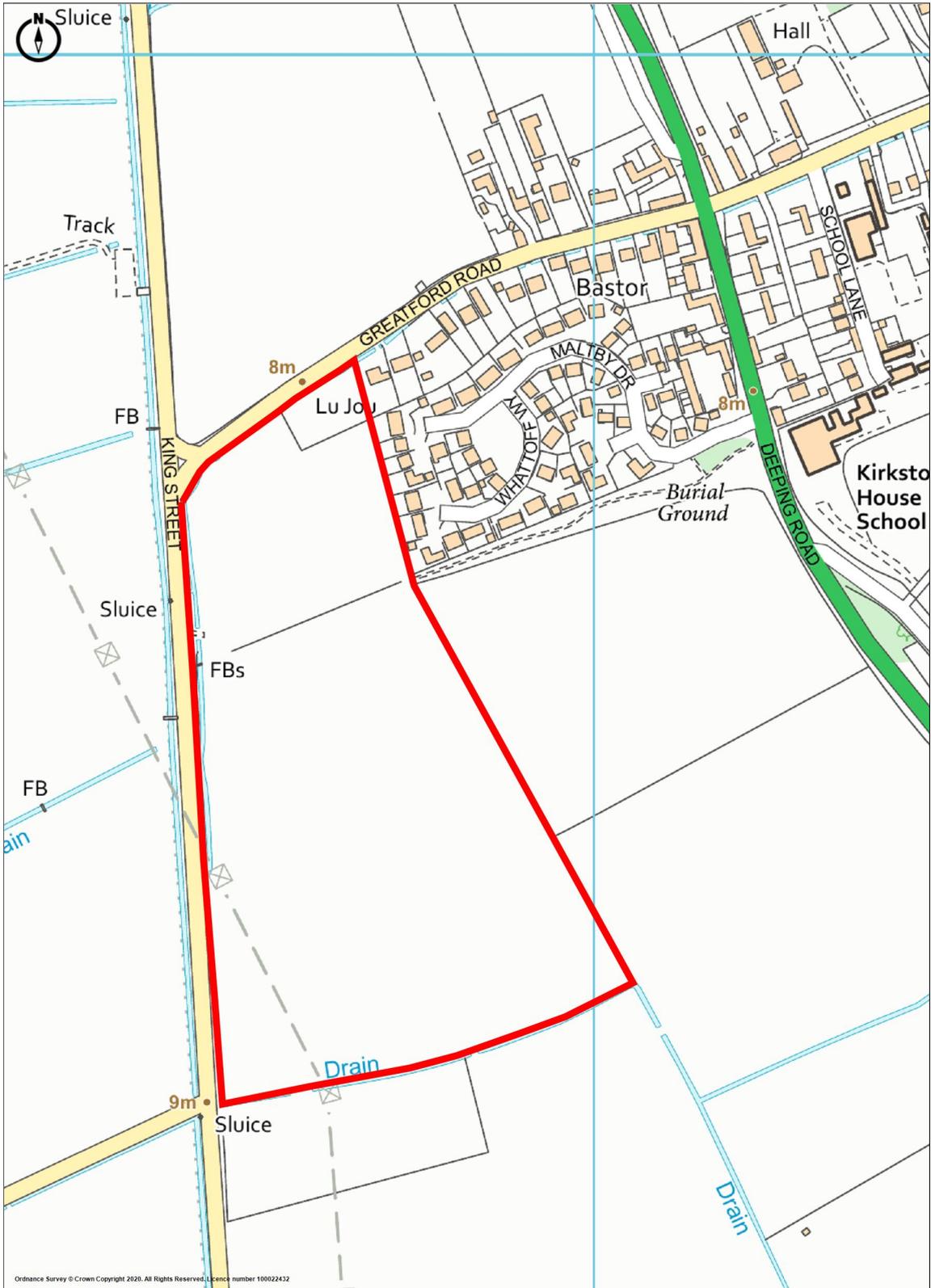
### **Question 7e – Consideration of the Market and Deliverability**

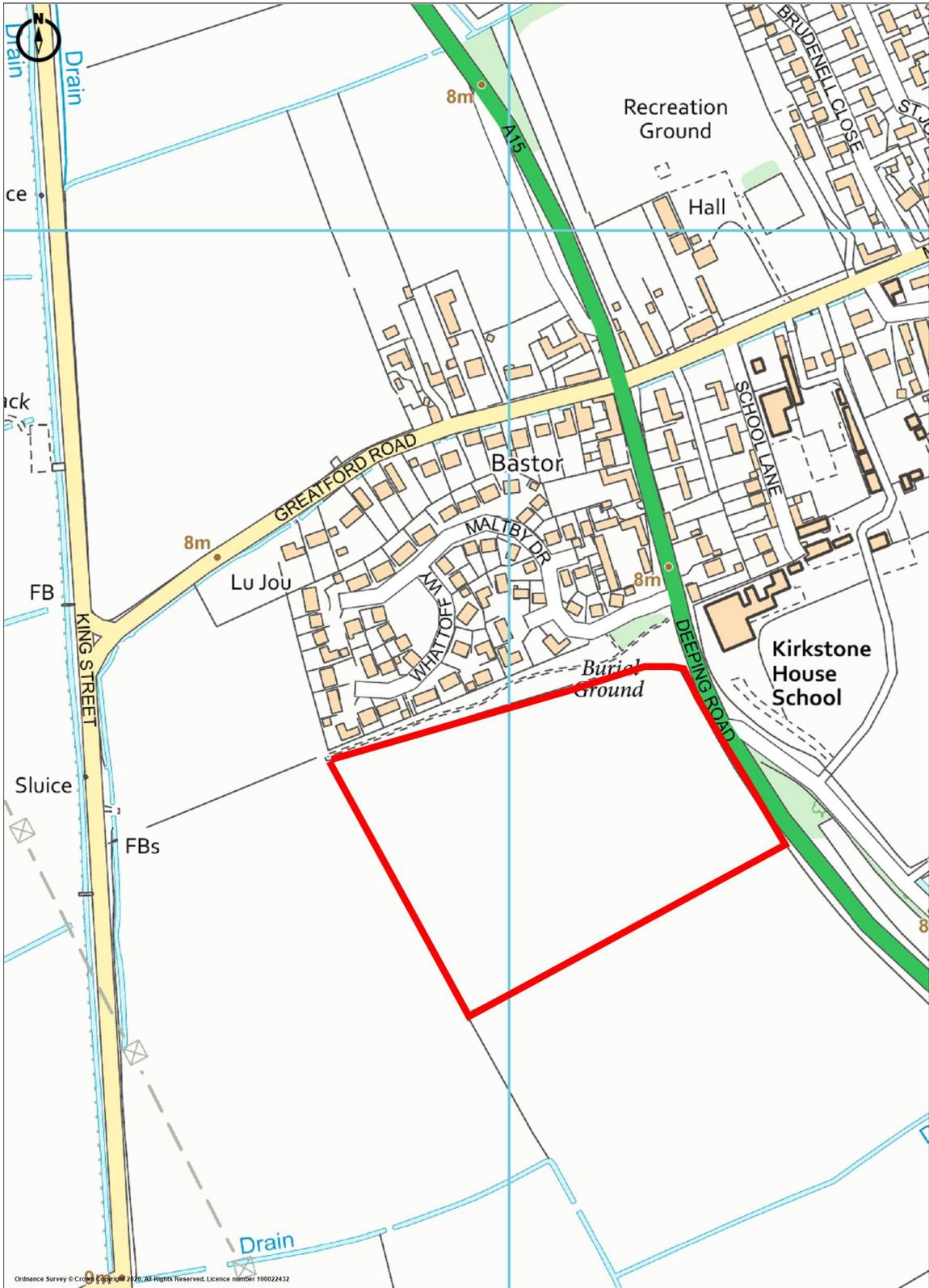
*Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area.*

- 3.23 This is essential, particularly given South Kesteven's poor record of delivery and the increase in housing requirement. For the Council to have any chance of significantly increasing their supply, more consideration should be had to the deliverability of sites. The Framework, in Paragraph 67 requires Local Plan's to identify specific deliverable sites for each five year period of the plan.
- 3.24 Since the start date of the adopted Local Plan the supply has been significantly below the annual housing requirement. The latest Housing Delivery Test score of 82% is the evidence of this. Clearly, there is a need to consider whether enough short-term sites are being allocated for early in the plan period. This is further justification for identifying more sites to Large Villages where sites of between 50 and 250 can be delivered in the short term with modest infrastructure in strong housing markets.
- 3.25 The large number of existing allocations and commitments needs to be considered to inform the Settlement Hierarchy, as this will affect the capacity for settlements to accommodate further growth. As referred to in earlier in our representations, Stamford may not have sufficient capacity to accommodate such a high percentage level of growth. Some Large Villages such as Barrowby have allocated land that is yet to come forward so it might not be appropriate to allocate further sites to these villages in this Plan Review.

## **APPENDIX ONE - SITE LOCATION PLAN**

Site Location Plan: Land Fronting Greatford Road, Baston





Ordnance Survey © Crown Copyright 2020. All Rights Reserved. Licence number 100022432

## **APPENDIX TWO - VISION DOCUMENT**



Boyer

# Land to the west of Deeping Road, Baston

Opportunity to create a healthy, integrated community

# Land to the west of Deeping Road, Baston

## Opportunity to create a healthy, integrated community

### UNDERSTANDING THE SITE AND DEVELOPMENT POTENTIAL

The village of Baston is located in South Kesteven, in the proximity of market towns - Bourne(N), Stamford(W) and Market Deeping (S). Baston is defined as a "Larger Village" in the adopted South Kesteven Local Plan, well located to key North-south route - A15, which also runs along the eastern boundary of the site. The site presents an exciting opportunity to create a contained development on the settlement edge which will provide up to 100 new homes and will be -

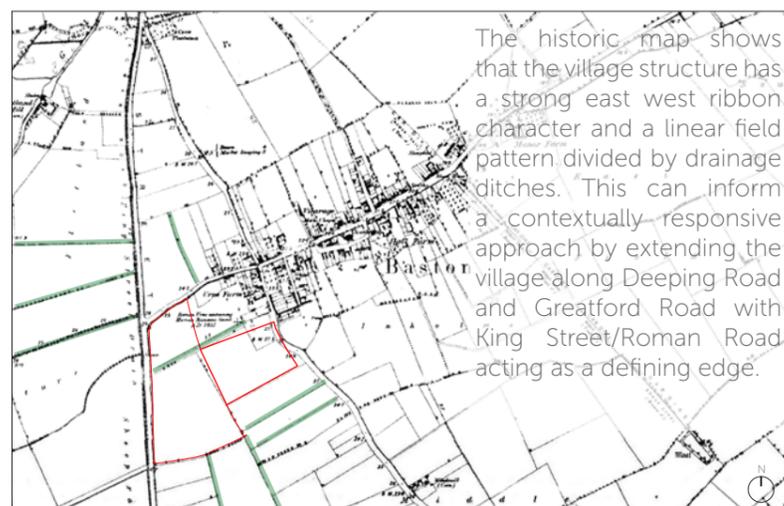
- well designed and appropriate in size / scale, layout and character to the setting and area;
- adjacent to the existing pattern of development for the area;
- appropriate to the environmental and heritage characteristics of Baston and the Fens landscape character area; and
- will provide a range of affordable new homes to meet local needs.

A second potential phase could accommodate 150 dwellings adjacent to Greatford Road to meet longer term needs.

This site relates well in that it does not extend any further west or south than the existing extent of the village and it fits nicely into the general character of the village. The access directly to the A15 would not impact the capacity of existing junctions or add any pressure to the existing centre.

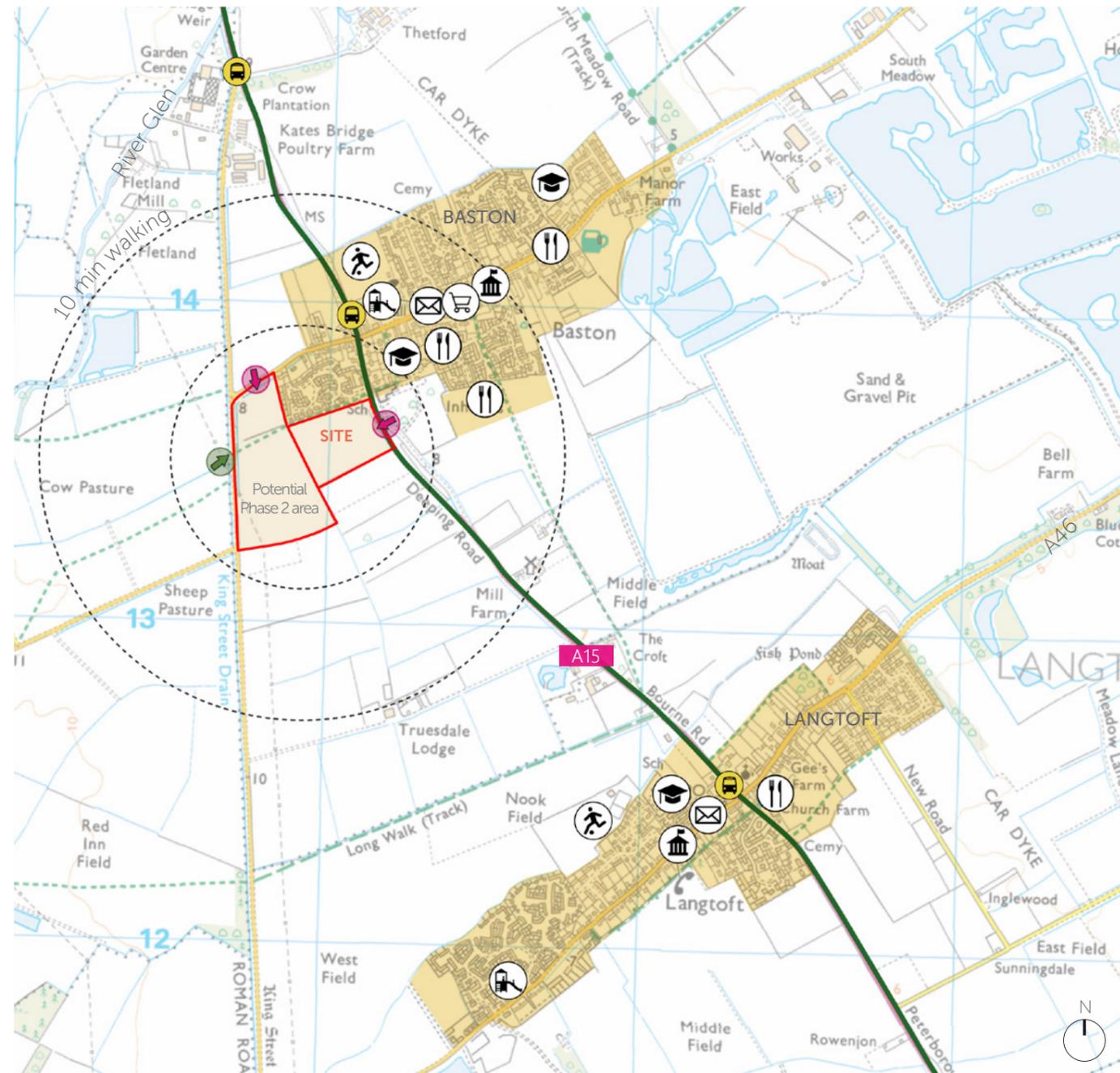


Wider context analysis



Baston 1883 Historic Map

The historic map shows that the village structure has a strong east west ribbon character and a linear field pattern divided by drainage ditches. This can inform a contextually responsive approach by extending the village along Deeping Road and Greatford Road with King Street/Roman Road acting as a defining edge.



Key

- |                 |                                |                       |                                     |
|-----------------|--------------------------------|-----------------------|-------------------------------------|
| Site boundary   | 5min/10 min walking Isochrone  | Restaurants/pubs/cafe | Sport pitches                       |
| Settlement      | Existing Bus Stops             | Shopping              | Potential vehicular access to site  |
| Primary Road    | Community Centre/ Village Hall | School                | Potential pedestrian access to site |
| Local Road      | Post Office                    | Equipped play area    |                                     |
| PRoW (Footpath) |                                |                       |                                     |

### PLANNING BENEFITS



The potential of a development with everyday life nestled in nature with enhanced visual links



Providing a wide range of new homes within a site specific bespoke residential development



Enhancing links, providing footpaths and creating a sustainable and integrated community

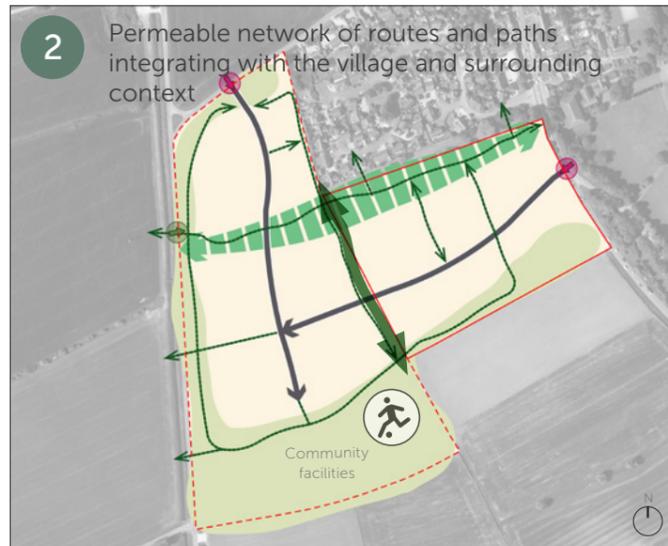


Providing publicly accessible amenity open space and recreation facilities which will benefit the existing village

# Land to the west of Deeping Road, Baston

Opportunity to create a healthy, integrated community

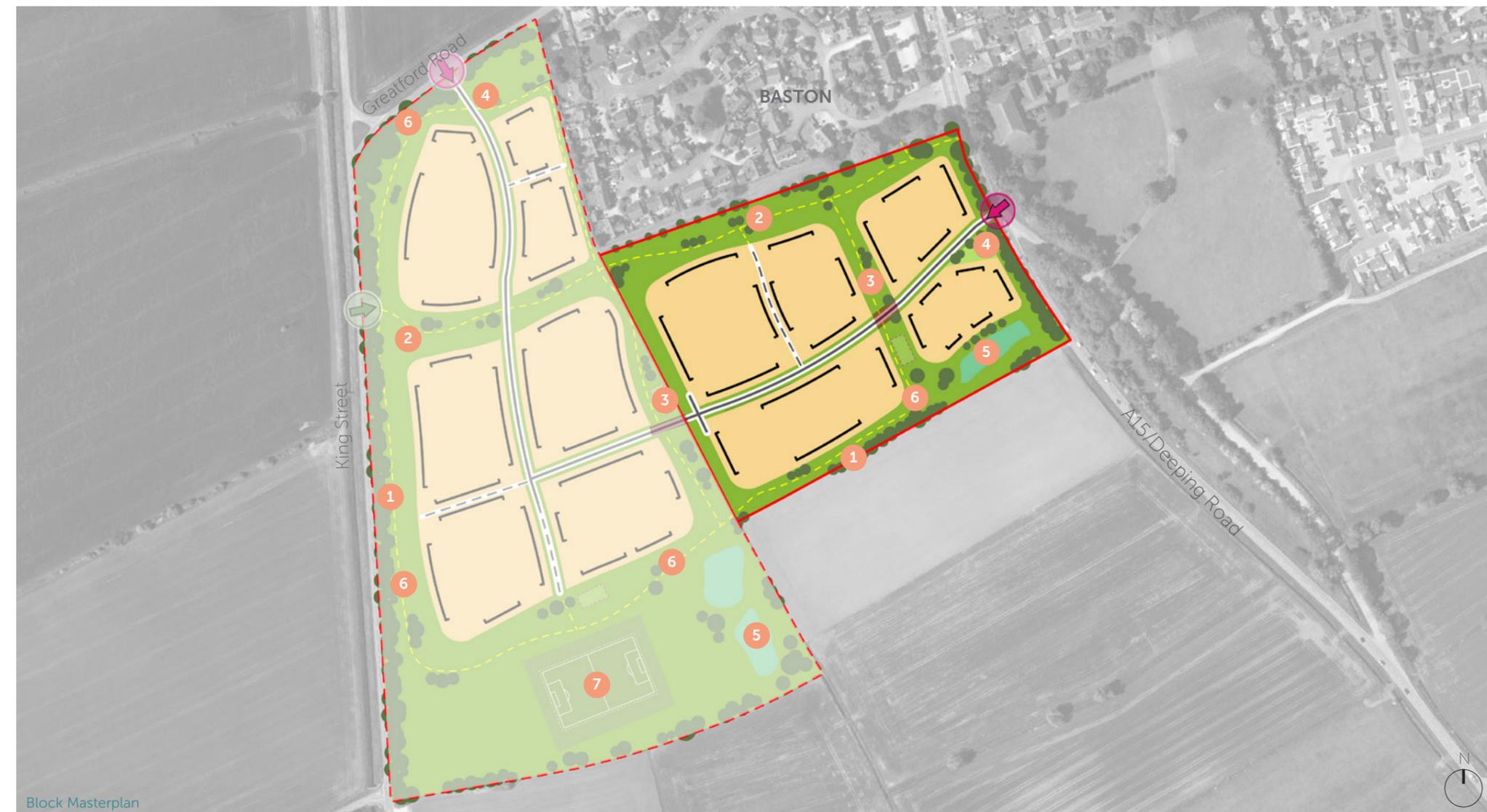
**EVOLVING DESIGN PRINCIPLES** A layering of the three evolving design principles below for both phases show how the concept masterplan can create a healthy and integrated community.



## FRAMEWORK MASTERPLAN

Land Use Schedule for Phase 1	Hectares
Residential Development Area	2.85
Residential Units (@ 35 dph)	100 units
Main Road	0.27
Public Open Space	1.86
<b>Gross Site Area for Phase 1</b>	<b>4.98</b>

Together with Phase 2 the site would become an integrated settlement and deliver up to 7.64Ha of Public open space and 7.16 Ha of Net Developable Area providing 250 new homes.



### KEY

- 1** Green Corridor along existing hedgerows to provide containment and define edge of development
- 2** East-West Green link as a main green corridor to connect and enhance biodiversity
- 3** New green corridors to provide doorstep green to every new home and bring the fen landscape into the site
- 4** Pocket green to create a sense of arrival
- 5** Attenuation basin located at the lowest point of the site
- 6** Footpath network to create a walking loop linking open green space with the wider village
- 7** Community recreation facilities / sports pitches

### Key

- Site boundary
- Access
- Primary Road
- Secondary Road
- Footpath network
- Frontages
- Attenuation basin
- Residential
- Traffic calming
- Amenity open space
- Park and Gardens
- Play area
- Sport facilities
- Trees and hedges
- Potential area of second phase

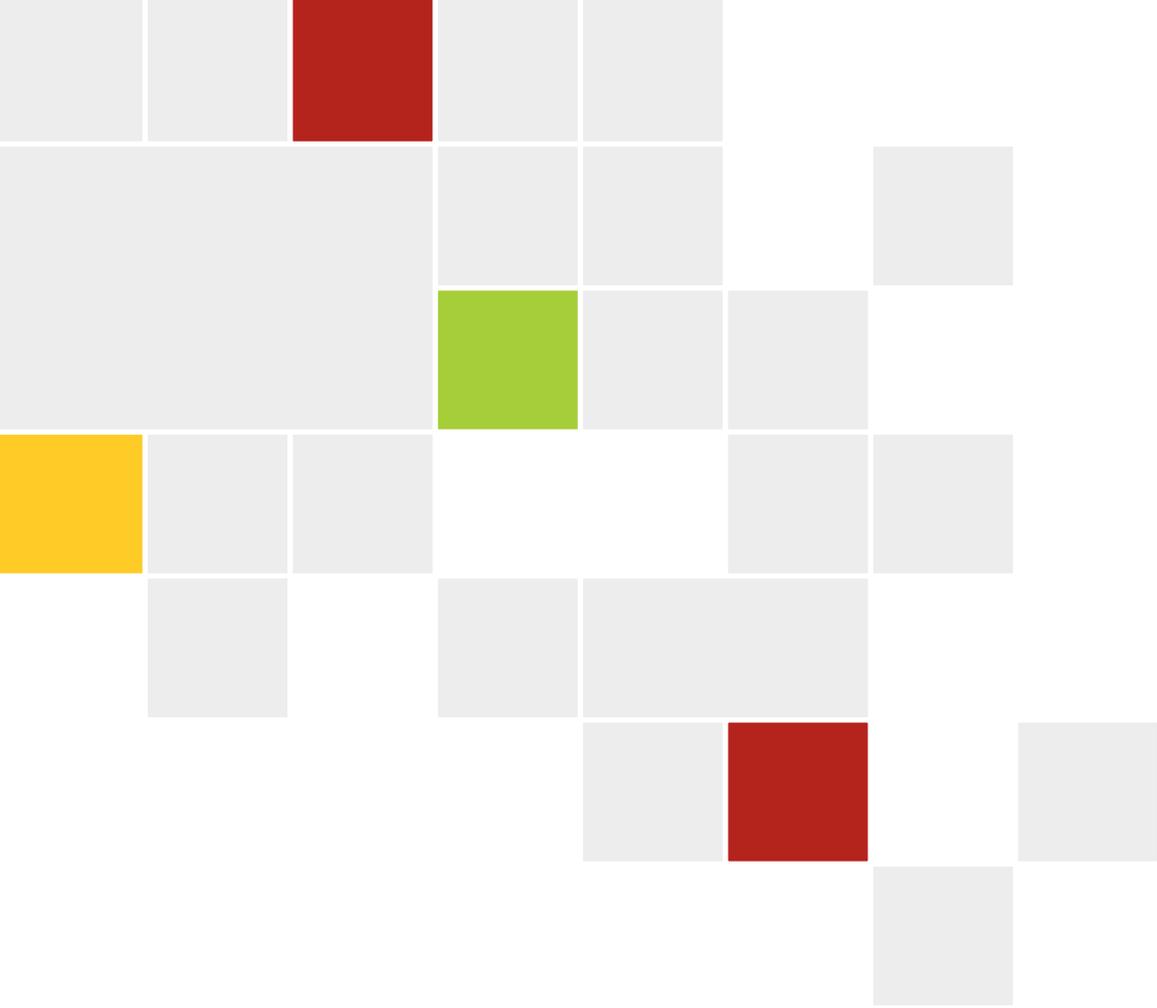
# Boyer

RIBA 

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Chartered Practice





Boyer



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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	Miss
First Name	T	Laura
Last Name	Wade	McCombe
Organisation		Boyer
Address	██████████ ██████████	████████████████████ ██████████████████
Postcode		██████████
Telephone		██████████
Email Address	██████████	████████████████████

**Please note:** that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	23/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
See attached submission.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
See attached submission.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
See attached submission.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
See attached submission.					

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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No	<input checked="" type="checkbox"/>	Unsure	
-----	--	----	-------------------------------------	--------	--

If not please provide details

See attached submission.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

If not, please provide details of what changes you think should be made.

See attached submission.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
-----	--	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

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**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please provide details

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

See attached submission.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details.

See attached submission.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	--------------------------

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	--------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

**Please give details.**

See attached submission.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

**Please give details**

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details**

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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**Please give details**

See attached submission.

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

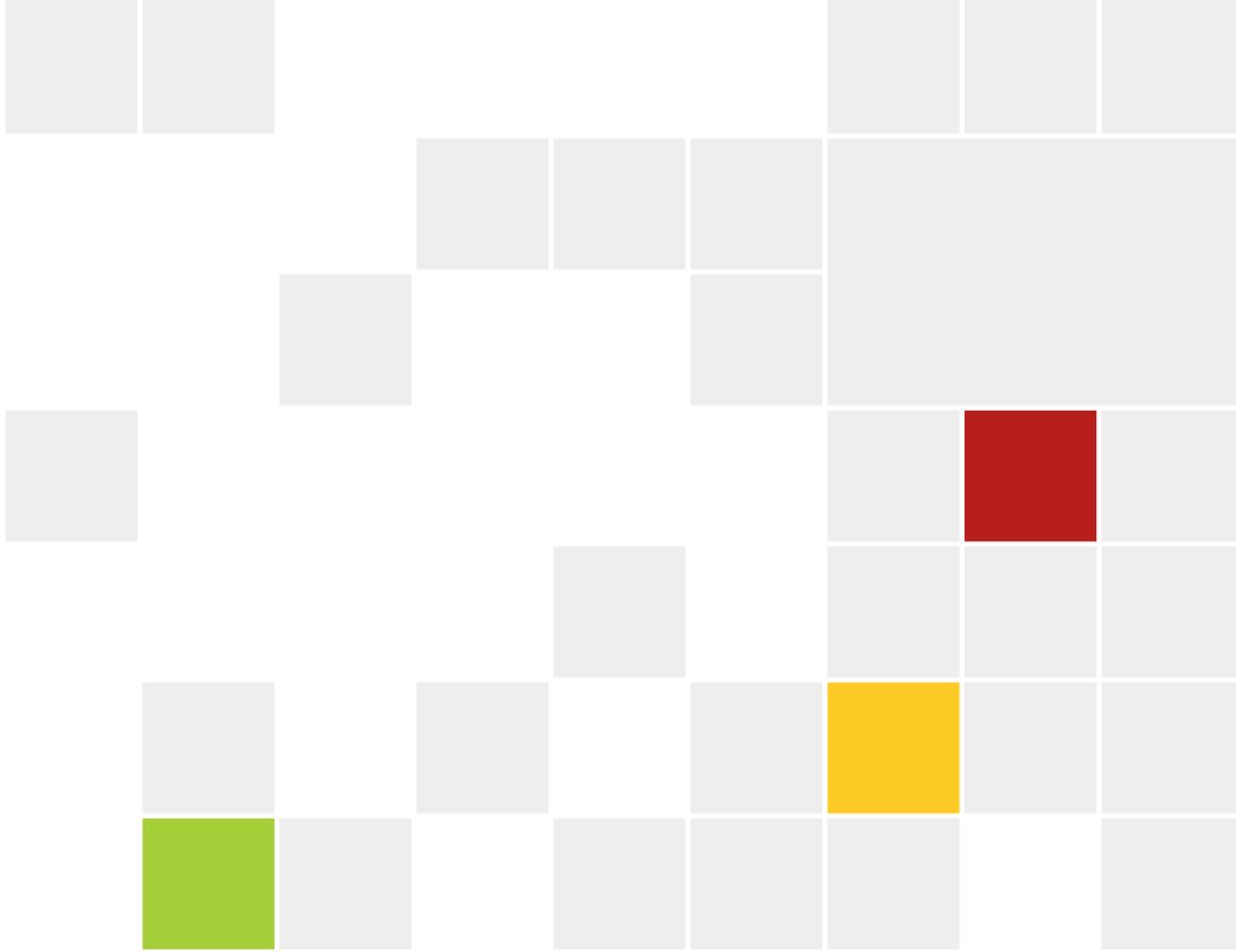
See attached submission.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

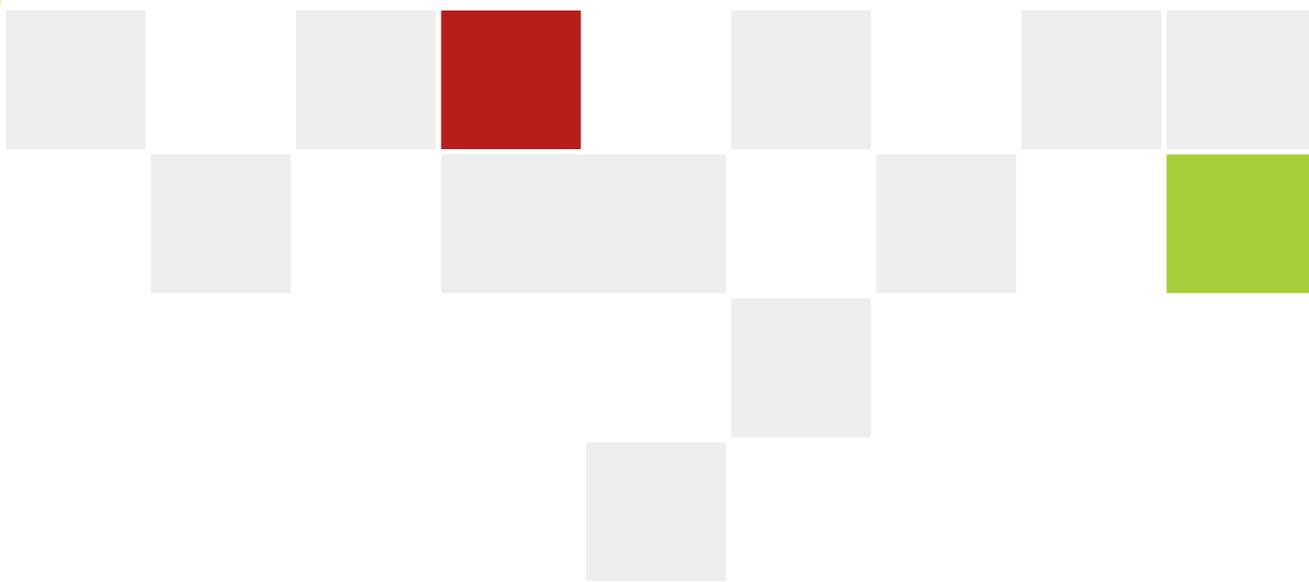
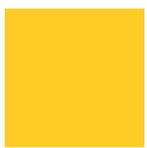
See attached submission.

**Thank you for responding to this consultation.**



# South Kesteven Local Plan Representations

Representations to the Issues and Options Report  
(October 2020)



**Boyer**

## Report Control

Project:	South Kesteven District Council Local Plan Representations
Client:	Tim Wade
Reference:	20.3034
File Origin:	
Primary Author	Raj Baines
Checked By:	Laura McCombe

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	17/11/2020	Draft	DH

## **TABLE OF CONTENTS**

1. Introduction	2
2. Response to Consultation Questions	4
3. Conclusion	11

## 1. INTRODUCTION

- 1.1 This Representation has been prepared by Boyer on behalf of Mr T Wade in respect of the South Kesteven Local Plan Review Issues and Options Report Consultation (2020).
- 1.2 The current Development Plan is the South Kesteven Local Plan (2011-2036) which sets out a long term vision and objectives to achieve the aspirations of the District and community. The Local Plan consists of strategic proposals and policies to help direct growth and development across the four market towns; Grantham, Stamford, Bourne, The Deepings and the smaller villages.
- 1.3 The Inspector's final report on the current Local Plan (2011-2036) commits the Council to undertake an early review from April 2020 with submission by the end of December 2023. Once adopted, this Local Plan will form part of the Development Plan and will replace the current Local Plan (2011 - 2036). The review is required to amongst other things update the evidence base in relation to employment land and identify changes in housing need and growth. The review will also examine the scope for changes to policies relative to climate change and changes that will support the recovery of the local economy following COVID 19.
- 1.4 The Council published their Local Development Scheme in August 2020 which sets out a projected timescale for the Local Plan Review. It identified the following consultation periods; Issues and Options Local Plan (Regulation 18) in October 2020, Draft Local Plan (Regulation 18) in August 2022 and Pre-submission Local Plan in April 2023 with a submission in December 2023 (Regulation 22). Following which the entire calendar year has been identified for the examination period (Regulation 24) with an adoption in December 2024 (Regulation 26).
- 1.5 This representation is coupled with a Call for Sites Submission which promotes Land at Gonerby Lane, West of the A1, Gonerby Moor as a strategic employment site in Grantham for allocation in the new Local Plan (2041). The submission is supported by a Vision Document prepared by Boyer Design which includes a framework plan (please refer to Appendix 1) which demonstrates how the employment site could be delivered within the wider context.
- 1.6 The Site measures approximately 65ha and would form a further extension of employment land to Gonerby Moor (Policy E4 – Protection of Existing Employment Sites of the Local Plan including site EMP –R3). This would increase employment provision to help deliver economic growth in Grantham and support local and national economic objectives.
- 1.7 The key evidence base documents relevant to employment land is the Grantham Capacity and Limits to Growth Study Report (2015), Sustainability Appraisal (2020) and the Employment Land Study (2015), all of which are referenced in this representation.

1.8 The proceeding sections of this Statement addresses in turn each of the relevant questions in the Consultation Response Form for the South Kesteven Local Plan Issues and Options Report Consultation (2020) and although at an early stage it assesses whether the Local Plan Review (2041) is being prepared in accordance with legal and procedural requirements.

1.9 As set out in paragraph 35 of the Revised Framework (2019), Local Plans are considered 'sound' if they are;

*'a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.'*

## 2. RESPONSE TO CONSULTATION QUESTIONS

### Q1a – The Vision

*Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?*

- 2.1 We consider the Vision set out in the South Kesteven Local Plan (2011-2036) to be appropriate and positive. In addition to updating the vision to reflect the plan period and housing growth, as detailed throughout this representation, it is strongly contended that South Kesteven District Council should include additional allocations for employment land in Grantham.
- 2.2 Furthermore, the Vision should reflect the Council's approach towards rebuilding the local economy as a result of the COVID 19 economic crisis and how this will impact on the growth areas allocated within the plan. This topic has been covered in more detail in the proceeding sections.

### Q1b – The Vision

*Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?*

- 2.3 We would recommend that the Vision should reflect the Council's approach towards rebuilding the local economy as a result of the COVID 19 pandemic. There is a significant need for the planning system to be a key driving force behind the economic recovery. It is therefore essential that South Kesteven District Council's vision, objectives and subsequent planning policies are aspirational to support growth across all sectors and importantly ensure that they are deliverable.
- 2.4 With regards to climate change, it is considered that the vision is sufficient by seeking to direct development towards the most sustainable areas within the District, namely Grantham which is the Sub-Regional Centre.

### Q2 – Objectives

*Do you agree that the Objectives should remain the same for the new plan? If not please provide details.*

- 2.5 It is agreed that the objectives should remain the same for the new Local Plan. The objectives clearly set out the Council's approach of how and where growth will be directed throughout the District. We would further suggest that the objectives specifically reference the Council's approach to help rebuild the local economy following the recent economic challenges.

### **Q3 – Policies not proposed to be significantly changed**

- 2.6 It is agreed that the policies listed in paragraph 3.3 of the Issues and Options Report (2020) related to employment land only do not need to be amended.

### **Q4 – Plan Period**

*Do you agree with the proposed plan period up to 2041? If not please provide details*

- 2.7 The South Kesteven District Council Local Plan Review (2041) covers a period spanning 21 years from today. In accordance with the published Local Development Scheme, the Council are aiming to have the Plan adopted by December 2024. At which point, the Plan will cover a period of 17 years. As detailed in paragraph 22 of the Revised Framework (2019), strategic policies should look ahead over a minimum of a 15 year period from adoption.
- 2.8 Although the plan period complies with paragraph 22 of the Revised Framework (2019), it is important to reiterate that this is a minimum period. In order for the Council to achieve their growth aspirations, it would be prudent for the plan period to be extended. This would enable the Council to adopt a more proactive approach for planning for the long term needs of the District. Notwithstanding this, the minimal approach to the Plan period provides little flexibility should there be any unexpected delays during the plan making process.

### **Question 5 – Settlement Hierarchy**

*Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.*

- 2.9 It is strongly contended that the settlement hierarchy is a very useful planning tool for guiding development within the Borough and ensuring that a sustainable growth pattern is achieved. It is agreed that the majority of the development should be focused in Grantham in order to support and strengthen its role as a Sub-Regional Centre. Therefore, the settlement hierarchy should be retained within the new Local Plan and a focus on bringing forward additional employment land in this sustainable location should be paramount.

### **Q9a – Strategic Employment Allocations**

*Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?*

- 2.10 We agree that the strategic employment allocations set out in Policies E1 and E2 should be brought into the new Local Plan. The locations set out in these policies are fundamental to the Local Plan given their role, relationship with principal areas of growth and the strategic road network.
- 2.11 Nevertheless, whilst a large amount of employment land is allocated to Grantham Southern Gateway, there is very limited employment land allocations identified in the north or northwest of Grantham that would support economic growth in these areas in accordance with paragraph 8 of the Revised Framework (2019).
- 2.12 Given the significant increase in housing need as outlined in the Issues and Options Report Consultation (2020), it is essential that this growth is supported with sufficient employment opportunities for local people. Not only will this boost the economy as outlined above, it will also reduce the need for local residents to travel further afield for employment, thus contributing to achieving sustainable patterns of growth and travel.
- 2.13 As outlined in paragraph 1.3, the Inspector required South Kesteven to undertake an early review of their Local Plan. One of the reasons for this was to update the Employment Land Study (2015). A review of the Employment Land Study could potentially identify a shift in employment land requirements relative to suitability and land availability in South Kesteven. In light of the COVID 19 economic crisis and increasing number of unemployment rates coupled with the impact of post Brexit deals, it is inevitable a change in the employment land study would suggest a greater need for attractive, accessible employment land to help rebuild the economy. Furthermore, with more businesses operating from home, the need for offices would be less, whereas changes in consumerism and online purchases would potentially indicate an increase for warehouse and distribution premises.
- 2.14 Whilst we support the land allocations in Policies E1 and E2, we strongly contend that additional employment land provision is required in Grantham to support housing growth levels particularly in the north and northwest of Grantham. As such, there is a need for additional employment allocations in suitable locations which provide choice, good accessibility and competition, especially where changes in market and demand are occurring rapidly. The additional employment land allocations within the Local Plan must also provide diversification and overall support the growth of Grantham and the wider economy.

- 2.15 The Sustainability Appraisal (2020) states that *‘Grantham is a key employment centre for the District. A continued and renewed focus of growth within the town (facilitated through Option G1 and G2) would direct growth to a location with good access to employment and training opportunities. Provision of new housing and employment growth also has the potential to promote inward investment and entrepreneurial development into the town utilising its good transport links. This is significant given the existing regeneration opportunities within the town and ongoing issues regarding the town’s economic vitality’.*
- 2.16 As a sub-regional centre, the town also contains the broadest range of services, facilities and employment opportunities in the District. In this regard, continuing and increasing the focus of growth in Grantham will locate an increased proportion of growth in closer proximity to a broader range of services and facilities and public transport networks. This will help reduce the need to travel, and encourage the use of sustainable modes of transport, including walking, cycling and rail and bus use.
- 2.17 The Sustainability Assessment (2020) also concludes that either by continuing the main focus of the District’s growth in Grantham or renewing and increasing the focus scores higher against reducing the focus of growth on Grantham in all sustainability appraisal themes except biodiversity and geodiversity, landscape and historic environment. It is however considered that as detailed in the proceeding sections there is overwhelming benefits to delivering additional employment to the north west of Grantham and if necessary impacts can be mitigated against.
- 2.18 Taking the above into consideration, it is considered that our clients site, Land South of Gonerby Lane, West of A1, Gonerby Moor is a suitable location for allocation in the Local Plan (2041) as a Strategic Employment Site. The Site measures approximately 65ha and would form a further extension of employment land provision to Gonerby Moor (Policy E4 – Protection of Existing Employment Sites of the Local Plan including site EMP –R3). Allocation as a Strategic Employment Site would be consistent with the focus of Grantham as a Sub Regional Centre as set out within the Local Plan’s vision and economic objectives. It would also support the overarching principles of the Revised Framework (2019) by delivering sustainable development in accordance with the objectives set out in paragraph 8 and by building a strong and competitive economy as outlined in Chapter 6.
- 2.19 The Site forms part of Area 6 in the Grantham Capacity and Limits to Growth Study (2015).
- 2.20 The assessment established that all land within Area 6 consists of Grade 3 agricultural land. Grade 3 is classified as good to moderate quality agricultural land where yields are generally lower or more variable than on land in Grades 1 and 2.

- 2.21 Furthermore, the Site is considered to offer a significant scale of commercial development due to its strategic location and links to Peterborough (South), Nottingham (west) and Lincoln (north) within 30km distance via the existing highway (A1, A52 and B117A). The Site offers easy connectivity to the Motorway network including M1 and M18. The Sustainability Appraisal (2020) identifies Grantham as the best-connected settlement in the District by public transport networks. This is given the presence of the mainline railway station in the town and an extensive bus network.
- 2.22 There is potential to improve both the site and the rest of the Gonerby Moor employment area's accessibility by allocating this land and Land north of the A52 and west of the A1 (see separate representations and land identified in Vision Document). Both developments could facilitate a link road connecting the A1 at Gonerby Moor with the A52 that would allow vehicles to bypass the lower grade A52 / A1 junction, improving journey times and relieving congestion in Grantham. The wider proposal could also include the provision of Grantham Parkway Station that would further improve the accessibility of Gonerby Moor. There is also the potential to incorporate a freight terminal in to the wider Gonerby Moor employment site utilising the Skegness spur that runs adjacent to the site. The incorporation of a wider approach to accessibility, particularly by sustainable means of transport would have significant environmental benefits to assist with the Council's strategy of dealing with climate change and the Government's "Green Industries Revolution".
- 2.23 With regards to Heritage impacts. The assessment states that *'development west of the A1 would have to consider its potential impact on the conservation area and cluster of listed buildings at Allington, though given that the village is almost two miles west of the A1, such impact is likely to be limited unless the development is relatively tall.'* A more detailed assessment is required to determine the impact, taking into account the recent appeal decision relating to development of the eastern part of the Vale of Belvoir (Appeal ref: APP/E2530/A/13/2200452). Nevertheless, it's considered that mitigation measures can be put in place should the Council wish to pursue an allocation on the site.
- 2.24 As detailed in the assessment, area 6 is already an employment focused location with significant potential for development. The Employment land Study (2015) has scored land at Gonerby Moor well as a location for new employment development, making it suitable for new B8 uses and large footprint employment uses which would benefit from the strategic highway network. The assessment states that *'the B1174/A1 junction, would be in demand for B8 and to a much lesser extent B1 uses (which may benefit from being located closer to existing services and facilities). Locating new B8 uses here would be advantageous, as they tend to result in a significant number of heavy goods vehicle movements, and this area is the most remote from Grantham town centre and other residential areas.'*

2.25 The Sustainability Appraisal (2020) ultimately concluded that *'land within the 1km radius from the A1 junction and west of the A1, there is some potential for using the long, straight hedgerows east of Willowtrees House as a defensible boundary for development along the A1 and north of Gonerby Lane in this location. Subject to mitigation including an appropriate landscaping strategy and buildings not exceeding the height of the existing buildings at Downtown, this land is suitable as a contingency site for employment development.'*

2.26 Our client's site would offer a variety of mixed Commercial Development/ High Quality Business Park (storage and distribution, light manufacturing, roadside uses) and complement the existing employment uses on the opposite side of the A1. For the reasons outlined above Land South of Gonerby Lane, West of the A1 would be an appropriate location for an employment allocation,

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

*Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?*

2.27 A review of the Employment Land Study would be appropriate to determine the need, suitability and availability of the existing employment land allocations to the Local Plan.

**Question 11b – Energy Performance Standards in Non-Residential Development**

*Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?*

2.28 Climate change is a key challenge faced by South Kesteven District Council and is at the centre of Government planning policies and guidance.

2.29 Paragraph 12 of Planning Practice Guidance relating to Climate Change states that Council's are not restricted or limited in setting energy performance standards above building regulations for non-housing developments.

- 2.30 Nevertheless, consideration needs to be given to the potential implications of requiring higher energy performance standards, in particular the impact on build cost for all developers which in turns will impact on deliverability. In order for the Local Plan to be considered 'sound' at Independent Examination, paragraph 35 of the Revised Framework (2019) requires it to be positively prepared, justified, effective and consistent with national policies. Accordingly, it is imperative that the policies contained within the Local Plan are deliverable over the plan period. By creating too restrictive planning policies which will be costly for developers, it is likely to negatively impact upon deliverability of the Plan.
- 2.31 The new Local Plan should therefore not require higher energy performance standards in non-residential development.

### **Question 13 – Parking Standards**

*Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.*

- 2.32 It is agreed that minimum parking standards would be beneficial for the District. It is however imperative that such policy is flexibly worded to enable to decision makers to assess the planning application on their own merits as in some instances a lower parking standard may be considered acceptable.

### **3. CONCLUSION**

- 3.1 It is agreed that the Local Plan Review should continue to direct growth towards the most sustainable settlement which is Grantham.
- 3.2 Land South of Gonerby Lane, West of the A1, Gonerby Moor is a suitable site for allocation to the Local Plan as a Strategic Employment Site. The Site measures approximately 65ha and would provide a significant scale of employment growth and development for South Kesteven and the wider area. Most importantly, the Site would be crucial in supporting Grantham's role as a Sub-Regional with the availability and deliverability of additional employment land.
- 3.3 The Site is located in a highly suitable and recognised area for employment development. This is supported by the Grantham Capacity and Limits to Growth Study Report (2015) and the Employment Land Study (2015). It is strategically connected to the local and wider area and would complement the existing employment base surrounding the A1 corridor.
- 3.4 There are significant strategic infrastructure opportunities to improve accessibility to the site and the wider Gonerby Moor Employment Site through the allocation of this land and a strategic approach to developing our client's wider landholdings. Possibilities include a link road connecting the A1 Gonerby Moor Junction directly with the A52, a Grantham parkway station and a rail freight terminal. This would take a long-term strategic approach to the wider area but has significant economic, social and environmental potential that could benefit Grantham as a whole.
- 3.5 The Site would form a further extension of employment land to Gonerby Moor (Policy E4 – Protection of Existing Employment Sites of the Local Plan including site EMP –R3) increasing employment provision to help deliver economic growth in Grantham and supporting the economic objectives of the Local Plan.
- 3.6 Overall, this is a highly accessible, sustainable and deliverable opportunity to create a new Strategic Employment Site that would go hand in hand with current and future housing proposals in Grantham.
- 3.7 Finally, in order to ensure the plan is positively prepared, justified, effective and consistent with national policy, the Council should give due consideration to this representation and associated Call for Sites submission.

# **APPENDIX ONE – LAND SOUTH OF GONERBY LANE, WEST OF THE A1, GONERBY MOOR – VISION AND DELIVERY DOCUMENT**

Boyer

RIBA   
Chartered Practice



Land south of Gonerby Lane and west of A1  
Gonerby Moor, Grantham

Opportunity for Mixed Commercial Development

## UNDERSTANDING THE POTENTIAL

- The Site sits adjacent to the A1 and benefits from existing access off this A road and off the B1174 that connects further east into Great Gonerby and Grantham. The B1174 also connects the Site with the existing retail and light industrial uses located opposite
- The Site could accommodate B1, B2 and B8 uses complementary to those existing on the site to the east of the A1. Additional employment uses will create new jobs within the region within short travel distances from existing and potentially new development areas to the south
- There is the potential for a new pedestrian and cycle link to connect the new employment area with new developments, and the villages of Sedgebrook and Barrowby to the south
- Employment uses on this location will support the potential for a new train station at the intersection of the southern railway lines serving the Nottingham-Peterborough and the Nottingham-Skegness routes. A new train station on this location will strongly reduce the need for the car, providing new employees living further away the opportunity for a more sustainable journey to work

### Wider benefits

### Wider context plan



## THE VISION

- Light industrial uses will be located to the east of the Site adjacent to the A1, with offices and uses that require smaller buildings located to the west. This building arrangement together with a peripheral green buffer will assist minimise the visual impact on the open land to the west
- A couple of existing ditches traverse the site from east to west. New green corridors will be created along these features to provide soft landscaped areas, natural permeability and a more pleasant and attractive working environment for new employees
- A new pedestrian and cycle link will be created to connect the new employment area with existing and new developments to the south, and with the potential new train station

### KEY

- 1 Potential access point and gateway into the new employment area
- 2 Area for large B2/B8 units
- 3 Area for smaller units/office buildings
- 4 Green corridors following existing ditches and hedges
- 5 Green buffer along the A1 frontage to enhance the setting of the existing public footpath
- 6 Peripheral green buffer
- 7 Potential for new pedestrian and cycle link to the south

### Concept framework



Towards potential new developments and train station

Not to scale - November 2020



Boyer



For Official Use Only:

REF: SK.IAO.0074

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	Miss
First Name	Nick and Tim	Laura
Last Name	Wade	McCombe
Organisation		Boyer
Address		<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 2px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 2px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div>
Postcode		<div style="background-color: black; width: 50px; height: 15px;"></div>
Telephone		
Email Address	<div style="background-color: black; width: 150px; height: 15px; margin-bottom: 2px;"></div> <div style="background-color: black; width: 200px; height: 15px;"></div>	<div style="background-color: black; width: 280px; height: 15px;"></div>

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 80px; height: 15px;"></div>	23/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					
Please refer to response set out in attached representation.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input checked="" type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	
If not please provide details.					
Please refer to response set out in attached representation.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					
Please refer to response set out in attached representation.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	<input checked="" type="checkbox"/>	Unsure	
If not please provide details.					
Please refer to response set out in attached representation.					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					

**Do you agree with the proposed plan period up to 2041?**

Yes		No	<input checked="" type="checkbox"/>	Unsure	
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**If not please provide details**

Please refer to response set out in attached representation.

## 9. Proposal 5 – Settlement Hierarchy

### Q5a – Settlement Hierarchy

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

Yes	<input checked="" type="checkbox"/>	No		Unsure	
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**If not, please provide details of what changes you think should be made.**

Please refer to response set out in attached representation.

### Q5b – Settlement Hierarchy Methodology

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not, please provide details of what changes you think should be made.**

### Q5c – New Settlement

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

**If so, please outline any suitable and deliverable proposals.**

Please refer to response set out in attached representation.

## 10. Proposal 6 – Housing Need and Requirement

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No	<input checked="" type="checkbox"/>	Unsure	
-----	--	----	-------------------------------------	--------	--

**If not, what evidence do you have to justify an alternative need and requirement?**

Please refer to response set out in attached representation.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

**If not, please provide details and any alternative proposals.**

Please refer to response set out in attached representation.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
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**If not, please provide details and any alternative proposals.**

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not, please provide details and any alternative proposals.**

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7e – Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

Please provide details

Please refer to response set out in attached representation.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No	<input checked="" type="checkbox"/>	Unsure	
-----	--	----	-------------------------------------	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

Please refer to response set out in attached representation.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

#### 16. Proposal 12 – Need for Caravan Accommodation

##### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes

No

Unsure

Please give details

#### 17. Proposal 13 – Parking Standards

##### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes

No

Unsure

Please give details

Please refer to response set out in attached representation.

#### 18. Any other Comments

##### Q14 – Any other Comments

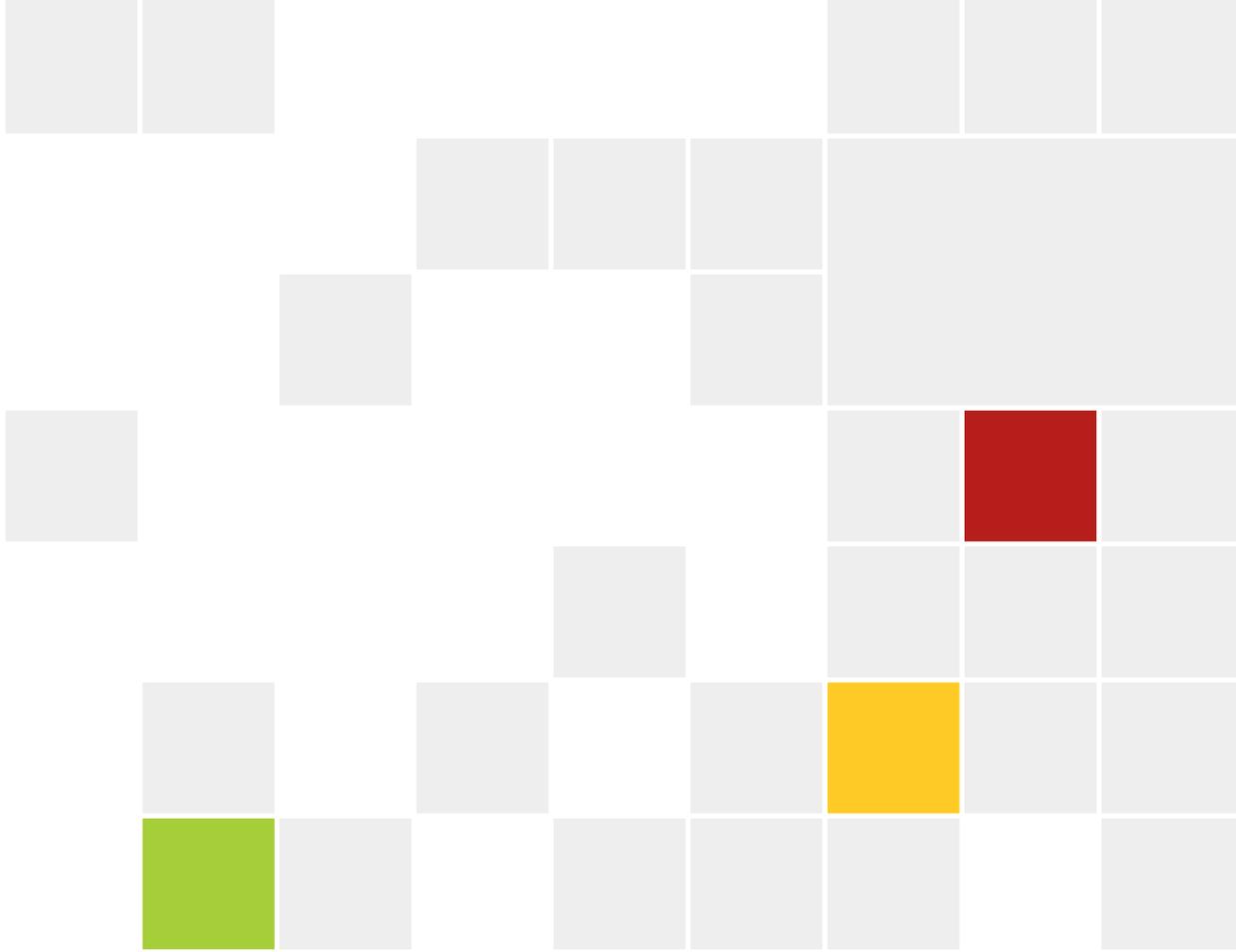
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Please refer to response set out in attached representation.

**19. Comments about the Sustainability Appraisal Scoping Report**

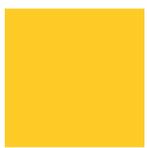
**Please refer to response set out in attached representation.**

**Thank you for responding to this consultation.**



# South Kesteven Local Plan Representations

Representations to the Issues and Options Report  
(October 2020)



**Boyer**

## Report Control

Project:	South Kesteven District Council Local Plan Representations
Client:	Nick and Tim Wade
Reference:	
File Origin:	20.3030
Primary Author	Laura McCombe
Checked By:	

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	11/11/2020	Draft	DH

## **TABLE OF CONTENTS**

1. Introduction	2
2. Reesponse to Consultation questions	4
Question 1a – The Vision	4
Question 1b – The Vision	4
Question 2 – Objectives	4
Question 3 – Policies not proposed to be changed significantly	4
Question 4 – Plan Period	5
Question 5a – Settlement Hierarchy	6
Question 5c – New Settlement	6
Question 6 – Housing Need and Requirement	15
Question 7a – Distribution of Growth	17
Question 7e – Consideration of the Market and Deliverability	17
Question 11a – Energy Performance Standards in Residential Development	18
Question 13 – Parking Standards	19
3. Conclusion	21

## **APPENDIX**

Appendix 1 – Site Location Plan

Appendix 2 – Vision Document

## 1. INTRODUCTION

- 1.1 This Representation has been prepared by Boyer on behalf of Mr N. and Mr T. Wade in respect of the South Kesteven District Council Local Plan Review (2041) Issues and Options Consultation.
- 1.2 The current Local Plan which sets out the development strategy for South Kesteven was adopted in January 2020. The Inspector's final report on the current Local Plan (2011 - 2036) commits the Council to undertake an early review from April 2020 with submission by the end of December 2023. Once adopted, this Local Plan will form part of the Development Plan and will replace the current Local Plan (2011 - 2036).
- 1.3 As outlined by South Kesteven District Council, the Local Plan Review will establish the planning framework for the District up until 2041. It will cover key issues such as housing provision, retail and town centres, infrastructure provision and the environment. As part of which, it will allocate land for housing, employment and retail uses and set out policies which planning applications will be determined against in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, section 70(2) of the Town and Country Planning Act 1990 and paragraph 2 of the Revised Framework (2019).
- 1.4 The Council published their Local Development Scheme in August 2020 which sets out a projected timescale for the Local Plan Review. It identified the following consultation periods; Issues and Options Local Plan (Regulation 18) in October 2020, Draft Local Plan (Regulation 18) in August 2022 and Pre-submission Local Plan in April 2023 with a submission in December 2023 (Regulation 22). Following which the entire calendar year has been identified for the examination period (Regulation 24) with an adoption in December 2024 (Regulation 26).
- 1.5 Our client controls Land north of A52, Grantham which is being promoted as a sustainable new settlement. The full extent of the site is shown on the Site Location Plan in Appendix 1. It extends approximately 133 hectares and is accessible from the A52 to the south. The site is well contained by physical features as its southern boundary is denoted by the A52, the eastern boundary abuts the A1 and its northern boundary adjoins the railway line. It is strategically located within 2 miles of Grantham along the A52 which is already an established bus route.

- 1.6 Although not forming part of these representations, our clients' own significant further adjoining land north of the railway line as marked in blue in the accompanying vision document that can be made available for residential development if there is a desire from the Council for a larger new settlement proposal. This is the land between the separate employment proposal south of Gonerby Lane and the railway line that abuts the northern boundary of the site.
- 1.7 The proceeding sections of this Statement address in turn each of the relevant questions in the South Kesteven District Council Local Plan Review Issues and Options Report (2020) and although at an early stage it assesses whether the Local Plan Review (2041) is being prepared in accordance with legal and procedural requirements.
- 1.8 As set out in paragraph 35 of the Revised Framework (2019), Local Plans are considered 'sound' if they are;
  - a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.'
- 1.9 In addition to this Representation, Boyer have submitted the aforementioned site as part of the Call for Sites consultation, which is running parallel with the South Kesteven District Council Local Plan Review (2041) Issues and Options Consultation. The Call for Sites submission is supported by a Vision Document prepared by Boyer Design which sets out the development framework for the proposed new settlement (see Appendix 2).

## 2. REESPONSE TO CONSULTATION QUESTIONS

### Question 1a – The Vision

*Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.*

- 2.1 It is broadly agreed that the vision should be the same for the new plan with updates to reflect the plan period, growth level and changes to allocations. Within the updates, as detailed throughout this representation, it is strongly contended that South Kesteven District Council should include the delivery of a new settlement as part of their overall vision to meet the identified housing need. This topic has been covered in more detail in the proceeding sections.

### Question 1b – The Vision

*Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District? If not please provide details.*

- 2.2 It is considered that the current vision sufficiently addresses climate change by seeking to direct development towards the most sustainable areas within the District, namely Grantham which is the Sub-Regional Centre.
- 2.3 Evidently, as a result of the Covid-19 pandemic, there is a significant need for the planning system to be a key driving force behind the economic recovery. It is therefore essential that South Kesteven District Council's vision, objectives and subsequent planning policies are aspirational to support growth across all sectors and importantly that they are deliverable.

### Question 2 – Objectives

*Do you agree that the Objectives should remain the same for the new plan? If not please provide details.*

- 2.4 It is agreed that the objectives can remain the same for the new Local Plan.

### Question 3 – Policies not proposed to be changed significantly

*Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.*

- 2.5 It is agreed that the majority of the policies listed in paragraph 3.3 of the Issues and Options Report (2020) do not need to be amended significantly with the exception of the policies referred to in the proceeding paragraphs.

- 2.6 Policy H3 (Self and Custom Build Housing) requires sites of 400 or more units to provide at least 2% of plots as self and custom build housing. Should the Council agree that a new settlement is the most appropriate strategy for delivering growth, it is not considered this policy is appropriate and the requirement should be removed.
- 2.7 First and foremost, the need for self and custom build plots must be re-assessed as part of the Local Plan review to ensure it is based on the most up-to-date and accurate evidence base. Consideration must be given to the potential for individuals and organisations to register with more than one Council so there is a possibility of double counting.
- 2.8 The register may indicate a level of expression of interest in self and custom build but it cannot be reliably translated into actual demand should such plots be made available. Although the policy has the following caveat *'where it is demonstrated that a plot has been marketed for at least 12 months but has not sold as a self-build /custom build plot the developer may seek to have that plot returned to normal market use'* this is going to have a significant impact on delivery in terms of bringing dwellings into use in a timely manner and resulting in undue financial burden on the developer when the plot can be returned to normal market use.
- 2.9 Moreover, it is not considered appropriate for new settlements to provide self/custom build plots because during the construction phase there will be multiple developers and contractors operating on site and from a practical and health and safety perspective this will cause significant implications.
- 2.10 Notwithstanding the above, preferences of those on the register is often individual plots in rural locations as opposed to new settlements.

#### **Question 4 – Plan Period**

*Do you agree with the proposed plan period up to 2041? If not please provide details*

- 2.11 The South Kesteven District Council Local Plan Review (2041) covers a period spanning 21 years from today. In accordance with the published Local Development Scheme, the Council are aiming to have the Plan adopted by December 2024. At which point, the Plan will cover a period of 17 years. As detailed in paragraph 22 of the Revised Framework (2019), strategic policies should look ahead over a minimum of a 15 year period from adoption.

2.12 Although the plan period complies with paragraph 22 of the Revised Framework (2019), it is important to reiterate that this is a minimum period. In order for the Council to achieve their growth aspirations, it would be prudent for the plan period to be extended. This would enable the Council to adopt a more proactive approach for planning for the long term needs of the District, in particular with regards to the delivery of housing as part of new settlements or significant extensions to existing settlements which is outlined in paragraph 72 of the revised Framework (2019) as being one of the best mechanisms to significantly boost the supply of homes. Notwithstanding this, the minimal approach to the Plan period provides little flexibility should there be any unexpected delays during the plan making process.

2.13 Thus, the Council should extend the plan period beyond 2041.

#### **Question 5a – Settlement Hierarchy**

*Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.*

2.14 It is strongly contended that the settlement hierarchy is a very useful planning tool for guiding development within the Borough and ensuring that a sustainable growth pattern is achieved. It is agreed that the majority of the development should be focused in Grantham in order to support and strengthen its role as a Sub-Regional Centre as detailed in the response to Question 7a. Therefore, the settlement hierarchy should be retained within the new Local Plan with amendments to include a new settlement on the edge of Grantham as per the response to Question 5c.

#### **Question 5c – New Settlement**

*Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles? If so, please outline any suitable and deliverable proposals*

2.15 It is strongly contended that given the scale of housing growth to be provided within the District, amending the Settlement Hierarchy to include a new settlement or garden village is the most appropriate course of action.

2.16 As detailed in paragraph 4.14 of the Issues and Options Report (2020), the housing need figure is 754 dwellings per annum which is 16.6% higher than the one in the current adopted Local Plan (2011-2036). As conceded by the Council, the new housing need figure '*represents a rate of housebuilding not experienced in South Kesteven since the recession of 2008*'. It is therefore evident that the Council need to give due consideration of how they are going to meet their housing requirements.

2.17 Furthermore, 754 dwellings per annum is a minimum number to be planned for and delivered. As detailed in national planning policy and guidance, the standard method is a starting point for determining the number of homes required in an area. Paragraph 10 of Planning Policy Guidance relating to Housing and Economic Development Needs Assessments states that the standard method *'does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.'* There is a need for the Council to opt for a higher housing need figure as a result of its previous poor rates of delivery and in order to provide an economic uplift in response to the Covid-19 pandemic and the subsequent need for the Local Plan to facilitate growth and support the economic recovery in line with local and national aspirations. A more comprehensive assessment of the housing need figure has been detailed in our response to Question 6.

At the heart of the Revised Framework (2019) is the need to achieve sustainable development which includes significantly boosting the supply of homes. Paragraph 72 states that; *'the supply of large numbers of new homes can often be best achieved through planning for larger scale developments, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

*a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*

*b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*

*c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*

*d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)<sup>35</sup>; and*

*e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.'*

- 2.18 Accordingly, it is strongly contended that the Council need to foster a positive and proactive approach by significantly boosting the supply of homes and allocating a new settlement along with other suitable allocations to meet the Council's housing need and contribute towards achieving sustainable development in line with the economic, social and environmental objectives outlined in paragraph 8 of the Revised Framework (2019).
- 2.19 As detailed in paragraph 1.5 of this Statement, our client controls land north of A52, Grantham which is being promoted as a sustainable new settlement. The site has been submitted to the Call for Sites Consultation and is supported by a Vision Document prepared by Boyer Design to show how the site could be delivered. The Framework Plan demonstrates that the site has the potential to deliver approximately 2500 dwellings along with a new local centre and school. It would have two points of access from the A52 and would incorporate high levels of green infrastructure. It also has the potential to provide a new "parkway" railway station for Grantham by utilising its unique strategic feature of being located on the Nottingham to Grantham railway line and the A52.
- 2.20 The proceeding paragraphs assess the site against the requirements for a new settlement outlined in criteria a-e contained within paragraph 72 of the Revised Framework (2019).
- 2.21 Given the sites position within a close proximity to Grantham which is identified as a Sub-Regional centre at the top of the settlement hierarchy it would clearly meet the overarching requirements of paragraph 72 of the Framework (2019) to be an appropriate location to deliver a new settlement. It is also supported by the necessary infrastructure and facilities.

- 2.22 **Criteria a** – In relation to planned or existing infrastructure the site already benefits from its strategic location adjacent to the A52 and A1. There is also the potential for a “parkway” railway station for Grantham at the heart of this site. In 2019, new franchisee East Midlands Railway increased the number of services on the Nottingham to Skegness via Grantham line. This increase is essential to the potential viability of a Parkway Station for Grantham as train services will need to have the frequency to encourage commuters to come off the A52 before Grantham. The use of a parkway station here could have considerable benefits to the town in terms of reduced congestion and improved air quality in the town centre. If planned properly the railway station could not only encourage commuters using the A52 to enter the town or access the East Coast Mainline by train but could also take cars off at the Gonerby Moor junction of the A1. This would relieve southbound traffic entering Grantham through Great Gonerby to access the town centre and railway station. This would only be possible by linking the separate employment proposal at Gonerby Moor to the proposed site so Gonerby Lane is be linked to the Parkway Station and A52 by a new spine road.
- 2.23 The proposed new settlement is situated on the edge of Grantham which is the District’s Sub-Regional Centre which in accordance with the vision for the existing Local Plan (2011 - 2036) is an area which is to be strengthened through significant housing and economic growth. Undoubtedly, creating a new sustainability settlement which delivers the services and facilities to meet the day to day needs of its local residents and in a location which is well connected to Grantham would contribute to increasing the area’s economic potential. The assessment of a new settlements impact on economic viability contained within the Sustainability Appraisal (2020) has been addressed in paragraph 2.29. With regards to net environmental gains, as concurred in the Sustainability Appraisal (2020) *‘the delivery of a new community on garden village principles offers opportunities for enhancements to biodiversity. This includes through enhancements to habitats and species through the delivery of high-quality green infrastructure provision and the implementation of a robust net gain principle through new development’*. As shown on the Vision Document at Appendix 2, the Framework Plan prepared for Land North of A52, Grantham is truly Green Infrastructure led in accordance with garden village principles which maximises the potential for environmental gains.
- 2.24 **Criteria b** – The site is able to deliver approximately 2,500 new homes which is a sufficient critical mass to ensure that associated facilities and services to support the new settlement can be viably delivered. It will create a sustainable community by providing access to services and employment opportunities within the site, its surrounding areas and in Grantham which the site has excellent access to. There is also the flexibility, within the same ownership to extend the site beyond 2500 dwellings by incorporating further land north of the railway line shown in blue in the Vision Document. This could result in up to 5000 dwellings.

- 2.25 **Criteria c** - Any forthcoming planning policies relating to the new settlement can secure the requirements of criteria c. Notwithstanding this, a new settlement undoubtedly would provide a high quantum of development and this enables a developer to viably deliver a high quality scheme which incorporates a wide range of house types, size and tenure to meet the needs of current and future households in the District.
- 2.26 **Criteria d** - By working proactively with landowners and developers, a new sustainable settlement could be delivered within a reasonable timeframe. However, the Council needs to be realistic in the delivery assumptions and lead in times associated with strategic scale developments. The Council must utilise reasonable and realistic delivery assumptions based on local and robust evidence. The lead in times for strategic development are well known and documented under the current planning system. The Council can therefore ensure this criteria is satisfied.
- 2.27 **Criteria e** - As part of the Local Plan Review process, the Council can make their own assessment as to whether it is appropriate to establish Green Belt around the new settlement. Allocating Green Belt is a significantly restrictive planning policy mechanism and it is not considered that it is required for land north of A52, Grantham. Notably, the Grantham Capacity and Limits to Growth Study (2015) states *that 'if the principle of extension beyond the A1 is accepted, the A52 would be a logical southern boundary and would help mitigate the risk of coalescence with Barrowby'* and *'to the north, the railway line is useful as a boundary'* which addresses purpose b of the Green Belt as identified in paragraph 134 of the Revised Framework (2019).
- 2.28 The Sustainability Appraisal (SA) for the South Kesteven Local Plan Review (October 2020) prepared by AECOM clearly states that *'depending on land availability, there may be scope to deliver a significant proportion of South Kesteven's housing and employment need through a new garden community in the District via an LPR allocation.'* It also acknowledges that such allocation would go beyond simply allocating housing and would provide the community with the following;
- job opportunities;
  - attractive green space and public realm areas;
  - transport infrastructure, including roads, buses and cycle routes;
  - community infrastructure, schools, community and health centres; and
  - a plan for long-term stewardship of community assets.

2.29 The assessment has considered two different options; option GC1 incorporates the delivery of a new community on garden village principles and option GC2 does not seek to deliver growth through such development. For each options AECOM have considered standard sustainability appraisal themes by providing commentary and ranking each option to be either the most favourable or least favourable. Boyer’s commentary on this assessment has been provided in the table below.

SA Theme	Boyer’s Commentary
Biodiversity and geodiversity	<p>It is agreed that the impact on this theme is dependent upon the location of the development.</p> <p>Land North of A52 would however provide a positive impact as it provides a clear opportunity to be a green infrastructure led development that would be capable of mitigating against any potential impacts and delivering biodiversity net gain.</p>
Landscape	<p>It is accepted that due to the scale of development delivered by a new settlement, it could have a negative impact on landscape character. However, as omitted in the Sustainability Appraisal, a potential location for the new garden community has not been considered and this is necessary to enable this theme to be fully assessed.</p> <p>In the case of Land North of A52, the site is well contained by the A52 to the south, A1 to the east and railway line to the north. These existing physical features along with existing and proposed landscaping presents an opportunity for the scheme to be well contained and genuinely green infrastructure led to ensure any impacts caused by the proposed development are mitigated against.</p>

<p>Historic Environment</p>	<p>It is agreed that the impact on the historic environment is dependent upon where the new settlement would be located. There are no heritage assets within the immediate vicinity of Land North of A52. Consideration does however need to be given to the impact upon Barrowby conservation area and Belvoir Castle. Although at an early stage of preparation, the submitted Framework Plan has been sympathetically designed to incorporate large swaths of open space to reduce any potential impact on the heritage assets.</p>
<p>Air, land, water and soil resource</p>	<p>We concur with AECOMs conclusion that <i>'the development of a new community on garden village principles offers significant opportunities for delivering sustainable drainage systems, green and blue infrastructure provision, and also support water efficiency, water saving and reuse infrastructure. Impacts on soils resources depend on the extent to which a new community is taken forward on previously developed or greenfield land, and the agricultural land classification of the land developed.'</i></p> <p>It is also important to note that the Land north of A52 falls entirely within Grade 3 agricultural land (see paragraph 2.31 below).</p>
<p>Climate change</p>	<p>The assessment acknowledges that to avoid significant increase in greenhouse gas emissions from transport, a new settlement would need to be accompanied by comprehensive measures to promote sustainable transport. This can be achieved at Land North of A52, given its close proximity to Grantham and the potential to provide sustainable rail and bus links as detailed in the call for sites submission. Furthermore, in order to minimise travel, facilities and services will be provided within the settlement itself to meet the day to day needs of local residents.</p>

<p>Population and community</p>	<p>Concerns have been raised that the development of a new settlement has the potential to create a community which is disconnected from existing settlements and the services and facilities they provide. This is highly dependent on where the new settlement is located. A new settlement within a close proximity to the Sub-Regional Centre will not result in an isolated settlement and this can be achieved at Land North of A52 which is situated under 2 miles from the centre of Grantham. The A52 corridor is also a bus route which can be connected to the site and there is a cycle path linking the A1 bridge with Grantham town centre. Moreover, as outlined in the Sustainability Appraisal, a new settlement provides an opportunity for critical mass to be delivered which enables developers to viable provide a range of facilities and services on site.</p>
<p>Health and wellbeing</p>	<p>The assessment concludes that a new settlement falls down on this criteria because it would not deliver development within a close proximity to existing heath, recreation and leisure facilities. In Boyer’s view a new settlement would however incorporate high levels of infrastructure and provide the basic facilities to support resident’s health and wellbeing. Allocating a site within a close proximity to Grantham would undoubtedly overcome AECOMS concerns.</p>
<p>Transport</p>	<p>As per above, the creation of a new settlement outside of Grantham will not lead to it becoming disconnected or increase the need to travel as a range of facilities and services will be provided on site.</p> <p>We concur with the view that a new community developed on garden village principles also offers significant potential to deliver comprehensive walking and cycling networks, and facilitate linkages with new and existing public transport networks and indeed as set out in the accompanying call for sites submission this can be achieved at Land North of A52.</p>
<p>Economic Viability</p>	<p>The reasoning behind AECOM’S assessment of the economic viability is understood. However, a new settlement will clearly provide significant economic benefits and if located on the edge of Grantham it will continue to support its role as a Sub-Regional Centre.</p>

- 2.30 In addition to the above, the site has been assessed under area 5 (northwest of Grantham) of the Grantham Capacity and Limits to Growth Study (July 2015) prepared by AECOM.
- 2.31 The assessment establishes that all the land west of the A1, including Land North of A52, is entirely within Grade 3 Agricultural Land. Grade 3 is classified as good to moderate quality agricultural land where yields are generally lower or more variable than on land in Grades 1 and 2.
- 2.32 In terms of infrastructure, the western half of area 5 which includes our site would need to be supported by a new school and medical centre which as set out in the vision document could be achieved.
- 2.33 The study has identified that although there are no listed buildings or conservation areas within Area 5, development to the west of the A1 could have a potential to impact on the setting of Barrowby conservation area and its associated cluster of listed buildings, as they are on a hilltop overlooking the site from the south. There is also potential for development west of the A1 to impact on long views from Belvoir Castle and its grounds. A more detailed assessment is required to determine the impact, taking into account the recent appeal decision relating to development of the eastern part of the Vale of Belvoir (Appeal ref: APP/E2530/A/13/2200452). Nevertheless, it's considered that mitigation measures can be put in place and the Development Framework already shows large parcels of open space along the sites far eastern and western boundaries.
- 2.34 With regards to spatial opportunities and constraints, the study states that *'if the principle of extension beyond the A1 is accepted, the A52 would be a logical southern boundary and would help mitigate the risk of coalescence with Barrowby. To the north, the railway line is useful as a boundary and to the west Allington Lane is a strong defensible boundary in an otherwise relatively featureless landscape that would also protect against the risk of coalescence with Sedgebrook'*. Although Allington Lane has not been utilised as the western boundary, a forthcoming proposal would incorporate a high level of landscape along this boundary to provide containment.
- 2.35 The relevant aspect of the conclusion states *'this land, with good access to the A52 and A1, performs well on the economic development criterion, residential development, which tends to comprise lower building heights, is more likely to be suitable than employment development given the potential sensitivity of the site in heritage terms. As such, we consider this part of the valley floor north of the A52 to be suitable as a contingency site for residential development subject to the mitigating factors mentioned above. Due to its scale and location, it could be planned as a new garden village on a similar scale to nearby Sedgebrook and Barrowby'*.

- 2.36 For the reasons outlined above, South Kesteven District Council should amend the settlement hierarchy to include a new settlement and Land North of A52.

### **Question 6 – Housing Need and Requirement**

*Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven*

- 2.37 The Council's current plan sets out a need of 650 dwelling per annum which is the result of an uplift from the original target of 625 new homes a year because of a poor build-out rate between 2011 and 2018. This is rather than adopting the Government's standard methodology which would have required 767 dwelling per annum and the Council states it can therefore spread the shortfall (thus far) over the entire plan (to 2036) as opposed to a 5 year period.
- 2.38 However, when looking at the justification for the new 754 dwelling per annum target the Council is proposing this is based upon the 2014 household projections and the latest affordability ratio (currently 2018) in accordance with national policy. As the Council proposes that 2018 be used as a baseline for the plan period as it aligns to the evidence being used, is recent and therefore relevant to this plan review. This will need to be reviewed when newer household projections and affordability ratios are published.
- 2.39 When looking forward to these future adjustments to the Standard Method, it is assumed these would result in further increases from the current level and therefore the Council should seek to increase the figure of 754 to a higher number, to take account of likely future increases in the local housing need.
- 2.40 This is because the affordability ratio in the area has increased from 6.89 in 2011 to 8.16 in 2019, which represents a 16% increase over 8 years, according to the most recent data on the median house prices ratios in South Kesteven. If this rate of increase were continue over the new proposed Local Plan period from 2018 to 2041, this could mean that the affordability ratio could reach 11.91 by 2041, if appropriate action is not taken to arrest this rate of increase.
- 2.41 If this trend were to continue, then further increases would need to be planned for to make sure that the figure finally adopted as the new Local Plan target does not become out of date during its production process. The Council should not wait for future adjustments to the standard method to be made part way through the local plan production process as this may cause delays to an already long process. They should seek to 'bake in' an element of expected future uplifts to the local housing need requirement to ensure that the local plan process can proceed smoothly.

- 2.42 This concern about the length of time it takes to prepare and adopt a Local Plan is well founded, as despite the Government's recent announcement to change the planning system so that Local Plans only take 30 months (2.5 years) to prepare, the current (recently adopted in 2020) plan for 2011-2036 took over five years to prepare.
- 2.43 In addition to the above, there is also concern about the past rates of delivery in the District. As the Council admits in its own Local Plan, the rates of delivery in the area between 2011 and 2018 are poor. Subsequently, the Council (according to the latest results) have been failing the Housing Delivery Test by only delivering 82% of the houses required (1,602 compared to 1,947). On that basis, the Council would need to add a 20% buffer to its housing needs when determining if it has a 5 year supply of housing land. This approach should be taken to its currently devised local housing need figure of 754 dpa, which would increase it to 905 dwelling per annum.
- 2.44 Although it may be argued that the local housing need figure takes account of past delivery and thus it 'wipes the slate clean' in terms of previous under-delivery, South Kesteven has for a long time not been meeting its needs, according to its own monitoring data. The latest 5 Year Housing Land Supply Position (2019) shows that on average between the 2011/12 and 2018/19 monitoring years, an average of 531 dwelling per annum were completed. This is against a target of 650 dwelling per annum showing that over the long term they have only been meeting 82% of their (current and lower) target. This suggests a longer term problem of delivery in the area, and thus they should proactively plan for a higher level of housing to enable rates of delivery to be boosted.
- 2.45 Looking specifically at affordable housing, the latest Strategic Housing Market Assessment for the area (2017) sets out a requirement for 238 dwelling per annum of affordable units. This was a decrease of 41 dwelling per annum from the previous assessment undertaken in 2015, and yet for some reason the Council's recently adopted plan refers to the 2014 SHMA which set a target of 343 dwellings. Regardless, the Local Plan sets a target of 30% of on-site units to be provided as affordable, a decrease from the 2010 Core Strategy of 35%. This reduction in target seems odd considering the worsening affordability situation in the District, as well as the Council's reference to an outdated Strategic Housing Market Assessment in its current plan (which highlights a higher need figure than their latest data).

- 2.46 We attempted to find information specifically relating to the delivery of affordable housing, however, there was very little information, with the Council's most up to date Annual Monitoring Report being from 2014. This showed that between 2011/12 and 2013/14 the number of affordable homes delivered was 264 (117, 56 and 91 in each year respectively) compared to a Core Strategy target of 236 dwellings. The delivery of affordable housing is similar to that of market housing, in that it has been disappointing. The lack of recent data, and the information we do have points to a need to uplift housing targets to enable further affordable units to be brought forward. On that basis a significant uplift to enable additional affordable housing should be applied to the housing target in the new Local Plan.
- 2.47 Overall, the Council should seek to go beyond the local housing need set out by national policy and be ambitious about making up for lost time due to its previous poor rates of delivery. On the basis of their past performance and their current status under the Housing Delivery Test, we would suggest an additional 20% uplift to the current target to help ensure there is sufficient growth planned for in future.

#### **Question 7a – Distribution of Growth**

*Do you agree that Grantham should remain as the focus for growth in South Kesteven?*

- 2.48 Yes, it is strongly agreed that Grantham should remain the focus for growth given that it is the District's sub-regional centre and there is access to retail, health, employment, leisure, public transport and infrastructure.
- 2.49 This is essential to ensure that the District contributes towards achieving sustainable development in line with the economic, social and environmental objectives set out in paragraph 8 of the Framework.
- 2.50 However, as outlined in the response to Question 5c, it would be appropriate if some of the growth is delivered as part of a new settlement which is located within a close proximity to Grantham and where sustainable modes of transport between the two can be delivered.
- 2.51 The importance of focusing on Grantham is reflected in the Sustainability Appraisal (2020) whereby either continuing the main focus of the District's growth in Grantham or renewing and increasing the focus scores higher against reducing the focus of growth on Grantham in all sustainability appraisal themes except biodiversity and geodiversity, landscape and historic environment. The implications of a new settlement outside of Grantham and its impact on biodiversity and geodiversity, landscape and historic environment has been addressed in further detail in response to Question 5c.

#### **Question 7e – Consideration of the Market and Deliverability**

*Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?*

- 2.52 Yes it is considered that market capacity is a factor which should be weighed into consideration when determining growth areas. Marketability is however difficult to measure and the main focus should relate to achieving sustainable development in accordance with the economic, social and environmental objectives outlines in paragraph 8 of the Revised Framework (2019).
- 2.53 Deliverability is an essential consideration for the plan-making process. This is emphasised throughout national planning policy and guidance and in particular paragraph 16 of the Revised Framework (2019) states that plans should *'be prepared positively, in a way that is aspirational but deliverable'*. Furthermore, as detailed in paragraph 1.8 of this Representation for a Plan to be considered 'sound' it must be effective which includes ensuring it is deliverable over the plan period.
- 2.54 Importantly, the Sustainability Appraisal (2020) does not raise any concerns regarding the deliverability of a new settlement.
- 2.55 It is strongly contended that if the Council work proactively with landowners and developers, a new sustainable settlement could be delivered within a reasonable timeframe. Footnote 35 of the Revised Framework (2019) states that *'the delivery of large scale developments may need to extend beyond an individual plan period, and the associated infrastructure requirements may not be capable of being identified fully at the outset. Anticipated rates of delivery and infrastructure requirements should, therefore, be kept under review and reflected as policies are updated.'*
- 2.56 The Council needs to be realistic in the delivery assumptions and lead in times associated with strategic scale developments and ensure they are allocating sufficient land. A more detailed response to concerns relating to South Kesteven's previous delivery rates has been included within the response to Question 6.

#### **Question 11a – Energy Performance Standards in Residential Development**

*Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?*

- 2.57 Climate change is a key challenge faced by South Kesteven District Council and is at the centre of Government planning policies and guidance.

- 2.58 The Planning and Energy Act 2008 allows South Kesteven District Council to set energy efficient standards which exceed the current requirement of building regulations up to or the equivalent of Level 4 of the Code for Sustainable Homes in their Local Plan Review. These standards must however accord with the national policies.
- 2.59 Nevertheless, consideration needs to be given to the potential implications of requiring higher energy performance standards. It is understood that energy requirements of Level 4 of the Code for Sustainable Homes is approximately 20% above current Building Regulations across the build mix. This would have significant implications in terms of build cost for all developers which in turn will impact on deliverability and affordability.
- 2.60 In order for the Local Plan to be considered 'sound' at Independent Examination, paragraph 35 of the Revised Framework (2019) requires it to be positively prepared, justified, effective and consistent with national policies. Accordingly, it is imperative that the policies contained within the Local Plan are deliverable over the plan period. By creating too restrictive planning policies which will be costly for developers, it is likely to negatively impact upon deliverability of the Plan. As outlined in paragraph 4.14 of the Issues and Options Report (2020), the housing need figure is *'16.6% higher than the housing need figure in the current adopted Local Plan and represents a rate of housebuilding not experienced in South Kesteven since the recession of 2008.'* It is therefore essential that not only do South Kesteven plan for this growth in an appropriate manor as outlined throughout this representation that all other planning policies contained within the Plan are not too onerous that they would impede on deliverability.
- 2.61 The new Local Plan should therefore not require higher energy performance standards than established by building regulations for residential development.

### **Question 13 – Parking Standards**

*Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.*

- 2.62 It is agreed that minimum parking standards would be beneficial for the District. It is however imperative that such policy is flexibly worded to enable to decision makers to assess the planning application on their own merits as in some instances a lower parking standard may be considered acceptable.

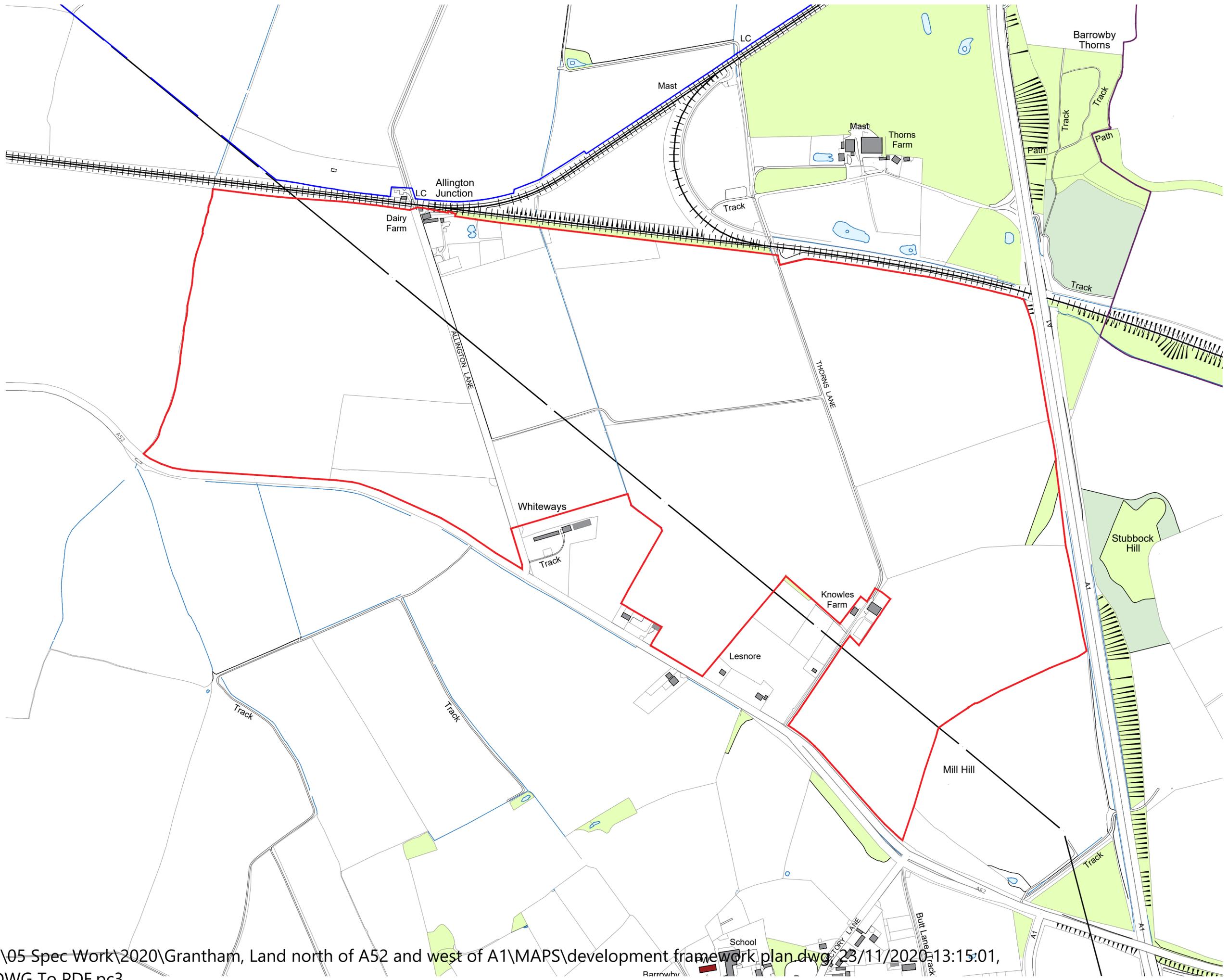
### 3. CONCLUSION

- 3.1 It is agreed that the Local Plan Review should continue to direct growth towards the most sustainable settlement which is Grantham.
- 3.2 The Council have identified that in their view the housing need is 754 dwellings per annum. This is however a minimum number to be planned for and delivered and in this case there is a need for the Council to opt for a higher housing need figure as a result of its previous poor rates of delivery and in order to provide an economic uplift. As a result of the detailed assessment provided in response to Question 6, Boyer concludes that an additional 20% uplift on the current target would ensure there is sufficient growth planned for the future. The housing need is therefore 905 dwellings per annum.
- 3.3 As detailed in paragraph 72 of the Revised Framework (2019), one of the best mechanisms to significantly boost the supply of homes is delivering housing as part of new settlements or significant extensions to existing settlements. The response to Question 5c clearly advocates the benefits of the Council accommodating a substantial proportion of their growth on a sustainable new settlements within a close proximity to Grantham, the District's Sub-Regional Centre.
- 3.4 Our client controls Land North of A52, Grantham which has been assessed under area 5 (northwest of Grantham) of the Grantham Capacity and Limits to Growth Study (July 2015) prepared by AECOM. The assessment concludes that it is a suitable area for residential development subject to some mitigating factors.
- 3.5 This Representation is accompanied by a Call for Sites submission which details the potential of Land North of A52 and is supported by a Vision Document which demonstrates what could be achieved. At this early stage in the process, it is envisaged that the settlement could deliver approximately 2500 dwellings along with a new local centre, school and accessibility to sustainable modes of transport. This proposal could be extended in the future to up to 5000 dwellings utilising adjoining land to the north within the same ownership.
- 3.6 In order to ensure the plan is positively prepared, justified, effective and consistent with national policy, the Council should give due consideration to this representation and associated Call for Sites submission.

## **APPENDIX 1 – SITE LOCATION PLAN**

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Do not scale from this drawing. All contractors must visit the site and be responsible for taking and checking Dimensions.

Key  
- Site boundary



# Boyer

Project  
Grabtham, Land north of A52  
and west of A1

Drawing Title  
Site Location Plan

Drawing No. 102 Job Ref. -

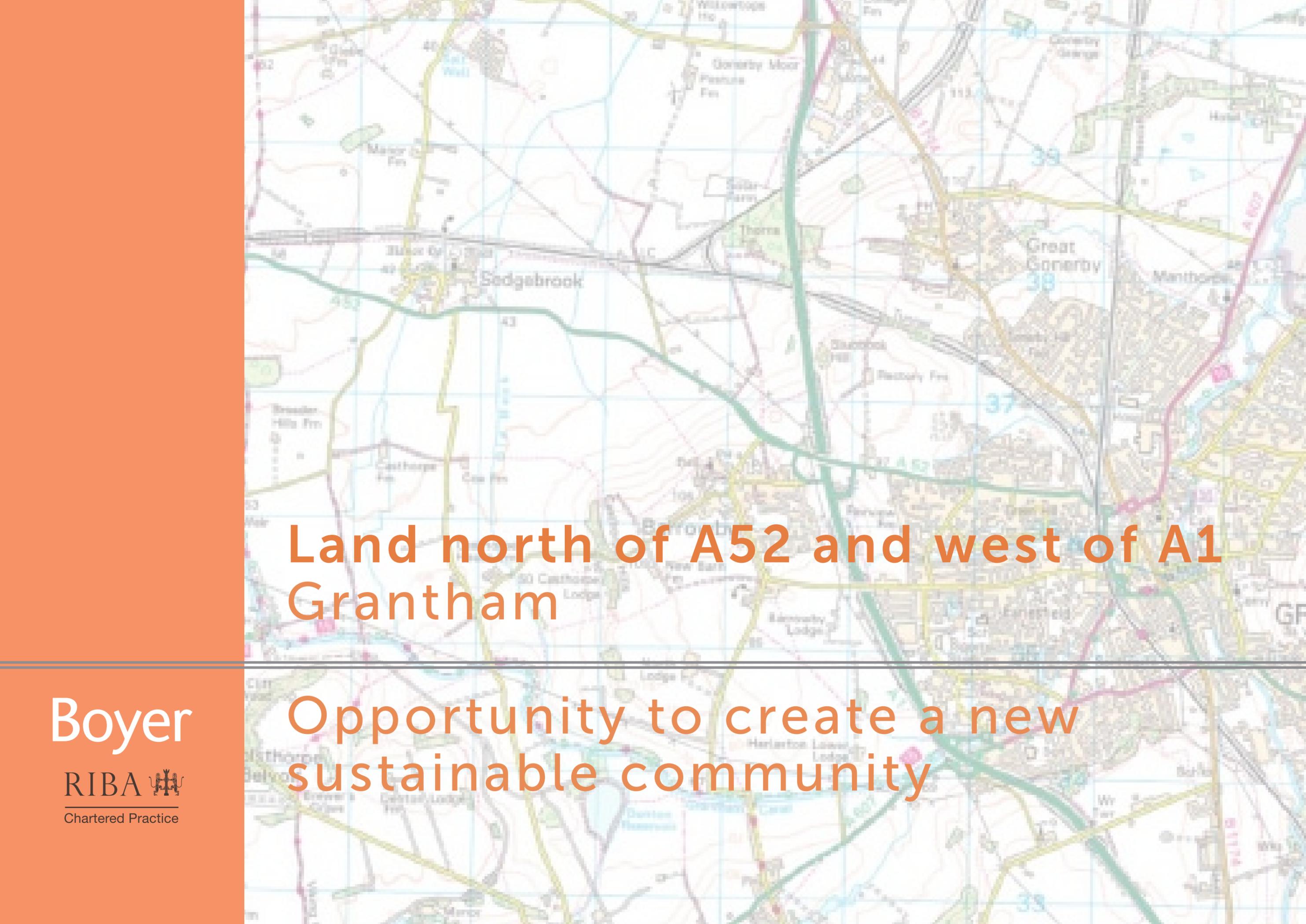
Scale @ A2 1:5000 Revision -

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## **APPENDIX 2 – VISION DOCUMENT**



**Land north of A52 and west of A1  
Grantham**

**Opportunity to create a new  
sustainable community**

**Boyer**

RIBA   
Chartered Practice

# Land north of A52 and west of A1 - Grantham

## Opportunity to create a new sustainable community

### DEVELOPMENT POTENTIAL

The Site is located to the west of Grantham and covers an area of approximately 133ha. It benefits from being well connected by existing highway infrastructure, enclosed by the A1 that links into Newark-on-Trent, and by the A52 that connects into Nottingham and Grantham town centre.

The northern boundary of the Site sits adjacent to the railway line that provides services between Nottingham and Peterborough, and the railway intersection that serves the Nottingham-Skegness route.

Several existing public footpaths traverse the Site and connect with the wider network of footpaths, leading to the nearby villages of Alligton, Sedgebrook, Barrowby, and Great Gonerby.

The Site is near the retail and light industrial area to the northeast of the A1 and close to a potential new employment area also been promoted as part of the call for sites consultation for the South Kesteven Local Plan Review. The potential new employment area sits to the west of the A1, north from the Site, and could directly connect via a pedestrian and cycle link with the proposed new development.

Development on Site has the potential to create a sustainable new community with quality housing and a wide range of community facilities set within an existing well connected network of routes. Besides, the development could bring about the potential for a new train station to serve the new and existing communities and employment areas, thus creating a truly sustainable new settlement that reduces the reliance on the car in favour of more sustainable transport modes.

**In summary, Land north of A52 and west of A1 has great potential to deliver a sustainable new neighbourhood that will bring a wide range of community benefits including:**



A wide range of new homes from starters, family homes and adaptable homes for later living



New schools and employment areas to provide learning and job opportunities



New Community Park, green corridors and woodland areas to enhance biodiversity



Local Centre with community facilities and local shops



A wide range of play facilities for children of all ages and abilities



New green corridors and enhanced links, creating a sustainable and integrated new community



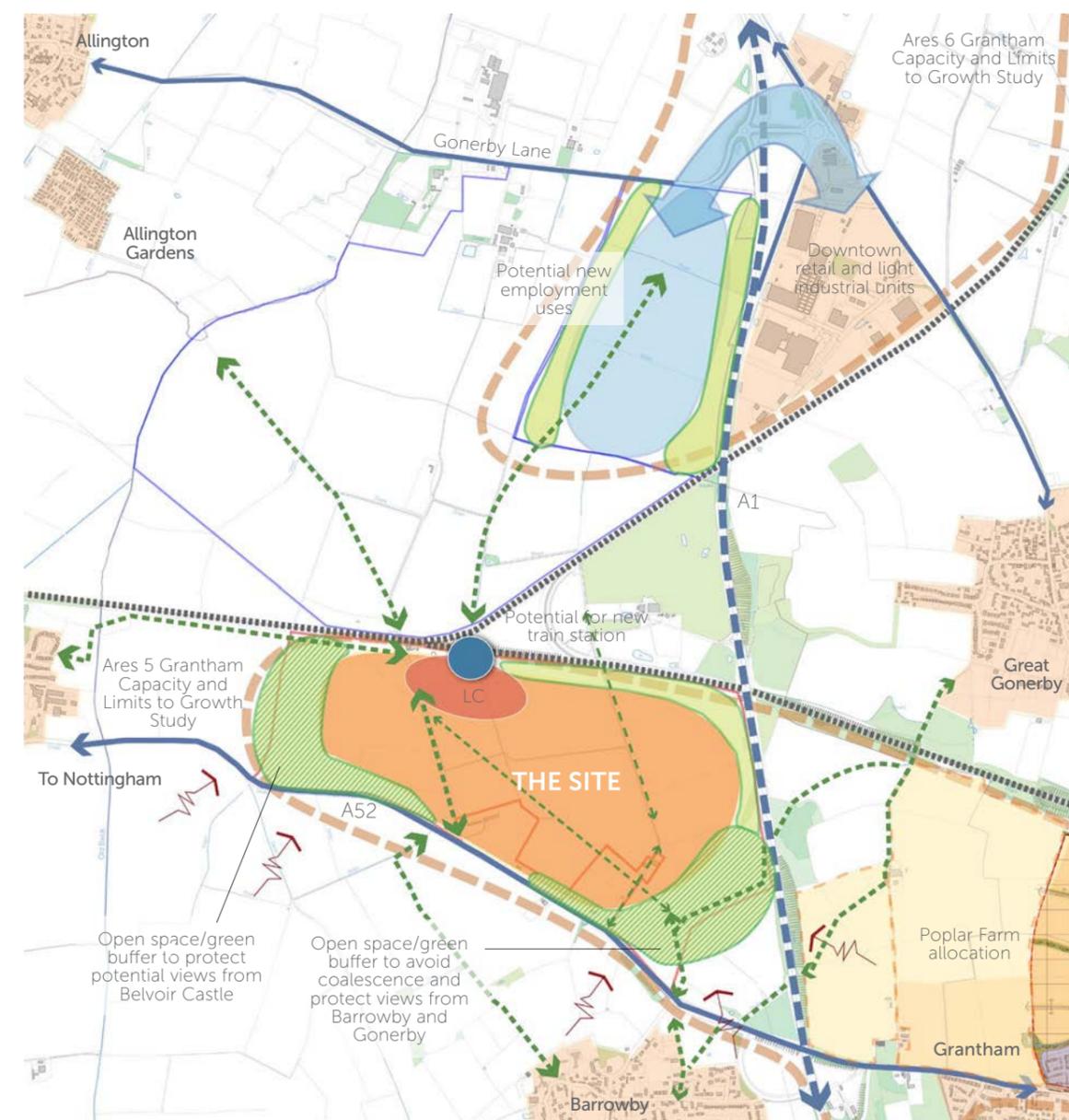
Potential new train station connecting with Nottingham and Grantham



A well connected network of open spaces and leisure areas to encourage healthy living

The Site's potential for development was identified by the Grantham Capacity and Limits to Growth Study by South Kesteven District Council under Area 5 to the west of the A1. The study assessed the suitability of land for development to inform planning in South Kesteven and set considerations for the next stages of the plan-making process including:

- The desirability for new villages
- The potential benefits of clustering development - "a site will become more suitable if there is a "critical mass" to support the range of infrastructure required to ensure sustainability"
- Balancing new housing with new jobs to encourage sustainable economic growth
- The need for close coordination with infrastructure providers



Wider context plan

Not to scale - November 2020

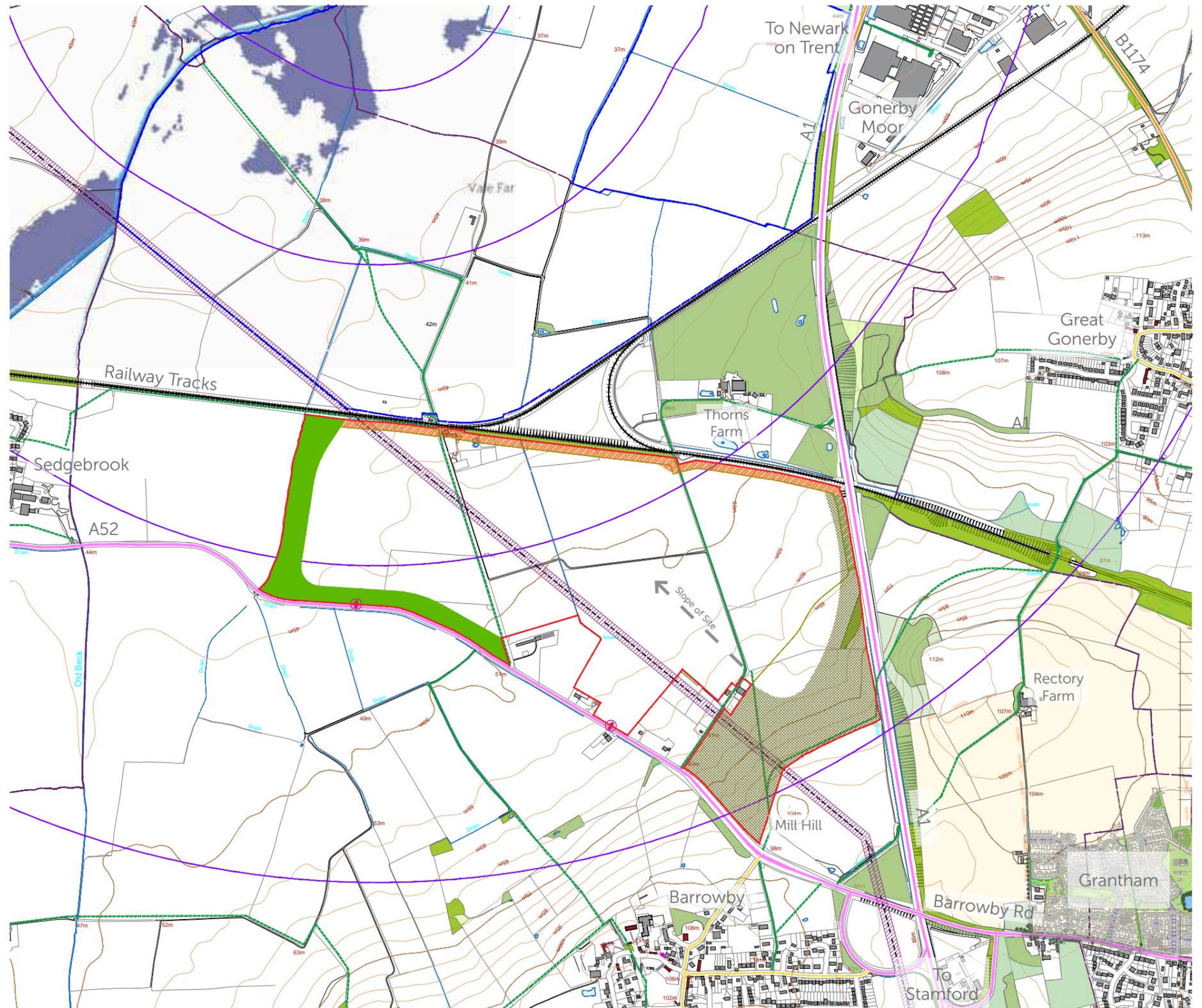


### UNDERSTANDING THE SITE

#### Constraints and opportunities plan

Key (for plan to the right)

- Site boundary
- Primary Road
- Secondary Road
- Local Roads
- PRoW
- Railway tracks
- Contours
- High voltage line with 15m buffer on either side
- Listed Building
- Allington meadow SSSI buffer
- Existing vegetation
- Flood zone 2 and 3
- Potential access to site
- Noise buffer
- Green buffer from adjacent countryside open space
- Green buffer to nearby built settlements and steep contours



# Land north of A52 and west of A1 - Grantham

## Opportunity to create a new sustainable community

### TRANSPORT ACCESSIBILITY

In addition to the existing highway infrastructure enclosing the Site; the A52 and A1, the Site provides a great opportunity for a new "Parkway" railway station.

The Site provides the potential of clustering development, new community infrastructure, and employment, critical to ensure sustainability and further support a new railway station.

A railway station on site will also:

- Provide parking facilities/P&R to relieve traffic pressure from the centre of Grantham
- Maximise usage of the East Midlands Railway newly increased services on the Nottingham to Skegness via Grantham line, and encourage commuters using the A52 to enter the town or access the East Coast Mainline by train
- Reduced congestion and improved air quality in the town centre
- Reduce northern traffic entering Grantham through Great Gonerby to access the town centre and railway station, as traffic could park at the new station (accessed via a new link road from the north), and enter the town either by train or bus



# Land north of A52 and west of A1 - Grantham

## Opportunity to create a new sustainable community

### CONCEPT FRAMEWORK

The new development will:

- Bring about the opportunity for a new train station to serve existing and new local communities
- Create a wide range of new homes including affordable homes in a highly sustainable location
- Provide a wide range of community facilities including schools and a local centre with employment uses, community facilities and retail.
- Be sensitively designed to avoid coalescence and protect views from Barrowby and Great Gonerby
- Provide a network of routes and open spaces created around existing routes connecting the development with the wider local context.
- The Concept masterplan accommodates approximately 2,500 new homes.

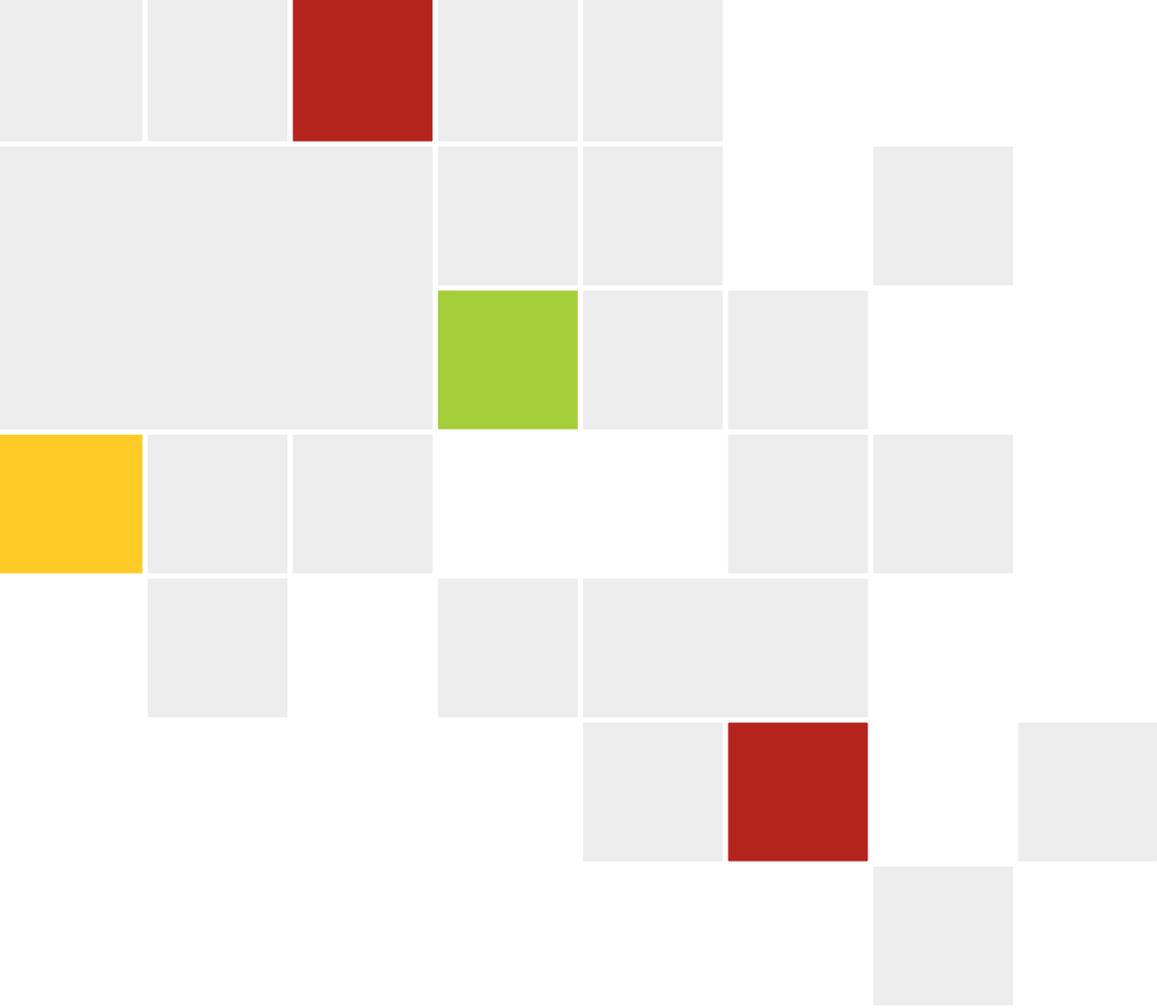
#### KEY

- 1 Potential main access points to the development
- 2 New green corridor created along utility easement area
- 3 Pocket parks within the development
- 4 New Community Park
- 5 Local Centre with mixed uses and community facilities
- 6 Primary and Secondary schools
- 7 Potential new Parkway Train Station
- 8 New open space as interface with the countryside
- 9 Landscape/noise buffers to the edge of the development
- 10 Public Rights of Way retained and enhanced
- 11 Residential areas

### Concept framework plan



Boyer



Boyer



For Official Use Only:

REF: SK.IAO.0075

CN:

ADD:



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DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name		Steve
Last Name		Harley
Organisation	Milton (Peterborough) Estates Company ('Milton')	Oxalis Planning Ltd
Address	c/o Agent	██████████ ██████████ ██████████ ██████████
Postcode		██████████
Telephone		██████████
Email Address	██████████	██████████

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	23/11/20

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	X
If not please provide details.					
Please see attached – it may be too early to confirm that all elements of the vision remain valid and unchanged.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	X
If not please provide details.					
Please see attached. Parts of the vision may need to be amended and updated if the spatial distribution and approach to future growth is changed.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	X
If not please provide details.					
Overall the objectives are sufficiently strategic and non-specific that many seem unlikely to required change even if the spatial strategy and housing delivery requirements change significantly. However, it is too early to be able to confirm this.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	X	Unsure	
If not please provide details.					
Please see attached.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	X	No		Unsure	
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If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	X	Unsure	
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If not, please provide details of what changes you think should be made.

Please see attached.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	X
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If not, please provide details of what changes you think should be made.

The link provided in the I&O document does not relate to Larger Villages?

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	X	No		Unsure	
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If so, please outline any suitable and deliverable proposals.

Please see attached. This should be considered in the wider sub-regional housing market area context, not in isolation.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	X
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**If not, what evidence do you have to justify an alternative need and requirement?**

Please see attached. It is too early to confirm the OAN figure.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	X
-----	--	----	--	--------	---

**If not, please provide details and any alternative proposals.**

In the context of increased housing need, 'more of the same' may not be the most appropriate strategy. Please see attached.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	X
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**If not, please provide details and any alternative proposals.**

In the context of increased housing need, 'more of the same' may not be the most appropriate strategy. Please see attached.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	X
-----	--	----	--	--------	---

**If not, please provide details and any alternative proposals.**

In the context of increased housing need, 'more of the same' may not be the most appropriate strategy. Please see attached.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	x
-----	--	----	--	--------	---

If not, please provide details and any alternative proposals.

In the context of increased housing need, 'more of the same' may not be the most appropriate strategy. Please see attached.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	X
-----	--	----	--	--------	---

Please provide details

Please see attached.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	X
-----	--	----	--	--------	---

If not, please provide details.

Please see attached.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	X	No		Unsure	
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If not, please provide details.

A fresh approach may be required to diversify the supply and location of 'employment sites' if trends seen during the Covid pandemic are adopted on a more permanent basis. Please see attached.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	X	No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
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Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

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**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

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**18. Any other Comments**

**Q14 – Any other Comments**

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**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

Please see attached.

**Thank you for responding to this consultation.**



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**Consultation Response  
to the  
South Kesteven District Local Plan Review  
Issues & Options Document**

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Representations on behalf of  
Milton (Peterborough) Estates Company

November 2020

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## 1.0 Introduction

- 1.1 These representations are submitted by Oxalis Planning on behalf of Milton (Peterborough) Estates Company ('Milton'). Milton is a landowner with interests across and beyond Cambridgeshire including in the Peterborough housing market area, and have an interest on land adjacent to Market Deeping.
- 1.2 At this stage in the plan review process, and in response to the strategic questions and issues raised by the Issues and Options Consultation Document (referred to as 'the I&O document'), this response is deliberately strategic and non-site specific in nature. However, Milton is keen to engage in further detail with SKDC and other partners regarding the most appropriate responses to a number of the strategic issues rightly raised in the I&O document.
- 1.3 The context for the Local Plan review is clear as set out in paragraph 1.6 of the I&O document – the review is required following the recommendation of the Inspector at the most recent Local Plan Examination and reflects the fact that the adopted plan was examined against a now out of date national policy context. The current context regarding ongoing change to national policy is also relevant and potentially significant, with a national review of the Planning system underway, including likely further changes to the way in which housing needs are to be assessed and planned for.
- 1.4 This is especially pertinent given that part of the scope of the review is on housing need as stated in the I&O document:
- “1.8 An early plan review also enables the Council to consider whether its local housing need has changed significantly so as to warrant a re-evaluation of the strategic policies for housing.”*
- 1.5 In this current context, and with some significant 'moving parts' and uncertainties as regarding national policy and the calculation of housing need, we believe it essential and appropriate that this early stage of the SKDC review explicitly considers the need to include a number of fundamental issues and questions within the scope of the next Local Plan review.
- 1.6 With the intended submission date for a revised plan for Examination given as December 2023, it is assumed that there will be sufficient clarity by the later stages of the plan preparation process in order to ensure that the Submission Draft Plan will be 'sound' and appropriate as regards new or amended national planning policy and/or associated technical guidance.

## 2.0 Responses to key questions raised by the Issues & Options Document

- 2.1 As indicated on the enclosed response form, Milton wishes to respond to a number of the consultation questions posed by the I&O document. These responses are set out below with reference to the relevant questions.

### Question 1a and 1b – The Vision

- 2.2 The adopted vision, in general terms, remains broadly appropriate in many respects and seems unlikely to require radical change. However, given that the vision is in many ways an expression of the overall spatial strategy for the District, some parts of the vision may need to be revisited and revised depending on the ultimate outcomes and content from the Plan review process.

- 
- 2.3 For example, if the strategy for meeting revised (increased) housing figures changes to include one or more new villages, then this may need to be reflected in, or incorporated into, an amended vision to the District over the period to 2041.

#### Question 2 – Objectives

- 2.4 Overall the objectives are sufficiently strategic and non-specific that many seem unlikely to require change even if the spatial strategy and housing delivery requirements change significantly. However, it is too early to be able to confirm this.
- 2.5 The numerous references to employment land and premises as part of the Plan's role in supporting sustainable economic development and growth, and the overall approach to what this means in practice, could be revisited as part of the review process. The experience and lessons learned from the Covid-19 pandemic includes a potentially changed perspective on what infrastructure and/or workplaces are required to enable and encourage a meaningful proportion of economic activity. For example, there may be a demand and need for a higher proportion of smaller business hubs or business centres, and less demand for employment floorspace focused in the main existing employment sites or town centres.
- 2.6 Districts such as South Kesteven may be well placed to seek to disperse 'employment' development across a wider range of settlements and locations, as well as ensuring delivery of housing and telecommunications infrastructure which enables 'work' from a range of locations. This could see more but smaller employment sites in and around existing settlements rather than concentrations in the largest settlements only. Consideration of the market need and demand for flexible and mixed-use employment spaces might feature as part of this forward looking response.
- 2.7 This is also relevant to Questions under Proposal 9 re: Employment Policy.

#### Question 3 – Policies not proposed to be changed significantly

- 2.8 Given the early stage of the review process, and some of the uncertainties it faces, it is questionable whether it is practical or realistic to provide such a list of policies considered unlikely to change at this point. Doing so might be perceived as pre-determining some of the outcomes from the Issues and Options consultation process.
- 2.9 To the extent that some of the policies listed as '*not proposed to be changed significantly*' relate directly to the allocation of housing growth, the list is surprising. The main example of a listed policy which may need to change if the allocation and/or distribution of housing changes is **H1 Housing allocations**. It is evident that if (when) new sites are added, that policy will need to be amended, potentially significantly and so it should be removed from the list.
- 2.10 Similarly, an alternative spatial strategy to accommodate growth may have implications for a number of other policies, including **SP4 Development on the edge of settlements** and this policy should also be removed from the list. Leaving aside the difficulties in interpreting or defining what it means or how it is measured in practice, it seems highly questionable whether the current policy's criteria regarding 'a degree of local community support' will be sustainable in the context of a number of (difficult) strategic and long-term decisions about the delivery of growth and development.
- 2.11 If the list is retained, it is entirely appropriate and supported that policies such as *SP1 Spatial Strategy*, and *SP2 Settlement Hierarchy*, are not listed because they may well require significant change.

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#### Question 4 – Plan Period

- 2.12 It is appropriate for the plan period to be rolled forward to extend to 2041. It is understood that the adoption date is assumed to be 2024, but it is less clear when the start of the plan period might be – it appears likely to be 2018-2041 but this could be clarified for the avoidance of doubt.

#### Question 5 – Settlement Hierarchy, and new settlement

- 2.13 The context for this review of the Plan, as set out above, and in the I&O document itself, strongly suggests that ‘more of the same’ with regards to the spatial strategy, including the settlement hierarchy will not be appropriate, and/or may not be deliverable.
- 2.14 With potentially significant increases in the housing need to be planned for and delivered across the District, and in the wider housing market, SKDC is right to ask this question at this stage. It is entirely possible that one or more appropriately located new villages are required as part of the response to meeting the higher housing need figures in a sustainable way. This could form part of the strategy for accommodating housing needs over the plan period if the Sustainability Appraisal and other evidence suggests that the final, increased housing numbers are sufficiently high as to create concerns regarding the environmental and/or social impacts, and that such growth might be undeliverable, based on the current spatial strategy and settlement hierarchy.
- 2.15 It is noted that Policy SP1 includes a reference to housing needs being informed by the evidence base gathered across the Peterborough Sub-Regional Housing Market Assessment, and ‘*strong links to the growing economy of Peterborough*’ form part of the established and adopted ‘vision’ for the District. In revisiting housing need and distribution, the potential role of a new settlement in meeting housing needs should be explicitly considered. This should include active consideration of the need for a new settlement which could meet not only housing needs generated within South Kesteven, but also housing needs in the wider Housing Market Area. Given the clear functional economic relationships across the administrative boundary with nearby Peterborough City, including an established housing market area which spans the administrative boundary, the review should actively consider the potential for new villages which can meet wider housing needs.
- 2.16 As the housing needs of SKDC become clearer, the needs of the wider housing market area will also become clearer, and new settlements should be considered as part of a holistic review of how to best respond across the housing market area. SKDC should not undertake the Local Plan review in isolation of the wider housing market and opportunities to work across the administrative boundary.

#### Question 6 – Housing Need and Requirement

- 2.17 The I&O document asks whether it would be appropriate to base the new local plan on a housing requirement of 754 per annum, increased from the current requirement of 650 per annum. It appears too early to know (or confirm) that the 754 figure is appropriate, and this cannot be fixed or defined now.
- 2.18 The 754 figure is based on the current national method for calculating need, but the proposed (emerging) new national method would suggest that a higher figure may be required. For

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example, national work undertaken and published by Nathaniel Lichfield & Partners<sup>1</sup> suggest this may result in an annual need figure of around 839 dwellings in SKDC. Neighbouring Peterborough City in the same Sub-Regional Housing Market area could see an even more significant increase over existing Local Plan requirements based on the same work by Lichfields. This sub-regional context could be an important consideration and driver of the spatial strategy for the Local Plan review, and for the next Local Plan review in Peterborough.

- 2.19 Even with ongoing debate and technical work at the national level about the most appropriate method or algorithm to inform housing need calculations and distribution across the country, the UK Government appears to remain focused on delivering a target of 300,000 homes per year. Such a national target seems likely to have potentially significant implications, especially for areas outside of Green Belts and without other significant environmental constraints or designations.
- 2.20 Therefore, it appears far too early to confirm that the 754 annual figure is appropriate. It would be sensible for the plan review process to proceed based on a range of levels of potential housing need. It would seem appropriate and pragmatic to assume that 754 per annum is at the lower end of the range tested and assessed, but a range should be considered given the clear 'direction of travel' at the national level.

#### Proposal 7, and Question(s) 7 – Distribution of Growth

- 2.21 South Kesteven's adopted Local Plan sets out the following targets
- 50% of new housing development (approx. 7,813 new homes) in or around Grantham;
  - 20% (approx. 3,125 new homes) in Stamford
  - 7.6% and 7.8% of new housing in The Deepings and Bourne respectively (approx. 1,220 homes in each town)
  - 9.7% (approx. 1,516 new homes) in the larger villages across South Kesteven.
- 2.22 To meet the projected continued growth in housing need, more sites for housing will need to be found. This next Local Plan review will again need to consider the most appropriate locations for development. This will need to begin with an understanding of the main constraints on development such as flood risk, transport connectivity and accessibility, as well as a desire or preference to preserve the best quality agricultural land, and to provide space for nature recovery and climate change mitigation.
- 2.23 Based on previous Local Plan reviews, the planning strategy options are likely to include some or all of the following:
- Increased urban densities, particularly in Grantham and other urban areas;
  - Further extensions around the edges of Grantham as the main urban settlement in the District, and possibly extensions to other larger settlements which contain or can deliver appropriate supporting infrastructure;
  - Further incremental growth in the smaller villages.
- 2.24 All of these options create opportunities to deliver development, but also often arouse strong feelings. In particular, further incremental growth in villages is often deeply unpopular with local residents as the relatively small scale of each development often means new homes are built with limited contribution to new infrastructure or services. Many existing communities will now feel that they have 'done their bit' and exhausted any sustainable, suitable options which can be developed without dramatically altering the character and scale of those villages. This is in part

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<sup>1</sup> <https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/>

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evidenced by the majority of Neighbourhood Plans either in place or under development envisage no further expansion of village envelopes, and many specifically argue against further housing growth.

- 2.25 In this context, as referred to under in response to other questions in the I&O document (including Question 5c above), we believe it is right that new villages are now actively considered.
- 2.26 We also believe it essential, and appropriate, to consider whether there are sites adjacent to key settlements, including sites outside of the administrative boundary of SKDC, which could address local housing market needs in a sustainable way. Given the shared housing market area which includes parts of SKDC and Peterborough, we believe this too should be considered as part of the review.
- 2.27 Milton is keen to discuss the potential role of such a cross-boundary site which could meet local housing needs in both Peterborough and Market Deeping.
- 2.28 With regard to market capacity and deliverability (question 7e), Government review and reforms include a drive to increase the scope and breadth of 'the market' in terms of housing delivery. Any approach which seeks to determine or consider market capacity should be in the context of a push to see more delivery in more places than seen to date. In the context of a long-term, strategic Local Plan to 2041, a range of sites and locations will be required, not only those available and deliverable 'now', so the definition of 'deliverability' needs to be carefully considered and applied.

#### Proposal 9 and Question 9a and 9b – Strategic Employment Allocations

- 2.29 See the response to Question 2 re: Objectives.
- 2.30 Employment land policies should be revisited in the context of current market demand and need for many forms of traditional office accommodation, and the opportunities for more diversity in the supply and location of employment spaces and accommodation. The plan should consider issues such as:
- what are the longer-term and land-use implications if there is a more permanent move towards more flexible working patterns with less emphasis on centralised office or other traditional work spaces in town centres?*
- 2.31 In this context, a network of generally smaller employment sites which could accommodate smaller-scale business parks or shared workspace buildings might be required in the future rather than more 'strategic employment sites'? If located on key transport routes and services, and close to or within existing or new communities, this additional component to employment land supply could help support flexible and more dispersed patterns of remote working if this is a trend which is to be sustained and/or encouraged.

#### Question 10 – Climate Change

- 2.32 It is clearly appropriate to consider climate change as part of the Local Plan review, and any additional content or policies should ensure minimal overlap or duplication with national building regulations or other relevant regulation which would apply to new development in any event.
- 2.33 An interesting and relevant question which might feature as part of the Local Plan's consideration of the issue and the wider associated issues associated with delivering sustainable development, is the extent to which new villages offer an opportunity to deliver energy efficient, climate change

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resilient and sustainable new communities in South Kesteven. A key focus might be on whether they can deliver new growth in a manner which has advantages, or fewer disbenefits, than alternative strategies for delivering additional housing growth in the context of a largely rural District.

### **Interim Sustainability Appraisal (SA) Report**

- 2.34 The Interim SA Report is understandably a high-level document, providing brief and strategic commentary. It serves to underline both the complexity of the various tensions between competing objectives and issues, as well as the necessity of more detailed and specific consideration of locations or sites in order to progress the evolution of strategy and policy. At the high-level at which the interim SA sits, it's clear that there are some environmental challenges associated with planning for more development in general, and there are social and economic advantages to locating development close to where there are already facilities, infrastructure and existing communities. The relative ranking (on the chosen 1 – 3 scale), albeit only used to reach brief conclusions, will be directly informed by some inherent and implicit assumptions, and about a limited understanding of some options. With an alternative set of assumptions made about certain strategic options the ranking given could be very different – particularly for new options which are currently not closely aligned to the adopted strategy. For example, depending on the location and nature of a new 'garden village', this option could deliver a range of environmental, social, and economic benefits which exceed those which might be delivered by continued incremental growth via urban extensions, or spreading development across numerous smaller or larger villages.
- 2.35 At this stage it would have been expected to see more indications of uncertainties or a lack of information which means it's difficult (or not possible) to rank or assess and compare the relative effects or impacts of different options. The Interim SA as drafted implies some certainty about a number of potential options which arguably does not yet exist.
- 2.36 The SA should become a more useful tool as more work is undertaken about strategic options, and in the absence of more specific and detailed consideration of competing options at this stage, limited weight should be given to the indications of what might be more or less 'favourable' against the various impacts and criteria used.

## **3.0 Concluding comments**

- 3.1 The above responses to selected questions posed in the Issues and Options Document is intended to aid this early stage in the Local Plan review, and Milton hope and intend to play an active part in the ongoing process.
- 3.2 Milton are keen to engage and discuss all or any of the issues raised with SKDC.

For Official Use Only:

REF: SK.IAO.0076

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name	I P, D and P G	Martin
Last Name	Bailey	Herbert
Organisation	n/a	Brown & Co – Property and Business Consultants LLP
Address	████████████████████	██████████ ██████████ ██████████ ██████████
Postcode		██████████
Telephone		██████████
Email Address		████████████████████

*Please note: that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████████████████	23 <sup>rd</sup> November 2020

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**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

If not please provide details.

Whilst it is accepted that there should be a general predominance towards housing growth being in the major towns, there needs to be more variety and opportunities for village development. There needs to be a shift in the balance towards providing other housing sites. It is not everybody's desire to live in large housing estates in town and this view has been reinforced by recent market activity and controls and constraints that have been introduced as a result of the pandemic. There are more people working from home who would wish to have available open countryside in closer proximity for recreational and general leisure pursuits and there will be less demand on infrastructure in the future as more people work from home. The demographics and spatial distribution policies need to reflect that. The rate of delivery from the large housing sites has not met with expectation and more flexibility in the system generally needs to be introduced. In the NPPF para 8 the social objective needs should be reviewed when assessing the presumption in favour of sustainable development and in particular para 11. The Plan aspirational (para 16). The need to boost the supply of homes (and the figures should be a minimum) is important as it is, consistent with para 59 of the NPPF, making sure that a sufficient amount and VARIETY of land can come forward.

A wider variety of sites particularly in rural areas will encourage healthier lifestyles as expected under para 91 of the NPPF. There is on rural sites a greater opportunity to provide multiple benefits (para 118 NPPF).

It is accepted that there needs to be a revised Plan Period and housing growth level.

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	✓
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If not please provide details.

Reflection needs to be taken of the matters mentioned in Q1a above.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes		No	✓	Unsure	
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If not please provide details.

Generally the objectives are reasonable, but there needs to be, as alluded to previously, a slight shift in the balance of objectives towards housing variety and locations to reflect demographic and other social changes which are happening and which have been accelerated as a result of issues arising from the pandemic. There is within South Kesteven District Council a lower proportion of housing available in village-type sites which are keenly sought after and very few available because of the constraints that have been applied in the past. With greater opportunities and an understanding of changes in social habits, this will support the view that there should be more village-type development to cater for this particular need. Policies SP2, 3 and 4 are very restrictive compared to other Plans.

### 7. Proposal 3 – Policies not proposed to be changed significantly

#### Q3 – Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No	✓	Unsure	
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If not please provide details.

To accommodate comments previously made and further in this paper, there needs to be a general review of the spatial and housing policies to create additional opportunities and variety in the spatial distribution and housing opportunities within the District.

### 8. Proposal 4 – Plan Period

#### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

### 9. Proposal 5 – Settlement Hierarchy

#### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	✓	Unsure	
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If not, please provide details of what changes you think should be made.

Dependent in changes that are made to the housing distribution, we contend that there are some villages which should move away from the smaller village category and receive greater support for housing growth. Generally the principle of key larger service centres is accepted, but in terms of small villages, there should be, we feel, consistent with the Central Lincolnshire Plan, a further interim category. In the Central Lincolnshire Plan after the main towns there are three village categories. There are the larger villages, medium villages and small villages. Beyond that generally villages are classified as either hamlets or countryside where generally it is accepted, because of the size of the villages, stricter controls are necessary. The greater

proportion of the development should be allocated to the large and medium villages with small-scale opportunities less constrained in the small villages.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No	✓	Unsure	
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If not, please provide details of what changes you think should be made.

Because of the pandemic and generally the need to provide suitable alternative locations, a methodology review would be appropriate to make sure there is a better distribution of housing opportunities to accommodate need.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

If so, please outline any suitable and deliverable proposals.

There is plenty of opportunities within the towns and villages to avoid the need for a new Greenfield settlement site.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	✓
-----	--	----	--	--------	---

If not, what evidence do you have to justify an alternative need and requirement?

The answer to this is probably yes, but this needs to be regularly reviewed with emerging data as the Plan review progresses.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

Subject to there being flexibility in other locations as referred to previously.

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

**If not, please provide details and any alternative proposals.**

**Subject to there being flexibility in other locations as referred to previously.**

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

**If not, please provide details and any alternative proposals.**

**Subject to there being greater opportunity in other villages as indicated below.**

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes		No	✓	Unsure	
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**If not, please provide details and any alternative proposals.**

**Fundamentally this Policy needs to be changed to be more enabling in other village location sites in the categories indicated before, i.e. large, medium and, to an extent, smaller villages. We contend that there needs to be more flexibility for the reasons previously mentioned and that the Plan should be more accommodating in line with other Local Plans and in particular the Central Lincolnshire Local Plan which does encourage growth in all villages albeit those without any services should be more constrained. We feel that Allington should be upgraded in its status and certainly fits within the larger village category depending on the methodology to be applied in future and/or a medium village where there should be opportunities for sites to come forward. In line with the Central Lincolnshire Plan, if it was classified as a medium village then there should be a percentage growth level applied which would create greater flexibility uncertainty. Unfortunately, very few Neighbourhood Plans have come forward because of the cost and time that is needed to produce such a Plan. There is, unfortunately, a general reservation by many communities to any form of expansion, but there needs to be to produce good housing opportunities across the District and to give a greater choice to households in view of changing economic and social habits. The proposals in the Central Lincolnshire Plan are, we feel, helpful and give a much clearer guidance as to what growth would be permissible and this is a Policy that should, we feel, be replicated in the South Kesteven Local Plan. Growth in all of the key villages should be encouraged and the figure in the table on page 16 covering other settlements should be increased above the 600 proposed.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes	✓	No		Unsure	
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**Please provide details**

**There needs to be a thorough analysis of delivery and need and the methodology that applies to allocations for the reasons previously explained.**

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	✓	No		Unsure	
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
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#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
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Please give details.

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#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

--

Yes		No		Unsure	
<b>Please give details</b>					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes		No		Unsure	
<b>Please give details</b>					

<b>18. Any other Comments</b>					
<b>Q14 – Any other Comments</b>					
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?					

**Part C: Sustainability Appraisal Scoping Report**

<b>19. Comments about the Sustainability Appraisal Scoping Report</b>					

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0077

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	Nikki	
Last Name	Gascoigne	
Organisation	Ropsley and District Parish Council	
Address	██████████ ██████████ ██████████	
Postcode	██████	
Telephone	██████████	
Email Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

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<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	23.11.2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes

No

Unsure

If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes

No

Unsure

If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes

No

Unsure

If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes

No

Unsure

If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic”).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	X	No		Unsure	
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If yes, please provide details.

The local plan fails to address the needs of the Gypsy and Traveller community (GTAA) as follows.

- The LP identifies that 32 GTAA pitches are required but this was completed and adopted by the Council without any consultation with the local residents.
- No sites have been identified for GTAA within the existing development sites for 19,000 new homes.
- Concern about the pressure for sites that are not properly considered or suitable because of these first two points. *“The local plan does not identify any sites, suitable or otherwise. This in turn fails to provide suitable guidance for residents, developers and planning officers alike. The necessity to meet the needs of the GTAA seems to override the local plan and its criteria in respect of Gypsy and Travellers. It is evident that planning applications and developers are driving the planning policy here and that the council has no control, and moreover, the District Councillors cannot demonstrate their responsibility and accountability.”*
- The potential GTAA Cold Harbour site (currently under appeal) is highly unsuitable given the small tight size of the plot, its location on the junction of two very busy roads and

potentially dangerous roads, that it is situated away from local facilities, public transport links are difficult.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

### 14. Proposal 10 – Climate Change

#### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

**Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Please give details.**

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**Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

**Please give details**

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

**Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**Please give details**

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

**Yes**

**No**

**Unsure**

**Please give details**

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

## South Kesteven District Council Local Plan Review Regulation 18 Issues and Options Consultation Response Form Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020

### This form has three parts

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

### How to respond:

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Bernard	
Last Name	Champness	
Organisation	Thurlby Parish Council	
Address	██████████ ██████████ ██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
Email Address	████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

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**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████████████████	23 <sup>rd</sup> November 2020

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

**Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?**

Yes		No	✓	Unsure	
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**If not please provide details.**

**This is the opportunity for the Vision to be more detailed and imaginative for the four major towns and address how existing planned development in the Local Plan will impact on the town centres and how these will be addressed to find the solutions for the town centres to thrive, attract business and be popular places to work, live, visit and invest in.**

**Grantham**

*Grantham’s role as the Sub-Regional Centre will be strengthened through significant housing and employment growth”.*

**How will the new major Sustainable Urban Extension to the south of the town at Spitalgate Heath be designed to be a sustainable community?**

**How will the further significant residential development to the north and north-west of the town be designed to be a sustainable community?**

*“Pedestrians and other non-car users can move around safely and comfortably and there will be improved walking and cycling links from surrounding residential areas”.*

**How far does the plan expect people to walk or cycle from surrounding residential areas?**

**Where is the vision to reduce car journeys for work and leisure?**

**Where is a plan to have a Park and Ride for Grantham?**

**Stamford**

**How will “a sustainable urban extension to the north of Stamford providing a vibrant, well designed, appropriately structured development that addresses local housing need and provides tangible benefits for both new and existing residents” become a sustainable community?**

**Does this rely on the proximity to Stamford for services?**

*“The development will foster high quality public realm, built form and landscaping, whilst enabling the essential character of the historic town to be preserved.”*

**What plans are there for local shops and amenities to reduce car journeys?**

**Current road links from the north of Stamford to the town centre are inadequate for this development. What measures are being implemented to provide transport which reduces the need to use a car.**

**Supermarket sites are all to the east of the town centre. Sainsbury and Lidl on the A6121 to Bourne and Morrison’s and Aldi on the A1175 towards Market Deeping.**

**What thought has been given to those to the west of the town and in rural areas to the west surrounding Stamford to access supermarkets?**

**There is no route from the west of Stamford to the east without going through the town centre or congested narrow roads with awkward road junctions at the A43 with Wharf Road, Wharf Road and St Leonards Street, and East Street and St. Pauls with the A1175 and A6121.**

**What are future proposals for road improvements?**

**Bourne**

Bourne is an example of demise in a Town Centre economy.

Tesco, Sainsbury and LIDL continue to flourish. Marks and Spencer and Heron offer a diversity of food offer for those parking centrally at the Burghley Centre, but the town centre has become rundown in appearance and new start up businesses have difficulty of establishing a regular trade which is evident by the rapid change in business premise use of a number of shop units. The Vision needs updating with an expansive plan of regeneration.

Where is the statistical evidence which supports expansion of development in Bourne on which the Local Plan vision is founded?

No mention of growth responding to market trends.

Further expansion houses people further from the town centre.

What measures are being considered to reduce car journeys?

How do people travel into Bourne town centre from Bourne suburbs and outlier villages? Is this by car, public transport, Call Connect or other means?

Results from the forthcoming 2021 Census will likely be too late for the timeline of the review.

The 2011 census is unlikely to give a reliable picture taking in to account the expansion in Bourne, particularly at Elsea Park since 2011.

A snapshot survey of Elsea Park in 2018, revealed that 70% of respondents travelled towards Peterborough for work, and 20% to Stamford.

How is the prospect of increased working from home, increase in online shopping, and an increase in the variety of leisure activities and pursuits, notably cycling and walking, being addressed?

What can be done for the local visitor and tourist economy in Bourne? Has consideration been made of a Tourist Office in the SKDC Community Centre and how this could be manned?

Where is the vision for creating a pedestrian zone at North Street from the A15 crossroads with the A151 to the roundabout with St Gilbert’s Road, limiting access to essential services and deliveries?

**Villages and Countryside**

Please add ‘identity’.

*All villages will retain their identity, diversity and vitality, .....*

**Q1b – The Vision**

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?**

Yes		No	✓	Unsure	
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**If not please provide details.**

This is the opportunity to address the modes of transport for access to shopping centres and the workplace. The Local Plan acknowledges the issue, but fails to address the solution, concentrating on expansion which is not necessarily supported by local job opportunities. The vision will need to be addressed in relation to the impact of COVID-19 19 on the survival of the businesses in the Town Centres.

Covid-19 has forced businesses, to reassess the most appropriate workplace for their office-based employees.

What modelling is available, and what consultation is taking place with businesses to evaluate the possible effect of Covid-19 on the workplace?

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

**Do you agree that the Objectives should remain the same for the new plan?**

Yes		No		Unsure	✓
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**If not please provide details.**

**Objective 8**

*To retain and improve accessibility for all to employment, services, community, leisure and cultural activities through:*

- *Integrating development and transport provision, ensuring new development is located where it is most accessible by a range of modes of transport;*
- *Retaining and upgrading existing infrastructure related to transport and communications;*  
*and*
- *Ensuring choice and encouraging the use of public transport, walking and cycling, for as many journeys as possible*

**This Objective does not translate in to planning policy, and it is difficult to identify where consideration has been made for transport links that would result in the reduction in travel by car.**

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

Yes		No		Unsure	✓
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**If not please provide details.**

**See later responses to questions.**

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

Yes	✓	No		Unsure	
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**If not please provide details**

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**If not, please provide details of what changes you think should be made.**

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**If not, please provide details of what changes you think should be made.**

*The NPPF 2019 states*  
**78.** *To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.*  
 Based on this extract from the NPPF Para. 78, we believe there is a strong case for a review of the hierarchy and future development within the Larger Villages. And we believe this is supported by the following extract from the **South Kesteven District Council Local Plan 2011- 2036 - Settlement Hierarchy Review**  
**6. FUTURE REVIEW**  
*6.1 The review of the LSCs has been based upon surveys that were correct as of November 2016. It is recognised that information on services and facilities may have changed since the surveys were undertaken and that the information will only be correct at a particular point in time. The data will be checked before the Regulation 19 Publication of the Local Plan.*  
**We are not aware of the outcome of the data check undertaken before the Regulation 19 Publication of the Local Plan.**  
**However, there are several observations regarding the Large Village Hierarchy which we believe raise legitimate questions regarding the assessment protocols and how this hierarchy will be managed between now and 2041, particularly with the housing need in the district having increased.**  
**We believe the scoring system is too simplistic to account for the quality of each of the measures that are assessed and in fact does not follow the scoring system and Core Strategy Criteria explained in the Settlement Hierarchy Review 2011 – 2036.**  
**The assessment ignores the exhaustive and thorough examination of Larger Villages, then Local Service Centres (LSC’s) in the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) Addendum Report June 2013.**

**There has been little change in the hierarchy assessments which placed the LCS's in to four tiers based on several SEA Objectives, and the individual assessment of each village as a response to those objectives. Table 1 demonstrates that the previous LSC assessment identified five of the highest scoring villages in the Larger Village Assessment as being in the highest tier, Tier 1, villages with the fullest range of local services and facilities, GP, primary school with capacity and a good range of employment opportunities located within them. We believe that the identification of these top scoring villages based on two separate assessments is important for the future Vision and Housing Development in the Larger Villages.**

**Table 1. Settlement Hierarchy scores for Services. (Some scores from the table are hidden. See Appendix 1 for the full table)**

Parish Council/Villages	Food shop / local shop	Bus service to nearest urban area (Hourly or more often)	Bus service (1-3 hours/ 4-6 per day)	Post Office	Public House	Doctors	Village Total Assessment Score	Village Settlement Hierarchy Ranking	SA/SEA Addendum Report June 2013 L.S.C. Tiers
Corby Glen	9	0	3	3	4	4	53	1	1
Long Bennington	6	0	3	3	5	3	49	2	1
Billingborough	6	0	3	3	3	3	43	3	1
Harlaxton	6	5	0	1	3	3	42	4	3
Colsterworth	6	0	3	3	3	3	41	5	1
Caythorpe and Frieston	6	4	0	3	4	3	40	6	1
Langtoft	6	4	0	1	0	0	38	7	2
South Witham	6	0	3	1	4	1	38	8	4
Ancaster	6	0	0	3	3	3	37	9	4
Morton	6	4	0	3	3	0	37	10	2
Barrowby	6	4	0	3	3	0	36	11	2
Thurlby & Northorpe	6	4	0	1	3	0	35	12	3
Great Gonerby	6	4	0	3	3	0	34	13	2
Barkston	6	4	3	1	3	0	32	14	4
Baston	6	4	0	1	4	0	32	15	3

**N.B**

**Why do Post Offices have different scores?**

**Why do all villages score six (6) for a foodshop/local store?**

**Why does an hourly or more frequent bus service score (4) when it is too far away from the main village and hardly used by the community?**

### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	✓	No		Unsure	
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If so, please outline any suitable and deliverable proposals.

**Corby Glen, Long Bennington and Colsterworth**

The existing Village hierarchy based on facilities, services and amenities places Corby Glen, Long Bennington and Colsterworth in the top five of the fifteen designated Larger Villages.

Each of these settlements has the following:

- Primary School,
- Food Shop,
- Bus service including school buses,
- Village Hall,
- Post Office,
- Public House,
- Recreational and open spaces with equipped play spaces for children,
- Doctors
- Police and/or Fire front line services.

This exceptional range of services sets these three settlements apart from the other larger villages in the Settlement hierarchy Table 1.

The position of these villages to the main towns of Grantham, Stamford and Bourne, make them the ideal centres for sustainable growth, becoming less dependent on travel to the existing main centres for employment and the day to day essential needs of their communities.

Their respective locations also provide ideal opportunity for Growth over the lifetime of the Local Plan to 2041. These three villages could absorb all the projected growth of the Larger Villages based on the increase likely to come from the Government projection for house building as described in para 4.10 and meets Objective 7.

Corby Glen is equidistant from Grantham and Bourne on the A151 which will provide good connections to the A1 Trunk Road with the completion of the Grantham Southern perimeter Road.

Long Bennington is seven miles to the north of Grantham and six miles to the south of Newark and is adjacent to the A1 Trunk Road providing opportunity for location of distribution and business units.

Colsterworth is eight miles to the south of Grantham and twelve miles to the north of Stamford and is adjacent to the A1 Trunk Road, with good connections to Melton Mowbray to the west.

Furthermore, we believe that Corby Glen, with its unique geographical and topographical position in South Kesteven offers an exciting challenge for a truly sustainable development based on Garden Village principles. This would also be a favourable contribution to the spatial distribution of housing growth and would with perhaps similar growth in Long Bennington and Colsterworth would be realistic to the contribution that could be made to housing growth within the proposed plan period.

The NPPF supports where there are groups of smaller settlements, development in one village may support services in a village nearby. Corby Glen, Long Bennington and Colsterworth would meet the test of supporting smaller settlements in their vicinity and reduce the number of miles travelled by car where people currently travel to a main town for their food shopping.

**Morton, Thurlby and Northorpe, Baston and Langtoft**

**We believe that further development along the A15 corridor between Morton and Market Deeping should be capped at the present numbers in The Local Plan 2011- 2036. This A15 corridor from Bourne to Market Deeping is the busiest Primary Road in South Kesteven and only second in volume of traffic to the A1 trunk Road.**

**Table 2 ranks the Larger Village Settlements by population. The four Larger Villages on the A15 corridor account for 33% of the total Larger Village population.**

**The proximity of Thurlby and Northorpe, Baston, and Langtoft to Bourne and Market Deeping, also makes the sustainability of the three villages a challenge, with supermarkets being the dominant retailers in Bourne and Market Deeping. The proximity to Bourne and Market Deeping also limits the likelihood of Doctors or Police/Fire front line services being cited in the villages. Further development in these three villages only increases the use of cars for work and shopping.**

**Table 2. Settlement Hierarchy by Population compared to Services Ranking.**

Parish Council/Villages	Total Pop (2011 Parish)	Dwelling No 2011	Village Total Assessment Score	Larger Village Settlement Hierarchy Ranking	SA/SEA Addendum Report June 2013 L.S.C. Tiers
Morton	2406	1022	37	10	2
Great Gonerby	2200	988	34	13	2
Thurlby & Northorpe	2153	913	35	12	3
Langtoft	2045	828	38	7	2
Long Bennington	2018	903	49	2	1
Barrowby	1952	854	36	11	2
Colsterworth	1713	768	41	5	1
Ancaster	1647	718	37	9	4
South Witham	1533	716	38	8	3
Baston	1444	589	32	15	3
Billingborough	1401	612	43	3	1
Caythorpe and Frieston	1374	574	40	6	1
Corby Glen	1017	440	53	1	1
Harlaxton	782	370	42	4	3
Barkston	493	236	32	14	4

**Table 3. Distance travelled to work ONS Crown Copyright Reserved [Nomis on 18 November 2020]**

Ranking by Distance		
parish 2011	Total distance (km)	Ranking
E04005929 : Morton & Hanthorpe	24,554	1
E04005947 : Thurlby	21,482	2
E04005926 : Long Bennington	21,326	3
E04005921 : Langtoft	21,016	4
E04005939 : South Witham	17,386	5
E04005894 : Colsterworth	16,726	6
E04005907 : Great Gonerby	16,699	7
E04005874 : Ancaster	15,985	8
E04005879 : Baston	15,354	9
E04005878 : Barrowby	15,324	10
E04005881 : Billingborough	12,112	11
E04005892 : Caythorpe	10,918	12
E04005895 : Corby Glen	10,060	13
E04005912 : Harlaxton	7,078	14
E04005877 : Barkston	3,568	15

**Table 3 demonstrates that people living in Morton (including Hanthorpe), Thurlby and Northorpe, Baston and Langtoft travel greater distances to work and statistics show that the combined travel in the four villages is 36% of the 230,000 miles travelled by people in the Larger Villages as a whole.**

**The number of people in the four villages travelling further than 10km to work is 37% of the total number of people living in the larger villages and travelling further than 10km.**

**The number of people in the four villages travelling less than 10km to work is 33% of the total number of people living in the larger villages and travelling less than 10km**

**The number of people in the four villages working from home or classified as 'Other' is 34% of the total number of people living in the larger villages either working from home or classified as 'Other'.**

**In addition, the average distance travelled to work in the Larger Villages is 25.3 km, compared to Grantham 11km and Stamford, Bourne and Market Deeping 19.5km.**

**Table 4. Method of travel to work ONS Crown Copyright Reserved [Nomis on 17 November 2020]**

<b>parish 2011</b>	<b>All categories: Method of travel to work</b>	<b>Driving a car or van</b>	<b>Passenger in a car or van</b>
E04005874 : Ancaster	827	614	41
E04005877 : Barkston	209	153	11
E04005878 : Barrowby	902	668	59
E04005879 : Baston	717	545	22
E04005881 : Billingborough	667	455	31
E04005892 : Caythorpe	631	442	16
E04005894 : Colsterworth	824	622	39
E04005895 : Corby Glen	491	338	16
E04005907 : Great Gonerby	966	685	56
E04005912 : Harlaxton	333	247	10
E04005921 : Langtoft	1,108	859	44
E04005926 : Long Bennington	896	618	33
E04005929 : Morton & Hanthorpe	1,216	928	71
E04005939 : South Witham	865	680	30
E04005947 : Thurlby	1,126	850	62
Total	11,778	8,704	541
Average %		73.9%	4.6%

**Table 4 illustrates the dependency on driving or being a passenger in a car or van to travel to work.**

**In the four villages along the A15 corridor, 81% travel to work by car or van, compared to the average for larger villages of 78.5%.**

**This figure illustrates the further distance that needs to be travelled, probably away from other public transport services. Despite a regular half hourly bus service along the A15 corridor, only 1.8% use the service to travel to work, apart from Langtoft at 3.1%.**

**Further building development in addition to the Allocations in the Local Plan 2011 – 2036 is likely to increase car and van travel to work, as development sites are likely to be more distant from the bus route along the A15 corridor.**

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	✓
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If not, what evidence do you have to justify an alternative need and requirement?

There is no evidence that this increase will have environmental benefits.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	✓
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If not, please provide details and any alternative proposals.

Ideal location adjacent to A1, but the further planned expansion to the south and north east is not accompanied by proposals which will have a positive effect on reduction of the carbon footprint

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	✓
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If not, please provide details and any alternative proposals.

Through routes in Stamford are non-existent. The A15 passes through the town centre of Bourne. Any further development in these two towns above that already planned must be supported by improvements and additions to the road network which will relieve congestion. Other restrictive methods of traffic movement should also be considered.

### Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

We have put forward considerations for growth in larger Villages. These include a cap on allocations along the A15 corridor for Morton, Thurlby with Northorpe, Baston and Langtoft, and expansion in the Larger Villages of Corby Glen, Colsterworth and Long Bennington based on the evidence of their services being superior to other villages, and their locations providing excellent transport links.

### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

Billingborough and Caythorpe with Frieston were assessed as Tier 1, villages with the fullest range of local services and facilities, GP, primary school with capacity and a good range of employment opportunities located within them when Local Service Centres were assessed in 2013.

The sustainability of these villages would benefit from further development as their locations are sufficiently distant from Sleaford and Grantham.

Growth in these villages would also be supported by NPPF (2019) para. 78.

### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

## 12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation

### Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	✓	Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

We have provided evidence through the Census 2011 and Nomis tables, that illustrate more must be done to reduce the District carbon footprint for travel by car.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	✓	No		Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
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Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
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Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

Appendix 1 the the Local Plan Review (2041)

Settlement Hierarchy Facilities, Services and Amenity Assessment Local Plan 2011-2036

Parish Council/Villages	Change in population	Total Pop (2011 Parish)	Total Pop 2001 (Parish)	Dwelling No 2011	Primary school	Food shop / local shop	Bus service to nearest urban area (Hourly or more)	Bus service (1-3 hours/4-6 per day)	Train Station	Village Hall / Meeting Hall / Memorial Hall	Post Office	Public House	Recreational / open space (all ages)	Equip play space	Bus service (3 hours or less frequent)	School Bus	Doctors	Police / Fire	Secondary School	Other Services (from Business Rates)	Local Business	Day nursery, pre-school playground,c	Mobile library	Village Total Assessment Score	Village Settlement Hierarchy Ranking
Corby Glen	298	1017	719	440	6	9	0	3	0	4	3	4	2	2	2	2	4	2	3	2	2	2	1	53	1
Long Bennington	175	2018	1843	903	6	6	0	3	0	3	3	5	2	2	0	2	3	2	0	3	6	2	1	49	2
Billingborough	303	1401	1098	612	6	6	0	3	0	3	3	3	2	2	0	5	3	1	0	1	4	0	1	43	3
Harlaxton	77	782	705	370	6	6	5	0	0	3	1	3	2	2	0	2	3	0	0	5	1	2	1	42	4
Colsterworth	205	1713	1508	768	6	6	0	3	0	3	3	3	2	3	0	2	3	1	0	1	2	2	1	41	5
Caythorpe and Frieston	-98	1374	1472	574	6	6	4	0	0	3	3	4	3	2	0	0	3	2	0	0	1	2	1	40	6
Langtoft	121	2045	1924	828	6	6	4	0	0	3	1	0	4	3	0	2	0	0	0	1	5	2	1	38	7
South Witham	94	1533	1439	716	6	6	0	3	0	3	1	4	3	2	2	2	1	0	0	1	1	2	1	38	8
Ancaster	330	1647	1317	718	6	6	0	0	3	3	3	3	2	2	0	0	3	0	0	1	2	2	1	37	9
Morton	54	2406	2352	1022	6	6	4	0	0	3	3	3	2	2	0	2	0	0	0	1	2	2	1	37	10
Barrowby	-44	1952	1996	854	6	6	4	0	0	3	3	3	3	2	0	2	0	0	0	0	1	2	1	36	11
Thurlby & Northorpe	17	2153	2136	913	6	6	4	0	0	3	1	3	2	2	0	2	0	0	0	1	2	2	1	35	12
Great Gonerby	150	2200	2050	988	6	6	4	0	0	3	3	3	2	2	0	0	0	0	0	2	1	2	0	34	13
Barkston	-4	493	497	236	6	6	4	3	0	3	1	3	2	2	0	0	0	0	0	0	1	0	1	32	14
Baston	-25	1444	1469	589	6	6	4	0	0	3	1	4	2	2	0	0	0	0	0	0	1	2	1	32	15

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CN:

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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

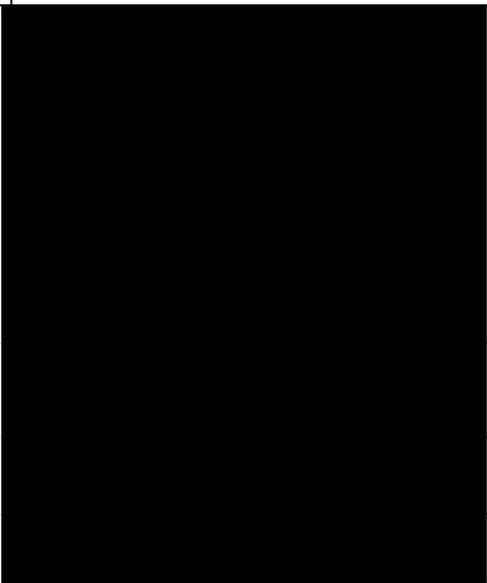
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The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

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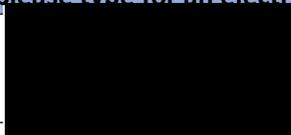
**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name		Martin
Last Name		Herbert
Organisation		Brown & Co – Property and Business Consultants LLP
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23 <sup>rd</sup> November 2020

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**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No	✓	Unsure	
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If not please provide details.

Whilst it is accepted that there should be a general predominance towards housing growth being in the major towns, there needs to be more variety and opportunities for village development. There needs to be a shift in the balance towards providing other housing sites. It is not everybody's desire to live in large housing estates in town and this view has been reinforced by recent market activity and controls and constraints that have been introduced as a result of the pandemic. There are more people working from home who would wish to have available open countryside in closer proximity for recreational and general leisure pursuits and there will be less demand on infrastructure in the future as more people work from home. The demographics and spatial distribution policies need to reflect that. The rate of delivery from the large housing sites has not met with expectation and more flexibility in the system generally needs to be introduced. In the NPPF para 8 the social objective needs should be reviewed when assessing the presumption in favour of sustainable development and in particular para 11. The Plan aspirational (para 16). The need to boost the supply of homes (and the figures should be a minimum) is important as it is, consistent with para 59 of the NPPF, making sure that a sufficient amount and VARIETY of land can come forward.

A wider variety of sites particularly in rural areas will encourage healthier lifestyles as expected under para 91 of the NPPF. There is on rural sites a greater opportunity to provide multiple benefits (para 118 NPPF).

It is accepted that there needs to be a revised Plan Period and housing growth level.

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	✓
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If not please provide details.

Reflection needs to be taken of the matters mentioned in Q1a above.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes		No	✓	Unsure	
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If not please provide details.

Generally the objectives are reasonable, but there needs to be, as alluded to previously, a slight shift in the balance of objectives towards housing variety and locations to reflect demographic and other social changes which are happening and which have been accelerated as a result of issues arising from the pandemic. There is within South Kesteven District Council a lower proportion of housing available in village-type sites which are keenly sought after and very few available because of the constraints that have been applied in the past. With greater opportunities and an understanding of changes in social habits, this will support the view that there should be more village-type development to cater for this particular need. Policies SP2, 3 and 4 are very restrictive compared to other Plans.

#### 7. Proposal 3 – Policies not proposed to be changed significantly

##### Q3 – Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No	✓	Unsure	
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If not please provide details.

To accommodate comments previously made and further in this paper, there needs to be a general review of the spatial and housing policies to create additional opportunities and variety in the spatial distribution and housing opportunities within the District.

#### 8. Proposal 4 – Plan Period

##### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

#### 9. Proposal 5 – Settlement Hierarchy

##### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	✓	Unsure	
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If not, please provide details of what changes you think should be made.

Dependent in changes that are made to the housing distribution, we contend that there are some villages which should move away from the smaller village category and receive greater support for housing growth. Generally the principle of key larger service centres is accepted, but in terms of small villages, there should be, we feel, consistent with the Central Lincolnshire Plan, a further interim category. In the Central Lincolnshire Plan after the main towns there are three village categories. There are the larger villages, medium villages and small villages. Beyond that generally villages are classified as either hamlets or countryside where generally it is accepted, because of the size of the villages, stricter controls are necessary. The greater

proportion of the development should be allocated to the large and medium villages with small-scale opportunities less constrained in the small villages.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No	✓	Unsure	
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If not, please provide details of what changes you think should be made.

Because of the pandemic and generally the need to provide suitable alternative locations, a methodology review would be appropriate to make sure there is a better distribution of housing opportunities to accommodate need.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	✓	Unsure	
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If so, please outline any suitable and deliverable proposals.

There is plenty of opportunities within the towns and villages to avoid the need for a new Greenfield settlement site.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	✓
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If not, what evidence do you have to justify an alternative need and requirement?

The answer to this is probably yes, but this needs to be regularly reviewed with emerging data as the Plan review progresses.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

Subject to there being flexibility in other locations as referred to previously.

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

Yes	✓	No		Unsure	
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**If not, please provide details and any alternative proposals.**

**Subject to there being flexibility in other locations as referred to previously.**

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

Yes	✓	No		Unsure	
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**If not, please provide details and any alternative proposals.**

**Subject to there being greater opportunity in other villages as indicated below.**

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes		No	✓	Unsure	
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**If not, please provide details and any alternative proposals.**

**Fundamentally this Policy needs to be changed to be more enabling in other village location sites in the categories indicated before, i.e. large, medium and, to an extent, smaller villages. We contend that there needs to be more flexibility for the reasons previously mentioned and that the Plan should be more accommodating in line with other Local Plans and in particular the Central Lincolnshire Local Plan which does encourage growth in all villages albeit those without any services should be more constrained. In the villages generally, the Plan policies are too restrictive and should be more in line with Policy LP2 in the Central Lincolnshire Plan with growth in the larger/medium villages the key focus. This is working in the Central Lincolnshire area and would achieve the variety that is needed and which would be compliant with the NPPF. Unfortunately, very few Neighbourhood Plans have come forward because of the cost and time that is needed to produce such a Plan. There is, unfortunately, a general reservation by many communities to any form of expansion, but there needs to be to produce good housing opportunities across the District and to give a greater choice to households in view of changing economic and social habits. The proposals in the Central Lincolnshire Plan are, we feel, helpful and give a much clearer guidance as to what growth would be permissible and this is a Policy that should, we feel, be replicated in the South Kesteven Local Plan. Growth in all of the key villages should be encouraged and the figure in the table on page 16 covering other settlements should be increased above the 600 proposed.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes	✓	No		Unsure	
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**Please provide details**

**There needs to be a thorough analysis of delivery and need and the methodology that applies to allocations for the reasons previously explained.**

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
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If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
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If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	✓	No		Unsure	
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
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Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

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**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

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Yes		No		Unsure	
<b>Please give details</b>					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes		No		Unsure	
<b>Please give details</b>					

<b>18. Any other Comments</b>					
<b>Q14 – Any other Comments</b>					
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?					

**Part C: Sustainability Appraisal Scoping Report**

<b>19. Comments about the Sustainability Appraisal Scoping Report</b>					

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0080

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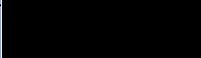
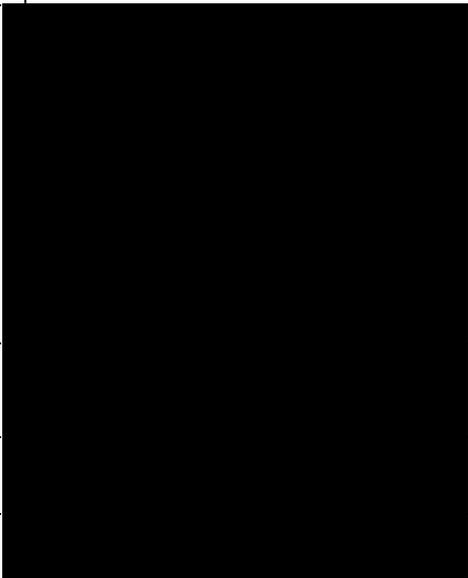
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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	Mrs
First Name	Geoffrey	Sarah
Last Name	Fearn	Clark
Organisation	G.E & B Fearn Farms Limited	Planning and Design Group (UK) Limited
Address		
Postcode		
Telephone		
Email Address		

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**4. Please Sign and date this form**

	type for an electronic response)	Date
		20/11/2020

## Part B: Issue and Options Consultation Questions

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	X	No		Unsure	
If not please provide details.					
G.E & B Fearn Farms Limited support the overall Vision, which aspires to direct growth to the most sustainable settlements. New growth in Larger Villages, including Long Bennington, is required and supported to enhance the vitality and viability of these areas. Housing delivery should be proportionate to each settlement in order to fully meet capacity needs.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	X	Unsure	
If not please provide details.					
Housing growth will play an important role in the economic recovery of South Kesteven District and as a result, it is vital that the District creates the most favourable environment to support the delivery of new housing.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No	X	Unsure	
If not please provide details.					
The premise of each objective is supported by G. E & B Fearn Farms Limited however, details of the interrelationship between the different objectives is required.					
Further, Objective 6 states that the role and function of the four main towns will be enhanced and the focal point for growth across the District. Whilst this Objective is not objectionable itself, the current strategy for growth in Grantham and Stamford is heavily reliant on delivery of SUEs whereas the National Planning Policy Framework highlights the importance of a sufficient amount and variety of land coming forward where it is needed, and this should be reflected as an objective. Accordingly, it is necessary and appropriate to refer to the role of all settlements, particularly larger villages, in ensuring growth, at Objective 10.					
Further still, whilst Objective 7 is correct in its desire to maximise use of previously developed land, this should not be viewed as more important than delivering high numbers of dwellings as required across the District, including on greenfield land.					

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<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not, please provide details of what changes you think should be made.					
<p>The premise of the hierarchy is supported, with four 'tiers' corresponding with the number of services each settlement has. Development should be directed towards settlements with the most services, which often represent the most sustainable locations for growth. However, development on sites within Larger Villages with a good variety of services should be preferred locations for growth over periphery sites at Stamford, Bourne and the Deepings, as they better represent a sustainable pattern of development and attract inward investment.</p> <p>The Council's proposal to review the potential for a new settlement, utilising garden city principles, is not fully supported. It has been proven elsewhere that a strategy of urban expansion reliant on a new settlement is difficult to bring forward in terms of multiple ownerships, large scale infrastructure requirements, upfront financial burdens, and issues with ensuring developments are self-sustaining. Housing delivery should be proportionate to each settlement in order to fully meet capacity needs. The allocation of increased numbers and spread of new housing will provide more market choice and speed up take-up and delivery. An appropriate balance of urban expansion and more dispersed growth is necessary.</p>					

### Q5b – Settlement Hierarchy Methodology

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

The requirements for a Larger Village to have a primary school and local shop, in addition to its proximity to a main town, is suitable to ensure that future development will be served by services and infrastructure to meet day to day needs and support the ongoing viability and vitality of the settlement.

### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

Please see response to Q5a. Furthermore, It is widely accepted and proven in the examination of Local Plans that higher housing delivery is achieved by allowing development on more sites (number), in all settlements, and on sites of varying sizes. At present, however, there appears to be an overreliance on delivery of the Sustainable Urban Extensions at Grantham and Stamford. The risk of significant delays to delivery is such that the Council's Vision must emphasise the role of Larger Villages and delivery on smaller sites in order to achieve aspired economic recovery.

## 10. Proposal 6 – Housing Need and Requirement

### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

The housing requirement for South Kesteven District must be established using the new standard method for calculating housing need, subject to any legal challenges or changes.

It should be noted however, that the housing target is a minimum and a high growth scenario should be supported, in conformity with the critical objective of the National Planning Policy Framework to boost significantly the supply of housing. The NPPF stipulates that local planning authorities should seek to supply over the requisite housing requirement set out by the standard method.

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

Whilst development should be directed to the most sustainable locations, therefore being Grantham, G.W & B Fearn Farms do not support that the level of growth should be specified as a percentage figure. This limits flexibility for additional sites to come forward to meet local growth needs, which go beyond the remaining 50% of growth required across the District.

The allocation of increased numbers and spread of new housing will provide more market choice and speed take-up and delivery. A more dispersed growth strategy is further supported by the seismic change in the nature of travel patterns and commuting we are experiencing, as well as changes to the retail focus of the main town centres. This change together with changing market demand supports focussing some growth to all settlements in South Kesteven.

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>	<b>x</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

Please see response to Q7a.

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there is a range of available services and facilities?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

It is imperative that housing growth is directed to all settlements of all sizes. Larger Villages play a crucial role in supporting housing delivery. Proportionate development in Larger Villages supports continued service provision and continued viability and viability of a village. Please also see response to Q7a.

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

Higher housing delivery is achieved by allowing (and allocating) development on more sites (number), in all settlements, and on sites of varying sizes. Allocation of smaller sites in smaller sites will support housing delivery, increase housing choice and availability, and should not therefore be precluded.

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**Please provide details**

Whilst market capacity and deliverability are key considerations, specific growth scenarios can limit the scope for sustainable located opportunity sites to come forward for development in order to meet overall future growth needs.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If yes, please provide details.**

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not, please provide details.**

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details.</b>					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
<b>Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.</b>					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
<b>Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
<b>Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>Please give details.</b>					
<b>Q11c – Viability Implications of Higher Energy Performance Standards</b>					
<b>If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please</b>					

provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

#### 16. Proposal 12 – Need for Caravan Accommodation

##### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes

No

Unsure

Please give details

#### 17. Proposal 13 – Parking Standards

##### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes

No

Unsure

Please give details

#### 18. Any other Comments

##### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

#### Part C: Sustainability Appraisal Scoping Report

#### 19. Comments about the Sustainability Appraisal Scoping Report

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0081

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

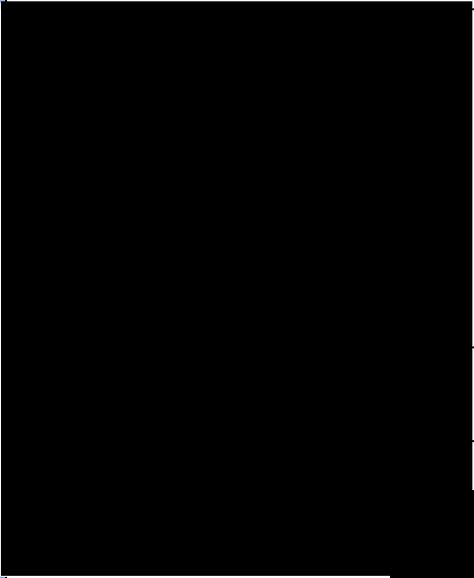
**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Nick	
Last Name	Sandford	
Organisation	The Woodland Trust	
Address		
Postcode		
Telephone		
Email Address		

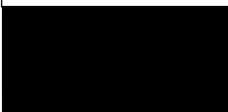
*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

**If you do not wish to be added or would like your details to be removed, then please select the following box**

*Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.*

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23/11/20

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No	x	Unsure	
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**If not please provide details.**

We would like to see the bullet points in relation to development and the natural environment to be amended to state that development should only be allowed to go ahead if it protects existing natural features and creates new ones to ensure that all residents have easy access to and can benefit from them. Eg: “Development should protect the natural and built environment and create new areas of natural habitat so that all residents have easy access to them and the benefits that they provide”

In the paragraph on Grantham would like to see reference to the need to significantly increase the amount of green open space, including street trees, in Grantham Town Centre, in order to create a more pleasant living and working environment, and that the new Garden Village at Spitalgate Heath should have exemplar high quality trees and green infrastructure designed in from the start.

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

**If not please provide details.**

We would like to see a more specific reference to the need to tackle climate change, through both mitigation and adaptation.

Eg “The District will have a successful, diverse economy providing employment opportunities for the local workforce, equipped with a wide range of skills to meet employer needs. It will be an area of sustainable, low carbon, high quality growth and a popular place to work, live, visit and invest in and where effective action is taken to reduce carbon emissions and adapt to the impacts of climate change. “

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes		No	x	Unsure	
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**If not please provide details.**

We would like to see Objective 13 on climate change significantly strengthened and moved up to no1 objective, so that it is seen as being overarching and encompassing economic, social and environmental aims. It would be appropriate for this objective to refer to the Council’s climate emergency objective of reaching net zero carbon by 2050. We would also like to see tree planting and inclusion of green infrastructure in new development be not just “investigated” but commitment made to including it in all development. Ideally we would like to see an overarching climate change objective at the beginning of this section and then a separate objective on trees and green infrastructure under the environmental section: we would like this to contain a commitment to producing a trees and woodland strategy for the Council which will set tree canopy cover targets for new development. NB: we have already had discussions with the Council leader and with the relevant director about this and we are keen to work with the Council to help them develop a tree strategy which would be of exemplar quality, to reflect the fact that the Woodland Trust has its headquarters in Grantham.

Eg: Objective1 : “To plan for and reduce the impacts of climate change by ensuring that new development contributes to the Council’s stated aim of getting the district to net zero carbon by 2050 by seeking to reduce carbon emissions significantly from all sources, by enabling adaptation to the climate change that is already happening (eg by reducing the risk of flooding) and by sequestering carbon through tree planting and other measures. “

Amended Objective 12: “To ensure that existing green infrastructure (including natural habitats such as tree and woodland) and historic and cultural assets, are protected and restored wherever possible. To ensure that any loss to development of irreplaceable historic, cultural or natural assets (such as ancient woodland) is wholly exceptional. To enhance and expand green infrastructure through good design and improved networks that respect important local characteristics, ensuring new development is well designed, promotes local distinctiveness, integrates effectively with its setting and secures community safety. To produce a Trees and Woodland Strategy for the Council which sets tree canopy cover targets for new development.”

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

Yes		No	x	Unsure	
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**If not please provide details.**

We would like to see amendments to policy EN2 on biodiversity and to EN3 on green infrastructure. The paragraph in Policy EN2 about ancient woodland protection is no longer compliant with national planning policy, as it uses the wording found in an earlier version of the National Planning Policy Framework (NPPF).

“.....fragmentation of irreplaceable habitats, including ancient woodland and aged or veteran trees, unless the need for, and benefits of, the development in that location clearly outweigh the loss or harm.”

The protection of ancient woodland and veteran trees was significantly strengthened by para 175c of the new NPPF which was passed two years ago:

“(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons 58 and a suitable compensation strategy exists.”

This revision to your local plan gives an ideal opportunity to amend the wording of EN2 to strengthen ancient woodland and aged/veteran tree protection and ensure that these habitats are given the maximum possible protection from development.

We would also like to see the wording of EN3 strengthened along the lines we suggest for a new Objective 12: ie to put a much greater emphasis on creating new areas of natural greenspace, including new trees and woodland, as part of new development, so as to create healthy and attractive places where people can live and work. There is much evidence to show that giving people access to natural greenspace has many social and economic, as well as environmental benefits. We would suggest that the new policy includes an access standard: eg the Natural England Access to Natural Greenspace Standard or the Woodland Trust’s Access to Woodland Standard. We would also like the new policy to commit the Council to production of a Trees and Woodland Strategy (or if not that, a trees and woodland spd) which could set tree canopy cover targets for new development: in our Emergency Tree Plan, published earlier this year, the Woodland Trust advocates a minimum of 30% tree canopy cover in new development but we would be happy to discuss with the Council what target would be relevant and achievable in South Kesteven.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**If not please provide details**

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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**If not, please provide details of what changes you think should be made.**

We do not have views on this or many of the other questions below, as they are not directly relevant to the work of the Woodland Trust

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to**

**determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>	<b>x</b>	<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**We have included this in our answer to the previous question.**

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If so, please outline any suitable and deliverable proposals.**

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, what evidence do you have to justify an alternative need and requirement?**

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	x
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	x
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	x
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If not, please provide details and any alternative proposals.

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**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	x
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Please provide details

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	x
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If yes, please provide details.

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### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	x
-----	--	----	--	--------	---

If not, please provide details.

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#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	x
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If not, please provide details.

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### 14. Proposal 10 – Climate Change

#### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	x	Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

**No.** As we have indicated in our answers about about the vision and the objectives, we would like to see tackling climate change given a much greater prominence in the revised local plan, to reflect the commitment that the Council has given in its decision to declare a climate emergency and commit to net zero carbon by 2050.

We would like to see this reflect the different types of measures which are needed:

1. To reduce carbon emissions from all sources
2. To enable adaptation to the impact of climate change
3. To sequester carbon through a variety of measures, including new tree and woodland planting.

We have previously mentioned the need for the Council to have a tree strategy and we would like to see this a comprehensive one, covering both trees on council land (enhancing its current tree management approach) and also trees on private land. The need for a tree strategy could be referenced in the climate change policy in the revised local plan.

The climate policy should also link to other relevant policies in the plan: eg those on quality of housing development and on transport. A useful tool used in local plans in other councils is the Transport User Hierachy, which sets out that in transport planning preference should be given to different modes of transport in a set order: eg pedestrians and cyclists first, then public transport etc.

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

##### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

##### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

<b>16. Proposal 12 – Need for Caravan Accommodation</b>					
<b>Q12 – Need for Caravan Accommodation</b>					
Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.					
Yes		No		Unsure	
Please give details					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes		No		Unsure	
Please give details					

<b>18. Any other Comments</b>					
<b>Q14 – Any other Comments</b>					
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?					
<p>As South Kesteven includes our Head Office, in Grantham, we would be really interested in having a discussion with planning policy officers about the proposed revision to your local plan. Please contact me if you would like to set up a short online discussion.</p> <p>We are actively engaging with the Council about work on a new tree strategy and also to discuss ways in which trees and woods can be included as part of GI in the new Spitalgate Heath Garden Village.</p> <p>As you may know, we do have a particular concern about the threat to existing woodland posed by the proposed new housing development at Prince William of Gloucester Barracks in Grantham. The Woodland Trust planted some new woodland there about 8 years ago as part of the Queen’s Diamond Jubilee celebrations and were concerned to hear that a substantial part of</p>					

the new woodland could potentially be lost to the proposed new housing development. We would like to see your revised local plan make a strong commitment to retaining as much of the new woodland as possible. With some imaginative planning and thought, we believe that the site could accommodate some housing but also retain a significant area of woodland, which could provide a fantastic amenity for both the new residents and for people from other parts of Grantham. We are keen to work with the landowners, the developers and the Council in order to achieve this.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**

**Amy Bonfield**

---

**From:** [REDACTED]  
**Sent:** 23 November 2020 13:43  
**To:** PLANNING POLICY  
**Subject:** Re: South Kesteven District Council Local Plan Review - Issues and Options Report - Public Consultation

**Categories:** Yellow Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Mr Ranson,  
I do not approve of any of your policies.  
Azar Woods  
For Stamford Bypass Group.

----- Original Message -----

From: "PLANNING POLICY" <PLANNINGPOLICY@southkesteven.gov.uk>  
To: "PLANNING POLICY" <PLANNINGPOLICY@southkesteven.gov.uk>  
Sent: Monday, 16 Nov, 2020 At 12:32  
Subject: South Kesteven District Council Local Plan Review - Issues and Options Report - Public Consultation



Dear Sir/Madam, Date: Monday 16<sup>th</sup> November 2020

### **PLANNING POLICY CONSULTATIONS**

#### **South Kesteven Local Plan Review – Issues and Options Report – Public Consultation**

This is a reminder that the consultation on the South Kesteven Local Plan Review - [Issues and Options Report](#) is due to close **11.59pm on the Monday 23<sup>rd</sup> November 2020.**

Please see below the original email with information of this consultation. If you have any comments on the Issues and Options Report please fill in the response form available to download on the [website](#) and return by 11.59pm Monday 23<sup>rd</sup> November 2020.

**Please return your response to email by [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)**

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit spread of the infection. The return of forms via email is therefore preferred.

Yours sincerely,

*Roger Ranson*

Roger Ranson – Head of Planning Policy



Dear Sir or Madam, Date: Thursday 8th October 2020

**PLANNING POLICY CONSULTATIONS**

**South Kesteven Local Plan Review – Issues and Options Report - Public Consultation**

South Kesteven District Council is undertaking its first public consultation on the review of the Local Plan between **Monday 12<sup>th</sup> October 2020 and Monday 23<sup>rd</sup> November 2020.**

The current Local Plan for South Kesteven was adopted in January 2020 and sets out the development strategy for growth of the District to 2036. The Inspector’s final report on the current [Local Plan \(2011-2036\)](#) commits the Council to undertake an early review of the Local Plan from April 2020 with submission by the end of December 2023. The Council has begun the process of preparing a new Local Plan for the District, which will set out the planning framework for the District over the next 20 years up to 2041. The review enables necessary updates of evidence, and the Council to consider whether its local housing need has changed and needs to be re-evaluated taking into consideration changes to national planning guidance.

The timetable for the review of the Local Plan is anticipated to be examined from January 2024 and adopted in January 2025, until the review has been undertaken and a new Local Plan is found sound and adopted by the Council, the current Local Plan (2011-2036) will continue to be the development plan for the District and used in determining planning applications.

The Issues and Options consultation is the first opportunity for the local community to become involved in the preparation of the Local Plan Review, which sets out the scope of the key policies and proposals to be considered within the review. Reviewing the plan now can help ensure that it remains up to date and that South Kesteven will continue to grow sustainably, meeting the needs of its residents and businesses whilst protecting what is special about the area. At this stage, the Issues and Options consultation is not a statement of the Council’s proposed planning policies but a statement of intention as to what planning policies may need to be reviewed and updated. The Issues and Options paper asks a series of questions which will help the Council determine the scope and content of the Local Plan review.

As part of the Local Plan Review, the Council has also prepared a Sustainability Appraisal Scoping Report which is published for comment alongside the consultation paper.

Consultation responses should focus on the questions asked in the consultation paper using the response form available on the Council’s website.

Please return completed forms by **11.59pm Monday 23<sup>rd</sup> November 2020** to [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit spread of the infection. The return of forms via email is therefore preferred.

The documents, along with further details of the consultation will be available for inspection from Monday 12<sup>th</sup> October on the Council website;

<http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

**Hardcopies are not currently available at the Districts Council Offices and local libraries due to Covid-19 and will only be available for inspection online at the Council's website.** This is in line with the guidance on reviewing and updating the Council's Statement of Community Involvement (SCI), and new legislation which has now come into force for local development documents (amending, on a temporary basis, regulations 35 and 36 of the Town and Country Planning (Local Planning) (England) Regulations 2012) until 31<sup>st</sup> December 2020. However, if you do require a paper copy of the Consultation paper or response form please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

Please note copies of all comments will be made available for the public to view, including the name of the stakeholder who submitted the representation therefore, your response cannot be treated as confidential. However, the Council will not include any personal addresses or signatures.

**If you wish to comment on the consultation paper, please ensure that your comments are received by the Council by 11.59pm Monday 23<sup>rd</sup> November 2020 otherwise your response may not be considered.**

Please also note, an ongoing Call for Sites process is running alongside this consultation, if you have not been contacted directly further information can be found on the Councils website.

<http://www.southkesteven.gov.uk/index.aspx?articleid=15135>

Yours sincerely,

*Roger Ranson*

Roger Ranson – Head of Planning Policy



The information contained in this e-mail along with any attachments may be confidential, legally privileged or otherwise protected from disclosure. It is intended for the named individual(s) or entity who is/are the only authorised recipient(s). If this message has reached you in error please notify the sender immediately and delete it without review. Email is not secure and may contain viruses. We make every effort to ensure email is sent without viruses, but cannot guarantee this and recommends recipients take appropriate precautions. We may monitor email traffic data and content in accordance with our policies and English law.

For Official Use Only:

REF: SK.IAO.0083

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

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Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name		Michael
Last Name		Thompson
Organisation		
Address		<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 60px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px;"></div>
Postcode		<div style="background-color: black; width: 100px; height: 15px;"></div>
Telephone		<div style="background-color: black; width: 150px; height: 15px;"></div>
Email Address		<div style="background-color: black; width: 300px; height: 15px;"></div>

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 100px; height: 15px;"></div>	23/11/2020

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	X	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	X	No		Unsure	
If not please provide details.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	X	No		Unsure	
If not please provide details.					

7. Proposal 3 – Policies not proposed to be changed significantly					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	X	No		Unsure	
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	X	No		Unsure	
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	X	No		Unsure	
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If not, please provide details of what changes you think should be made.

Yes, provided that in the hamlets deemed to be countryside, there can be a degree of latitude to permit a new house to be built either within the built-up area of the settlement or on the edge, where there is community support. The present proposal is too restrictive for the future viability of the hamlets.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	X	No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

Please see comments at Q.9

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

Please see comments at Q.9

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

Please provide details

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

--

<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?					
Yes	X	No		Unsure	
If not, please provide details.					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?					
Yes	X	No		Unsure	
If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?					
Yes		No	X	Unsure	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes		No	X	Unsure	
Please give details.					

--

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	X	Unsure	
-----	--	----	---	--------	--

Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	X	No		Unsure	
-----	---	----	--	--------	--

Please give details

<p>All noe homes should have off road parking space.</p>
----------------------------------------------------------

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**



For Official Use Only:

REF: SK.IAO.0084

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

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If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Adam	
Last Name	Clink	
Organisation	Mussons Close Residents Group	
Address	██████████ ██████████ ██████████	
Postcode	██████████	
Telephone		
Email Address	████████████████████	

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3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████████████████	22 November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
The Vision should be updated reflect the Government’s renewed commitment on climate change. Can SKDC set itself a recognised target for the District? I believe the Vision could make more of a commitment about SKDC’s aims to go carbon neutral, through actively encourage more use of public transport / electric cars / buses and green infrastructure, perhaps pedestrianise main town high streets (as in Stamford) to make them more attractive places to shop, work and relax. For the post COVID-19 recovery plan, the Vision would be right to highlight the need to promote economic recovery, but it should also address the potentially significant requirement to promote personal well-being and mental health through community initiatives and promoting the renewed and well documented importance of open green spaces. The Vision may also seek to consider the potential impact of an increase in homeworking, which is already seeing a shift in housing need and a potential migration out of bigger cities.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

--

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

--

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?**

Yes	✓	No		Unsure	
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**If not, what evidence do you have to justify an alternative need and requirement?**

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

Yes	✓	No		Unsure	
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**If not, please provide details and any alternative proposals.**

There's a real opportunity to invest in Grantham, given its vital transport links to the North and South. The Governments 'levelling-up' agenda ought to support this too. It would be great to see real tangible development of the town centre that promotes the heritage of Grantham while incorporating modern architecture where appropriate.

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

**If not, please provide details and any alternative proposals.**

Of the three towns, Stamford suffers from terrible traffic congestion, which may be partly down to its success as an attractive shopping and leisure destination. However, growing Stamford's housing supply needs to be very carefully planned and managed in conjunction with managing the traffic flow through the town to avoid any unintended negative consequences.

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

**If not, please provide details and any alternative proposals.**

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

**If not, please provide details and any alternative proposals.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes	✓	No		Unsure	
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**Please provide details**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

**If yes, please provide details.**

**The proposed Gypsy and Traveller site at Cold Harbour (at appeal) seems to be the most sensible and achievable method to meet the immediate demand for sites.**

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

**If not, please provide details.**

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

SKDC could take a more central view of the need to address the national pledge to become carbon neutral, cutting greenhouse gases to net zero in the next 30 years. Getting ahead early will be imperative. It is encouraging to see that the Woodland Trust is again offering free trees for planting, but SKDC should be identifying areas for planting and incorporating green spaces and tree planting in all new developments through S106 arrangements. Preservation and protection of all existing green spaces, including informal and connecting spaces in towns and villages, should be cemented into planning policy.

During the COVID-19 pandemic green spaces have been more vital than ever to our health, both physical and mental. They promote and support community well-being and prevent loneliness and depression. Green spaces face countless threats from developers and a lack of local authority funds to maintain and manage them. Government planning policy seems to be placing further risk. Local authorities have a duty of care to ensure that everyone has good-quality green space within a short and easy walk of home, especially important now with projected population growth. Robust plans and budgets should be incorporated and adopted into the Local Plan to support the acquisition, management and protection of open spaces, to dedicate land as town and village greens and to designate areas of Local Green Space in towns and villages to afford such areas an appropriate degree of planning protection.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	✓
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	✓
-----	--	----	--	--------	---

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

Please give details

--

<b>18. Any other Comments</b>
<b>Q14 – Any other Comments</b>
<b>Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?</b>
n/a

**Part C: Sustainability Appraisal Scoping Report**

<b>19. Comments about the Sustainability Appraisal Scoping Report</b>
n/a

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0085

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

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**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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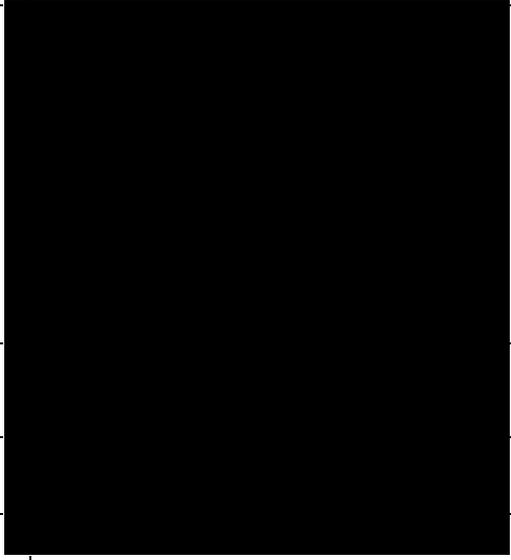
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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Ms
First Name		Angela
Last Name		Smedley
Organisation	Oldrid. & Co. Ltd.	Fisher German LLP
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

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**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23 NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	X	No		Unsure	
If not please provide details.					
Please see separate representations					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No	X	Unsure	
If not please provide details.					
Please see separate representations					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	X	No		Unsure	
If not please provide details.					
Please also see separate representations					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	X	No		Unsure	
If not please provide details.					
Please also see separate representations					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

**Please also see separate representations**

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
------------	----------	-----------	--	---------------	--

**If not, please provide details of what changes you think should be made.**

**Please also see separate representations**

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**N/A**

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If so, please outline any suitable and deliverable proposals.**

**N/A**

**10. Proposal 6 – Housing Need and Requirement****Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

N/A

**11. Proposal 7 – Distribution of Growth****Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

N/A

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

N/A

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

N/A

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

N/A

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please provide details

N/A

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

N/A

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

Please see separate representations

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

Please see separate representations

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

N/A

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

N/A

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

N/A

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

N/A

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	X
-----	--	----	--	--------	---

Please give details

Please also see separate representations

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

N/A

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

N/A

Thank you for responding to this consultation.

# South Kesteven Local Plan Review

Issues and Options  
November 2020

Representations prepared by Fisher German LLP  
on behalf of Oldrid & Co. Ltd



**Project Title:**

Downtown Site, Grantham

**Address:**

Document Author	Version	Date	Approved by	Comments
Angela Smedley MRTPI	A	11/11/2020		

# 01 Introduction

- 1.1 These representations are prepared by Fisher German on behalf of Oldrid & Co. Ltd., and relate to the long-established retail site on land off Occupation Lane, Gonerby Moor, Grantham, known locally as Downtown Grantham/Boundary Mill. Figure 1 illustrates the location of the site.



*Figure 1: Site Location*

- 1.2 The site is owned by Oldrid & Co. Ltd which was founded in 1804 and is a family-owned retail business with five major retail stores trading throughout Lincolnshire. The business has been trading from the site at Occupation Lane, Gonerby Moor for over 30 years. Planning consent was granted for a retail store in 1988 with its subsequent trading commencing in 1989. The garden centre was later granted planning permission in 1999 and commenced trading in 2000.
- 1.3 The retail site comprises a major department store, with a furniture, homewares, clothing and beauty offering, along with an outlet fashion retailer, Boundary Mill Stores. A large garden centre

providing an extensive outdoor offering is also located on the site. The site is a major retail destination for the District with over 700 members of staff employed across the business.

- 1.4 As the Council is aware, the landowner proposes to redevelop the existing retail/outlet site to provide a Designer Outlet Centre (DOC). At the time of writing (November 2020) a planning application (reference: S17/2155) for a Designer Outlet Centre and associated uses is pending approval following a resolution to grant consent.
- 1.5 Comments have not been made to all the policies within the document, only those of most relevance to Oldrid & Co. Ltd.'s interests.

## 02 Representations

### Question 1a – The Vision

**Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details**

- 2.1 We agree that the Vision should be broadly the same for the new plan, including the impetus on the District to have a *“successful, diverse economy providing employment opportunities for the local workforce, equipped with a wide range of skills to meet employer needs”*.
- 2.2 We support Grantham’s role as the Sub-Regional Centre to be strengthened through significant housing and employment growth and to develop employment opportunities to make Grantham an even more successful sub-regional centre, and retail and leisure destination, providing for both the local community and visitors from a wider area.

### Question 1b – The Vision

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District? If not please provide details.**

- 2.3 We consider that the current Vision is sufficient in relation to climate change by including reference to addressing and mitigating any negative effects of development on the built and natural environment.
- 2.4 In relation to COVID-19, the pandemic has had an unprecedented impact on a global scale, including on the UK and South Kesteven District and we will likely be living with the impacts and the reality of the virus for years to come. The planning system has a part to the play in this and has already had to adapt to deal with the crisis, including the way in which planning applications are determined, with a shift towards virtual planning committee meetings, and with some local authorities that shift has also prompted an increase in delegated decision making. New time-limited permitted development rights have also been introduced to enable pubs, restaurants and cafes to operate temporarily as hot food takeaways to enable businesses to continue to operate in some way. The Government also expects local planning authorities to approve requests to extend construction site working hours as well as to act proportionally in responding to suspected

breaches of planning control regarding working hours, using their discretion to not enforce against such breaches.

- 2.5 The Government's 'Changes to the current planning system' consultation seeks to assist further with the economic recovery from the impact of COVID-19. This includes longer and shorter-term measures, including a temporary increase of the small sites threshold below which developers do not need to contribute to affordable housing to 40 or 50 units to support SME builders as the economy recovers.
- 2.6 For Plan-making the Government has encouraged all local planning authorities to continue, as much as possible, to work proactively with their community and other stakeholders to progress plans. Many Local Plan Examinations are successfully being undertaken virtually.
- 2.7 The wide range of fiscal and monetary rescue packages that the Government has introduced, which are designed to help individuals and businesses through this period, have been of great benefit to the economy. However, the economic implications of COVID-19 are still unfolding, and as these packages are withdrawn it is likely to lead to job losses. The Vision should be amended to reference the District's economic recovery, with a focus on job retention, and job creation where possible. Local planning authorities must be responsive to change given the uncertainties being faced. For instance, with more flexible working patterns created by the pandemic, demand for office space is likely to be reduced, especially for some businesses which seek to make operational savings during the recession. In addition, the lockdowns have highlighted the importance of space and social distancing. Planning authorities should recognise and approve developments that offer spacious surroundings, supporting both the local economy as well as our health and well-being.

## Question 2 - Objectives

**Do you agree that the Objectives should remain the same for the new plan? If not please provide details.**

- 2.8 We support the current Objectives to assist in meeting the Vision, with a strong emphasis on the economy and enhancing prosperity.

### Question 3 – Policies not proposed to be changed significantly

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details**

2.9 Future revisions to national policy may impact on a number of the policies referred to in the list, however, in principle, we support the list of policies to be retained, notably Policy E4: Protection of Existing Employment Sites which offers a level of flexibility to employment generating proposals outside of standard B-use classes (now Class E(g) as well as B2/B8) – ever more important following the changing circumstances and economic impact of the COVID-19 crisis.

### Question 4 – Plan Period

**Do you agree with the proposed plan period up to 2041? If not please provide details**

2.10 We agree with the amended Plan Period up to 2041. Given the anticipated adoption for the Local Plan Review in 2024, the Plan Period to 2036 would not sufficiently provide for a minimum 15 year period, as required by the NPPF. An extension of five years would account for this.

### Question 5a – Settlement Hierarchy

**Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.**

2.11 We support retention of the settlement hierarchy (Policy SP2) which focusses the majority of development in Grantham in order to support and strengthen its role as a Sub-Regional Centre, with new development proposals supported on appropriate and deliverable brownfield sites and on sustainable greenfield sites.

### Question 9a – Strategic Employment Allocations

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable? If not, please provide details.**

2.12 We support the retention of allocations set out in Policies E1 and E2. Given such strategic developments can take time to come forward it is not considered that they require review at this stage.

## Question 9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

2.13 We support the preparation of an updated Employment Land Study and review of the smaller employment allocations set out in Policy E3 to ensure that the appropriate level of employment land is provided for within the Plan Review.

## Question 13 – Parking Standards

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

2.14 If the planning authority wishes to introduce parking standards in the District it should do so in line with the NPPF which sets out that *“If setting local parking standards for residential and non-residential development, policies should take into account:*

*a) the accessibility of the development;*

*b) the type, mix and use of development;*

*c) the availability of and opportunities for public transport;*

*d) local car ownership levels; and*

*e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”*

2.15 Maximum standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network.

## Amy Bonfield

---

**From:** [REDACTED]  
**Sent:** 23 November 2020 15:36  
**To:** PLANNING POLICY  
**Subject:** Response from Old Somerby Parish Council  
**Attachments:** 2020-11-23 SKDC Local Plan Review I\_O\_Response\_Form\_v41 (2).docx

**Categories:** Yellow Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Dear Sirs,

The Old Somerby Parish Council fully supports the response and views as contained in the attached Response Form submitted by Nigel Percy of

[REDACTED]. Mr Percy is a Parish Councillor for this Council.

Please regard this email as a separate response from this council in the terms of the above attachment.

David J Holmes  
Parish Clerk  
Old Somerby Parish Council

For Official Use Only:

REF: SK.IAO.0086

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Nigel	
Last Name	Percy	
Organisation		
Address	<div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 80px; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 40px; height: 15px;"></div>	
Postcode	<div style="background-color: black; width: 60px; height: 15px;"></div>	
Telephone	<div style="background-color: black; width: 100px; height: 15px;"></div>	
Email Address	<div style="background-color: black; width: 150px; height: 15px;"></div>	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 100px; height: 15px;"></div>	22 November 2020

**Part B: Issue and Options Consultation Questions**

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

<b>Yes</b>	✓	<b>No</b>		<b>Unsure</b>	
------------	---	-----------	--	---------------	--

**If yes, please provide details.**

The local plan fails to address the needs of the Gypsy and Traveller community on several counts. Firstly, the local plan is able to identify development sites for 19,000 new homes but not one pitch for the Gypsy and Traveller community. Secondly, it makes reference to the Gypsy and Traveller Accommodation Assessment 2016 (GTAA) which identifies the need for 32 pitches and was completed and adopted by the Council without any consultation with the local residents. Finally, the specific lack of provision in the plan for these pitches means that any application in relation to Gypsy and Traveller sites puts the local planning department in a difficult position, in that the criteria in H5 are ignored and planning applications drive the planning policy. That is to say, the need to meet the GTAA recommendations is greater than the quality of the development.

For example, the local plan review ignores the fact that the planning application at Cold Harbour is under appeal. The developers are convinced that they will win the appeal base on hundreds of other appeals over-turned across the country. The statistical likelihood is that it will also occur with this appeal. The Planning Department recommended the original application despite only meeting one of the five criteria set out in H5 in the emerging local plan. The site is at the confluence of the A52 and the High Dike, a small triangular piece of land – in all intents and purposes – a traffic island which has approximately 14,000 vehicles per day encircling it at speeds up to 70 miles per hour. Several applications in nearby Old Somerby have been rejected on the basis that they are not in keeping with the village, however, this is not a consideration adopted by the planning Department for the Cold Harbour application, a very small and isolated hamlet of 7 houses, one of which is Grade II listed.

The secrecy with which the GTAA recommendations have been pushed through highlights the stealth and underhand way in which planning applications like the one at Harrowby Lane have been conducted. The original application was granted for 2 pitches only to be occupied by one family. After period of about a year another application for a day block was made with cooking and washing facilities. During both the application processes no reference to the GTAA was made. Had this been included then it would be clear that the intention always was to expand the site to 6 pitches, opening it up to more families. It, therefore, can be interpreted that, as in the recommendation of the GTAA for Cold Harbour, the development at Cold Harbour will be expanded from 6 to 25 pitches. That would see an increase of the local population of the hamlet by nearly 500%.

In summary, the local plan states in H5:

- a. *the proposed site provides an acceptable living environment for its residents;*
- b. *the site has good access to the highway network and will not cause traffic congestion or safety problems;*

Both of these criteria should have rejected the application at Cold Harbour by the planning officers given its location, but the officers instead recommended it

- c. *the site is in reasonable proximity to shops, schools and health facilities;*

Again, given Cold Harbour’s isolation and rural location there is no reasonable proximity to anything, no public transport not even a footway or street light

*d. the site is not identified as an area at risk of flooding in the Strategic Flood Risk Assessment (SFRA);*

This is the only criteria which the application passes

*e. the scale and layout of the site will respect its relationship with any residential (settled) community and not place undue pressure on the local infrastructure.*

With the GTAA recommendation that the site at Cold Harbour would accommodate 25 pitches (let's say 50 adults and 40-50 children) then this would completely overwhelm the established community of 15 adults and 8 children and would not be in keeping with the settled community. The local plan does not identify any sites, suitable or otherwise. This in turn fails to provide suitable guidance for residents, developers and planning officers alike. The necessity to meet the needs of the GTAA seems to override the local plan and its criteria in respect of Gypsy and Travellers. It is evident that planning applications and developers are driving the planning policy here and that the council has no control, and moreover, the District Councillors cannot demonstrate their responsibility and accountability.

### **Part C: Sustainability Appraisal Scoping Report**

#### **19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0087

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

## South Kesteven District Council Local Plan Review Regulation 18 Issues and Options Consultation Response Form Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020

### **This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

### **How to respond:**

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### **Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

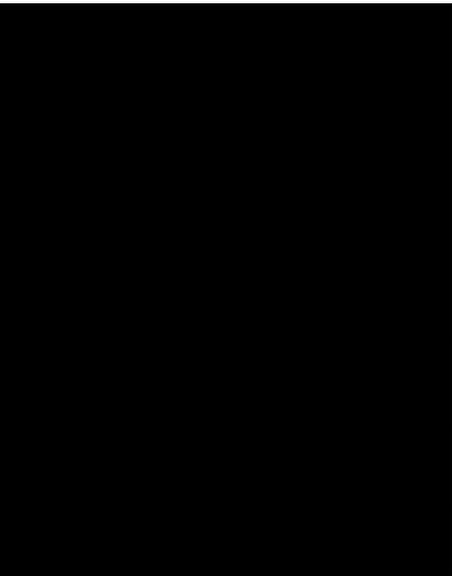
### **The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

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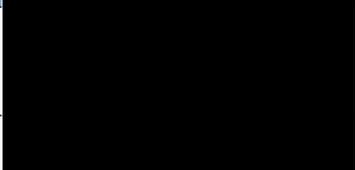
**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Miss
First Name		Jessica
Last Name		Graham
Organisation	The Crown Estate	Savills (UK)Limited
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No	X	Unsure	
If not please provide details.					
We broadly support the proposed vision set out in the Local Plan Review. However, we consider that the vision should be further sub-divided so that ‘Larger Villages’ and ‘Smaller Villages’ are separated and their individual visions for growth are discussed separately. This will ensure that the proposed vision for the Local Plan Review accords with the distribution of growth objectives set out through the rest of the plan.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					
N/A					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	X	No		Unsure	
If not please provide details.					
We support the objectives listed, particularly in regards to Objectives 10 and 11.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No	X	Unsure	
If not please provide details.					
We consider that the Council needs to be flexible in their approach on which policies require updating. Proportionate, relevant and up-to-date evidence should be used to justify a decision not to update policies (Planning Practice Guidance (PPG) Reference 61-068-20190723). The Council has acknowledged in the Local Plan that evidence will be produced to support the Local Plan Review. However, a list of evidence documents they propose to update / produce has not been included in					

the consultation document. Therefore, it is difficult to provide an meaningful response on whether the policies listed in ‘Proposal 3’ should be changed or not. We request that during the next consultation on the Local Plan Review when the evidence base has been updated, the Council should seek views again on whether the policies listed in ‘Proposal 3’ should be updated or not.

In addition to the above, although we support the Council in their decision to progress with this Local Plan Review, the Government have recently published an intention for full planning reform. The Council should continue to monitor this position and review policies where required.

In light of the above, we have reviewed the list of policies in ‘Proposal 3’ and have comments on the following:

- Policy H1 –The Local Plan Review document will be required to allocate additional sites in order to meet the proposed increase in housing need across the plan period. Therefore. Policy H1 will require updating. We discuss this further in our response to Questions 6 and 7 below. Additionally, in the adopted Local Plan no allocations have been made in the Large Village of Billingborough. As one of the most sustainable Larger Villages, we consider that the Local Plan Review should direct growth to this settlement. This is discussed further in our responses to Questions 5 and 7. Additionally, we also consider that small and medium sized sites should be allocate in the Smaller Villages identified in the Settlement Hierarchy. This is discussed further in our response to Question 7d.
- Policy H4 – in order to meet the requirements of this policy to provide appropriate type and sized dwellings to meet the needs of current and future households in Billingborough, the Local Plan Review should allocate sites in this settlement.
- Policy EN2 – we support the retention of this policy. If allocated for residential development, our client’s sites in Billingborough and Pointon could potentially deliver biodiversity net gain either within the site boundaries or on adjacent land also owned by our client.
- Page 126 of the adopted Local Plan should be updated to reflect any allocations proposed within Billingborough. If the Council also choose to allocate any sites within Small Villages these should also be included an updated version of ‘Section 3 - South Kesteven’s Communities’ in the adopted Local Plan.

8. Proposal 4 – Plan Period				
Q4 – Plan Period				
Do you agree with the proposed plan period up to 2041?				
Yes	X	No		Unsure
If not please provide details				
NPPF Paragraph 22 states that “strategic policies should look ahead over a minimum 15 year period”. We therefore support the proposal for the Local Plan Review to cover the plan period up to 2041.				

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

We support the proposed retention of the existing settlement hierarchy in the Local Plan Review document.

Billingborough is currently identified as a Larger Village in the adopted Local Plan. In the ‘Settlement Hierarchy Review’ (2017) that was used to support the adopted Local Plan, Billingborough was the third highest scoring ‘Large Village’ (out of 15 Large Villages) when assessed against the range of services and facilities it offers. However, subsequently no allocations were proposed in Billingborough in the adopted Local Plan but allocations were proposed in less sustainable settlements. As demonstrated in the Settlement Hierarchy Review, Billingborough has a range of services and facilities to support future housing growth. The suitability of Billingborough for residential growth is also identified in the findings of the Local Plan Review Interim Sustainability Appraisal (October 2020). Therefore, for the Local Plan Review to contribute to the achievement of sustainable development (NPPF Paragraph 16) and accord with the Council’s evidence base, housing growth for the next plan period should be directed to the sustainable settlement of Billingborough. Our client has submitted two sites through the Call for Sites process that we consider could be suitable locations for residential development.

In addition to the above, we also support Pointon continuing to be identified as a ‘Small Village’. A ‘Settlement Hierarchy Review Update’ (2019) has been produced by the Council to identify a list of ‘Smaller Villages’. Appendix 1 of the ‘Settlement Hierarchy Review Update’ correctly states that there are more than 30 dwellings within the settlement and there are primary facilities within the village (pub and primary school). We support the methodology and findings proposed in the Review Update that Pointon should be identified as a Small Village.

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

Please see our separate response to Question 5a above - We support the retention of existing settlement hierarchy which correctly identifies Billingborough as a Larger Village and Pointon as a Smaller Village.

### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	X	Unsure	
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If so, please outline any suitable and deliverable proposals.

We consider that there are a sufficient number of sites adjacent to existing settlements that should be considered for development in the first instance before a new settlement is considered. Our client's sites adjacent to the settlement of Billingborough and within the village of Pointon are suitable and sustainable options for growth that would accord with the Council's settlement hierarchy and deliver much needed homes to meet the needs of the local communities.

### 10. Proposal 6 – Housing Need and Requirement

#### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No	X	Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

The provision of new housing is central to supporting economic growth and job creation (NPPF Sections 1 - 6), specifically in terms of: providing an attractive place for the District's economically active population to live; helping to support the vitality and viability of villages such as Billingborough and Pointon through increasing the number of residents and therefore potential customers (NPPF Section 7); providing investment into key strategic infrastructures and creating and sustaining jobs through the construction and servicing of the new dwellings.

The Local Plan Review is currently proposing to deliver 754 dwellings per annum. The minimum requirement when using the current Standard Method is 732 dwellings per annum which is only 22 dwellings per annum less than the Council's proposed requirement. The Government's standard methodology identifies the minimum annual housing need which should be used as a starting point (PPG reference 2a-002-20190220). A housing requirement figure should be established separately and other factors, including ambitions to support economic growth or deliver affordable housing should be considered by the Council (PPG reference 2a-001-20190220). The NPPF (paragraph 59) and PPG (Reference 2a-010-20190220) set out the Government's objective of significantly boosting the supply of homes. The Prime Minister has also recently noted the importance of building new homes in both his 'Build, Build, Build' speech (June 2020) and in the foreword of the 'White Paper – Planning for the Future' consultation document (August 2020). In light of this, we do not consider that a housing requirement figure of just 22 dwellings per annum more than the minimum housing need is aspirational (NPPF Paragraph 16) and we therefore consider the housing requirement figure should be increased.

The housing need figure should be calculated at the start of the plan-making process. However, this number should be kept under review until the Local Plan Review document is submitted for Examination (PPG reference 2a-008-20190220). This is particularly important for South Kesteven

district as at the same time as consulting on the ‘White Paper – Planning for the Future’ document, the Government has also confirmed its intention to review the standard methodology. Using the Government’s revised standard methodology that was published for consultation, the minimum housing need figure for South Kesteven could increase by 15% to 839 dwellings per annum. This could equate to a total housing requirement of 3,200 more dwellings than the adopted housing requirement figure between now and 2041. We consider that the Council should plan for this additional growth by considering the two obvious scenarios that may emerge from the Standard Method calculations. The first option that the Council should consider is the current Standard Method figure with an annual housing need of 732 dwellings. The second option that the Council should consider is the revised Standard Method which could see the annual housing need increasing to 839 dwellings. Both are likely to require different approaches which will take several months to assess and by the time this work is complete there should be clarity from Government on which method should be applied.

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

N/A

**Q7b – Stamford, Bourne and The Deepings**

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

N/A

**Q7c – Larger Villages**

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

As stated in our response to Question 5, we support the retention of the adopted Settlement Hierarchy which identifies Billingborough as a Large Village. The adopted Local Plan identifies that the Large Villages could cumulatively accommodate circa 10% of the total housing requirement. The table on page 16 of the Local Plan Review document states that currently there are 1,375

dwellings committed in Large Villages which, based on the proposed 754 dwellings per annum need, means that circa 61 - 443 dwellings would need to be identified in the Local Plan Review. We consider that these dwellings should be directed to the Larger Villages, such as Billingborough, which have not been the subject of any housing allocations in the adopted Local Plan but are sustainable and appropriate locations for housing and have the existing services and facilities to accommodate additional housing development.

Additionally, as we have stated in our response to Question 6, we consider that the housing need figure should be increased in South Kesteven to allow for a more aspirational housing requirement figure as well as the increase that could be imposed if the Government pursue their revised Standard Method algorithm. Even before the Government confirm their position, the Council could assess their housing need based on both Standard Method options. We consider that if additional dwellings need to be identified, these should be dispersed across the settlements and the Larger Villages could accommodate more than 10% of the proposed requirement. We have submitted two sites in Billingborough for assessment for residential development.

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

The PPG requires that local planning authorities should have a clear understanding of the housing needs in their area (PPG Reference 61-039-20190315), this should include identifying opportunities in planning policies for villages to grow and thrive (NPPF Paragraph 78). In light of this, we consider that the Local Plan Review should include allocations for smaller sites across the Small Villages, such as Pointon, which are set out in the adopted Local Plan and the table on page 12 of the Local Plan Review. Paragraph 68 of the NPPF states that small and medium sized sites can make an important contribution to the housing requirement of an area and are often built-out relatively quickly. Paragraph 68 also states that to promote a good mix of sites, Local Plans should identify land for at least 10% of their housing requirement on sites no larger than 1 hectare. Allocating suitable sites within small villages will also provide landowners / promoters / developers with more certainty as it will assist in reducing risks associated with submitting rogue planning applications on unallocated sites.

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
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**Please provide details**

The Council’s strategy should consider the spatial distribution of housing across the District and be mindful where too many houses may lead to a slow or lack of delivery. However by trying to be overly scientific or prescriptive in the distribution of houses would also be complicated by a range of external influences prevailing at that time, including the global, national and regional economic situation, planning permissions in the vicinity and how the local housing market is performing at the point a decision on the growth strategy is taken.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

N/A

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

N/A

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

N/A

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

N/A

## 15. Proposal 11 – Energy Performance Standards

### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No	X (See response to Q11c)	Unsure	
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### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
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Please give details.

N/A

### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

The viability of individual developments and plan policies should be tested at the plan making stage. The PPG states that “*viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan*” (PPG Reference 10-002-20190509). Paragraph 34 of the NPPF states that Local Plans should set out contributions expected from development but these “*policies should not undermine the deliverability of the plan*”. At this stage in the Local Plan Review process when policies have not been drafted / finalised in regards to affordable housing or infrastructure provision, it is difficult to confirm whether or not requiring higher energy performance standards will undermine the deliverability of the Local Plan Review document. When considering the introduction of policies that seek to deliver higher energy performance standards, the Council should obtain appropriate evidence which demonstrates how much these new standards will cost (in terms of the additional £/sqft) over and above the standard build costs. In our experience, developers are keen to raise their standards and reduce their carbon footprint. However, this cannot be at any costs and therefore the question raised above regarding viability will very much be influenced by the additional cost any higher energy performance policy requirements are compared to the prevailing built costs (e.g. BCIS).

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

N/A

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
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Please give details

N/A

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

N/A

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Billingborough**

Table 4.3 of the Sustainability Appraisal (SA) sets out the appraisal of options for growth in the Larger Villages. We have reviewed the table in relation to our client’s land interests in Billingborough and have provided commentary below.

- Biodiversity and Geodiversity – no features of biodiversity interest within Billingborough are identified in the SA. We therefore consider that any development in Billingborough unlikely to have an adverse impact on nationally important biodiversity assets.

- Landscape – Billingborough is not identified as a settlement with a Landscape Character Area that has medium – high sensitivity to new residential development. We therefore consider that development in Billingborough should not have an adverse impact on a Landscape Character Area.
- Historic Environment – Billingborough has approximately 15 listed buildings and a conservation area. The SA states that whilst the significance of the effects from each option on cultural, built and archaeological heritage assets depends on the location, scale and nature of development. Our client’s sites are not within the Conservation Area nor are there any listed buildings within or adjacent to the sites. We therefore consider that the development of either or both of our client’s sites should not impact on the historic environment of the settlement.
- Water Resources – Billingborough features include a network of drainage ditches surrounding the settlement and is underlain by a groundwater Source Protection Zones. The SA goes on to state that whilst the significance of the effects from each option on water resources and quality largely depends on the location, scale and nature of development and the incorporation of mitigation measures (e.g. SUDs), it can be considered that renewing and increasing the focus of development within Larger Villages will increase the likelihood (and potential magnitude) of negative effects on both surface water and groundwater resources. This is linked to increased levels of surface water runoff, increased suspended sediment loading and discharge of polluted runoff. Although this is noted, we consider that mitigation could be provided as part of any development within Billingborough to limit the impact on water resources within the settlement.
- Air Quality – Billingborough is not within a designated Air Quality Management Area. The SA does note that cumulatively development across the Larger Villages has the potential to increase road traffic. No other development is proposed within Billingborough in the adopted Local Plan so the cumulative impact within the village itself is limited and any development of our client’s land could utilise effective mitigation measures to promote the use of sustainable transport modes and limit the impact of the development on Air Quality.
- Land Quality – The SA states that 12 out of the 15 Larger Villages contain areas of Grade 1 or 2 agricultural land. Our client’s sites fall within Grade 2 and Grade 3 agricultural land. This matter can be investigated further at planning application stage where evidence can be provided to justify the loss of agricultural land.
- Climate Change – Billingborough is identified as a settlement with high flood risk areas. The SA states that development should be guided away from areas of high flood risk. Our client’s land is located within one of the few locations around Billingborough where flood risk should not present an insurmountable problem to the delivery of housing.
- Population and Community – the SA states that the Larger Villages are less well served by local amenities and sustainable modes of transport when compared to Grantham and the Market Towns. However, a renewed and increased focus of growth within the Larger Villages has the potential to support the provision of additional services and facilities which will support community vitality. The SA also states that limited growth in the Larger Villages has the potential to undermine the vitality and viability of these settlements. We agree with the SA’s conclusions and consider that the Larger Villages can support more growth than set out in the adopted Local Plan, especially Billingborough which has not allocations in the adopted Local Plan. Housing growth should be directed to Billingborough on sustainable sites, such as our client’s land, in order to ensure its vitality and viability across the next plan period.
- Health and Wellbeing – The SA sets out that an increase in population in the Larger Villages has the potential to support the viability of local leisure, recreational and health services in these settlements. Whilst the SA highlights that “in certain settlements an increase in population may place increasing pressures on existing (limited) services without an

improvement in the capacity of such amenities”, we see this as an opportunity to secure fresh investment in these locations. Where capacity exists to extend existing services and facilities then this could be a positive and welcome opportunity to provide new investment in existing settlements such as Billingborough.

- Transport – The SA states that there is a relative lack of public transport provision serving Larger Villages when compared to the four larger settlements in the District which has the potential to result in a greater reliance on private vehicles for accessing local services and facilities. However, the SA goes on to state that an increased level of growth in the Larger Villages has the potential to contribute to an enhancement in services and facilities in these settlements. We support this statement and consider that development in settlements like Billingborough could improve public transport provision.

In light of the above, we consider that Billingborough is one of the better performing and sustainable Large Villages within the District. We therefore consider that housing growth should be directed to this settlement, particularly where sustainable and appropriate sites have been identified such as our client’s land. Where infrastructure and community facilities and services need to be improved, then these can be the subject appropriate levels of S106 contribution.

### **Pointon**

Table 4.4 of the SA sets out the appraisal of options for growth in the Smaller Villages. We have reviewed the table in relation to our client’s land interests in Pointon and have provided commentary below. The SA has identified that the most suitable option for growth in Smaller Villages is to continue to not seek to allocate sites in Smaller Villages.

- Biodiversity and Geodiversity - the facilitation of an additional level of growth in the District’s Smaller Villages has increased potential to lead to impacts on habitats, species and ecological networks in the vicinities of these settlements. Due to site allocations in these locations being unlikely to comprise major development of a larger scale, there is also less potential for significant green infrastructure or biodiversity net gain provision to be incorporated with new development areas. The SA considers that this would be likely to limit opportunities for facilitating biodiversity enhancements through new development sites in these locations. We do not support this conclusion. We consider that if site’s are identified and allocated within the small villages, it provides the Council with an opportunity to proactively plan for potential biodiversity improvements rather than having to reactively produce solutions for windfall development. Where biodiversity enhancements are required, a cumulative solution could be identified by the Council which enables proposed allocations to make contributions in terms of units needed to mitigate each development.
- Landscape - Given their smaller size, the SA states that an inappropriate scale of development is likely to have a disproportionate effect on landscape character in the vicinity of Smaller Villages. Allocating sites in Smaller Villages has increased potential to lead to additional effects on landscape character and a sense of place. Through facilitating small-scale and piecemeal development through windfalls, the SA considers it will do more to reflect local sensitivities in terms of landscape character. We do not propose that the Council allocate any major sites within Smaller Villages, however, allocating small to medium scale sites within Smaller Villages, such as Pointon, could assist in providing more certainty for landowners / developers / promoters as well as allowing the Local Plan Review to specifically address the needs of rural communities. Our client’s site in Pointon is 0.76ha and within the settlement. We consider that this site would be suitable for an allocation in the Local Plan Review and will accord with the requirements of Paragraph 68 of the NPPF

so Local Plan's to identify at least 10% of their housing requirement on sites no larger than 1ha.

- Historic Environment – there are limited heritage assets within Pointon (two listed buildings). We therefore consider that development of our client's land should not have an adverse impact on the historic environment.
- Air, Land, Water and Soil Resources – the SA states that an additional level of development in the District's Smaller Villages has the potential to increase the use of the private car. The SA goes on to state that whilst the significance of the effects from each option on water quality largely depends on the location, scale and nature of development and the incorporation of mitigation measures (e.g. SuDS), it can be considered that a higher level of housing development within a settlement increases the likelihood (and potential magnitude) of negative effects on both surface water and groundwater resources. Although we do not dispute these findings, if the Council were to allocate sites in Smaller Villages within their Local Plan, it would enable the Council to plan for the effects of development and address them at the plan-making stage rather than during determination in a piecemeal process.
- Climate Change – the SA correctly notes that the NPPF guides development away from flood risk areas (Paragraph 157). Pointon is within Flood Zone 1 for fluvial flooding and therefore any development proposed in this settlement should not increase the likelihood of flooding elsewhere (NPPF Paragraph 155).
- Population and Community, Health and Wellbeing and Transport – We do not dispute the SA's findings that the Small Villages provide less services and facilities than Grantham, the Main Towns and Larger Villages. However, by allocating sites within smaller villages it provides the Council and Local Communities the opportunity to plan for infrastructure improvements and identify sites to potentially fund these improvements if possible.
- Economic Vitality – we support the findings of the SA that an additional level of growth at the Smaller Villages has the potential to help meet locally specific housing needs, including for those engaged in rural activities, including agriculture, forestry or tourism. This may support the vitality of the rural economy.

In light of the above, we consider that the Local Plan Review should allocate sites within Small Villages, such as Pointon, in order to plan for the needs of rural communities and bring forward more comprehensive development to address the needs of the communities.

### **Biodiversity Net Gain**

The SA has assessed two options for delivering Biodiversity Net Gain (BNG) in the Local Plan Review:

- Option NG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for BNG on major development sites.
- Option NG2: Seek to deliver at least a 20% measurable BNG on major development sites.

Table 4.6 has concluded that the most preferable option is Option NG2 for major development sites to deliver at least 20% BNG. If this is pursued in the Local Plan Review, then evidence should be provided to fully justify why the Council is requesting more than the proposed national requirement of 10% BNG. As we have set out against our response to Question 11c, the Council will also need to assess this requirement against the other policy requirements and potential financial obligations to ensure that *"the total cumulative cost of all relevant policies will not undermine deliverability of the plan"* (PPG Reference 10-002-20190509). As set out above, where sites are proposed to be allocated we consider it is the duty of the Council to ensure that the delivery of BNG requirements can be flexibly applied. This means identifying one or more BNG donor sites which would enable

developers of the allocated sites to make an appropriate contribution to the BNG donor site where the 10% BNG uplift cannot easily be achieved on site.

**Thank you for responding to this consultation.**

19 November 2020  
201116 Issues and Options - Representations Harrowby Lane



Planning Policy  
South Kesteven District Council  
Council Offices  
St Peters Hill  
Grantham  
Lincolnshire  
NG31 6PZ

Maria Boyce

### By Email Only

Dear Sir/Madam,

#### **Land to the North of Harrowby Lane** **South Kesteven District Council Local Plan Review (2041) Issues and Options Document**

This letter is sent in response to the South Kesteven District Council Local Plan Review- Issues and Options Consultation. Savills (UK) Ltd have been commissioned by Absolute Property Development Ltd to make representations to the Issues and Options Consultation in relation to their land interests at Harrowby Lane, Grantham.

The submission and comments made outline that the land north of Harrowby Lane is a deliverable and developable site to accommodate a sensitive residential development in line with National and Local Policy.

We understand the Issues and Options Consultation is being undertaken in line with Adopted Local Plan Policy M1 which requires the review of the Plan prior to 2023, as well as the inspectors recommendation. Given the evolving housing land supply position in South Kesteven, we are fully supportive of this Local Plan review which is required to bring the Local Plan in line with the Governments aspirations to deliver 300,000 dwellings per annum.

Specific commentary has been provided below in response to the questions of relevance outlined within the Issues and Options Document.

A Vision Document has been prepared for the site which outlines 2 options for the development of the land (both of which are to be assessed separately) for:

- Option 1: 50 dwellings
- Option 2: 25 dwellings

The Document and Plans demonstrate the full technical evidence base required to demonstrate the site's deliverability (0-5 years) and therefore as a site that can make a meaningful contribution to the district's housing land supply in the short term.



## **Commentary on the Issues and Options Document**

### **QUESTION 1 Objectives**

#### **Do you agree that the Objectives should remain the same for the new plan? If not then please provide details**

We support the objectives of the adopted Local Plan and suggest these remain for the Local Plan Review. We particularly support objective 6 which seeks to enhance the role of Grantham as an important Sub-Regional centre by ensuring the town is the main focus for new housing, employment and other facilities.

**Recommendation One:** Retain the Objectives outlined within the adopted Local Plan through the Local Plan Review to 2041.

### ***QUESTION 3- Policies not proposed to be changed significantly***

#### ***Q4- Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.***

Proposal 3 outlines the policies not proposed to be changed significantly through the Local Plan review. Policy SP4 'Development on the Edge of Settlements' is included in the list of policies to be retained through the Local Plan. We do not consider that this approach aligns with the NPPF, particularly with regard to the need to take a more pragmatic view of windfall sites, as outlined in the Housing Delivery Test Action Plan (2019, updated 2020).

The policy is overly restrictive with regards to gaining 'substantial community support' for proposals and Local Plan Policy SP4 must be reviewed in order to ensure further flexibility in the way that the policy is applied, particularly on the edge of Grantham, as the District's major settlement.

An overriding aim outlined within the National Planning Policy Framework (NPPF), is to ensure that Plans are 'prepared with the objective of contributing to the achievement of sustainable development', and are prepared in a way that is 'aspirational but deliverable'. This approach is supported through Paragraph 11 of the NPPF:

*'Plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexible to adapt to rapid change'*

Incorporating flexibility also ensures that development will be market led and any deliverability issues with allocated sites (which results in fewer or no development being brought forward) can be compensated for on sites elsewhere, ensuring development still meets the identified need of the settlement.

**Recommendation Two:** Review Local Plan Policy SP4 to ensure sufficient flexibility for edge of settlement sites to come forward.

### ***QUESTION 5a- Settlement Hierarchy***

#### ***Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not please provide details of what changes you think should be made.***

We agree that the Settlement Hierarchy outlined within the adopted Local Plan should be retained through the Local Plan Review. The distribution of dwellings across the District at a level proportionate to the level of shops and services in each settlement.

Whilst we support the key issues and opportunities outlined within the Issues and Options consultation document regarding providing support to a diverse local economy and thriving Town Centres, we feel it will be particularly important to ensure that the direction of future growth is well located in recognition of the significant positive impact residential development can have in supporting the sustainability and vitality of existing Market Towns.

National Planning Policy Guidance shows support for this approach, stating that:

*‘Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services’.*

Proposal 1 as outlined within the Issues and Options document, seeks to strengthen the role of Grantham as a Sub-regional Centre through significant housing growth. The aim outlined within the consultation document is for Grantham to provide for both the local community and visitors from a wider area.

We support this objective and encourage the council to continue directing significant growth to Grantham to achieve this aim.

**Recommendation Two:** Support the vitality of the existing shops and services in Grantham by allocating sufficient suitable sites for residential development in and around the Market Town, particularly on accessible sites within easy walking distances to services and amenities.

**QUESTION 6 – Housing Need and Requirement**

***Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?***

This Local Plan review is being undertaken, in part, due to the adopted housing target of 650 dwellings per annum being based upon out of date assessments of housing need and the introduction of the Standard Method for calculating housing need in 2018, which has increased the housing requirement of South Kesteven to 732 dwellings per annum. The NPPF expects strategic policy making authorities to follow the standard method for calculating local housing need.

Changes to the standard method for assessing local housing need were released through the ‘Changes to the Current Planning System’ consultation in 2020. These changes use the most recent data and seek to achieve a better distribution of homes according to need and support the Governments ambition to support 300,000 homes a year. Figures referred to as ‘Standard Method 2’ were the result of these amendments.

Utilising the calculations within Standard Method 2, South Kesteven are required to deliver a minimum of 839 dwellings per annum. Whilst Standard Method 2 is currently in consultation stage, we believe this demonstrates a clear direction of travel, with the identified housing requirement of the District likely to increase. This should be considered and planned for at this early stage of the Local Plan review to ensure robustness.

Given the early stage of this review, South Kesteven should seek to ensure that their process is robust to avoid an early review. We strongly believe that the housing need for the District should therefore be increased to 839 dwellings as a minimum.

The NPPF requires Local Planning Authorities to be aspirational in their plan making. NPPG is clear that the Standard Method identifies a minimum housing need figure. In combination with the 2019 Housing Delivery Test result, which outlined a historic under-delivery in South Kesteven and subsequently recommended a buffer be applied to the housing requirement of the district, the Local Planning Authority must take this opportunity to plan positively and ambitiously with the aim of meeting the housing requirement of the district as a minimum and making up for historic under-delivery.

**Recommendation Four:** Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.

***QUESTION 7a – Focus of Housing Growth on Grantham Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals.***

Whilst we are supportive of the distribution of growth to all levels of the hierarchy across South Kesteven, we agree that the focus of growth (50-55%) in the district should be Grantham.

As previously outlined, Grantham is home to a number of shops and services as such, any growth in this area of the district would benefit from easy access to a range of services and minimise the requirement of future residents to travel.

In addition, Paragraph 68 of the NPPF recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area. This is considered to be particularly relevant in the short term, as such small and medium sites can often be developed and delivered relatively quickly. In recognition of this important contribution, the site is considered to be particularly appropriate for accommodating levels of growth in line with the spatial strategy.

Finally, given the historic under-delivery in the District, which has been highlighted by the Housing Delivery Test, South Kesteven have created an Action Plan to promote development through the District. One action within the Action Plan is to take a more pragmatic and positive view with respect to applications on windfall sites within Grantham and the wider district. This suggests that the reliance on windfall sites has been ineffective previously. Therefore growth in these locations should be planned for decisively through the use of positive planning policies and appropriate allocations such this site.

The land north of Harrowby Lane presents a clear opportunity to deliver sustainable development in Grantham, supporting local services and contributing to the vitality of the market town. The Vision Document outlines the technical evidence to support its allocation.

**Recommendation Five:** Continue to direct much of the Districts required growth to Grantham.

**Recommendation Six:** Allocate the Land to the North of Harrowby Lane.

***QUESTION 7e – Consideration of the Market and Deliverability\* Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?***

Yes – this is an extremely important consideration, not least because the alternative approaches for South Kesteven have not worked. Given the historic under-delivery in the District, which has been highlighted by the Housing Delivery Test, South Kesteven’s Action Plan specifically highlights the issues with the current allocations in terms of deliverability. The Action Plan champions a more proactive, pragmatic and positive view with respect to applications on windfall sites within Grantham and the wider district. Therefore growth in such appropriate locations should be planned for decisively through the use of positive planning policies and appropriate allocations such this site.

**Recommendation Seven:** Allocate the Land at Harrowby Lane to as a deliverable short term site, with market interest and funding for a revised application to be submitted immediately.

**Land to the North of Harrowby Lane**

These representations have been submitted with specific consideration to land to the North of Harrowby Lane. The development represents a sustainably located development on the edge of a defined built edge to Grantham providing a mix of housing and choice and the potential to contribute to a range of developer contributions including affordable housing, education and health contributions.

The site has the following benefits:

- Outside of settlement limits, the site at Harrowby Lane is undoubtedly one of the most sustainable locations for development within Grantham. There are a range of existing facilities, including Belmont Community Primary School, Harrowby C of E Infants School, Harrowby Lane Doctors Surgery,

Harrowby Lane Methodist Church, Tesco Express, local shops and takeaways, children's equipped play area and hard courts for football within walking distance of the site. The services already serve the immediate neighbouring areas and will be available to the proposed development when it is completed.

- The development will have a strong identity and sense of place that reflects its urban fringe location. New development, together with existing homes and facilities will add to the well served neighbourhood, with new green infrastructure, incorporating and building upon the existing ecology, will provide coherent connections and an attractive, well managed landscape setting for the new homes whilst providing opportunity for active leisure and play in a natural environment.
- The illustrative masterplan options set the framework and guidelines for a high quality design and architectural response for a future planning application.
- The site provides significant accessible new green infrastructure, incorporating and building upon the existing ecology to provide a net biodiversity gain across the site.
- The scheme will also facilitate wider connections and access to the countryside and recreational amenity areas such as Alma Woods Extensive consultation has been undertaken with the Woodland Trust, who are promoting their own woodland initiatives as part of Heritage Lottery Funding received. The proposals would help increase public access to these proposals and would provide a continuation of the woodland experience through the site, proving better connections to other recreation areas such as the Hills and Hollows. The NPPF (2019) states at para 200 that *"Local planning authorities should look for opportunities for new development....within the setting of heritage assets, to enhance or better reveal their significance"*.
- The scheme provides a robust drainage solution through use of sustainable urban drainage and would lead to a betterment of the pre-existing groundwater issues by rectifying existing water run off through the provision of a comprehensive drainage system.

Given the very limited impact of the development, the revised proposals for the site demonstrate it a clear contender for residential allocation which in tandem will deliver many public benefits.

We would be delighted to discuss proposals for the site with you in more detail.

Yours sincerely



**Maria Boyce MRTPI**  
Director

# Harrowby Lane

Vision Document for a deliverable, sensitive extension to Harrowby





# Harrowby Lane

The vision for Harrowby Lane is set out as a series of design principles that together establish a high quality extension to the Harrowby neighbourhood of Grantham.

The proposals will help create an improved urban edge to the town and deliver between 20-50 new family homes in line with the housing needs of the area.

## LEGEND

- Public Space
- Private Gardens
- Water Retention
- Roadways
- Shared Access
- Shared Road
- Decking

# Vision

The Local Plan Review for South Kesteven provides an ideal opportunity to consider new sites for growth within the District. Major growth continues to be promoted within Grantham as a key economic centre not only within Lincolnshire, but sub regionally.

As highlighted in the recent Inspector's Report, a range of sites will clearly be required to deliver this growth through a combination of town centre sites, the major urban extensions and sustainably placed urban fringe locations.

Harrowby Lane has a long planning history and as such a wealth of information is available to support its development. This Vision Document outlines two proposals for the smaller and medium scale development of the site. Both options have been carefully designed within the existing contours of the land to ensure that landscape impact is minimal. The land at Harrowby Lane offers many benefits, including:

## **A sustainable location**

The neighbourhood will be well connected by bus to Grantham town centre and the wider public transport network to further reduce dependence on the private car.

## **New homes with a strong identity**

Harrowby Lane will have a strong identity and sense of place that reflects its urban fringe location. New development, together with existing homes and facilities will add to the well serviced neighbourhood.

## **Landscape led design**

New green infrastructure, incorporating and building upon the existing ecology, will provide coherent connections & form an attractive, well managed landscape setting for the new homes whilst providing opportunity for active leisure & play in a natural environment.

## **Connections and Access to Local Area and Wider Countryside**

The existing network of footpaths, cycleways & roads will provide convenient connections to Alma Wood, local education & play facilities including nearby shops.



# Content

## Introduction

This document has been prepared to support the allocation of land at Harrowby Lane for the development of approximately 25-50 dwellings on the eastern edge of Grantham.

The document has been prepared the following team of consultants:

- » Savills (UK) Ltd – Planning and Heritage
- » ArkleBoyce Architects - Architecture, Masterplanning and Urban Design
- » Urban Wilderness – Landscape Architecture
- » Curtins – Transport, Access, Drainage and Ground Conditions

From analysis and evaluation of the land it is evident that the site has the potential to create a deliverable, developable and sustainable scheme.

## Purpose

The purpose of this document is to consider the capacity and technical ability to deliver growth at the land at Harrowby Lane, on the eastern edge of Grantham ('the site') and evidence how sustainable development could be delivered, taking into account the most recent appeal decision for the site.

The Vision Document considers how development on the site could come forward in line with the growth aspirations of South Kesteven. The document considers:

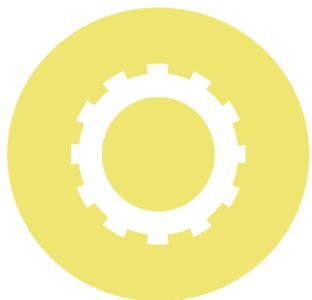
- » The site, its setting, placing it in the wider setting of Grantham
- » The technical challenges of delivering development on site, including landscape and visual impacts, heritage impact, topography, drainage, highways and ground conditions.
- » A vision and concept framework for sustainable development for the site.

## Background

Grantham is the main focus for growth within the area over the next 20 years as the key economic centre within the District. Given the level of growth required within and around the town the nature of the urban area and surroundings will change dramatically over the next 20 years. A range of housing sites of varying scales are required to achieve the growth and ensure that there is adequate and unconstrained land for development available to the market.

This document has been produced as part of the SKDC Call for Sites consultation and follows from a planning application and subsequent appeal made on the land.

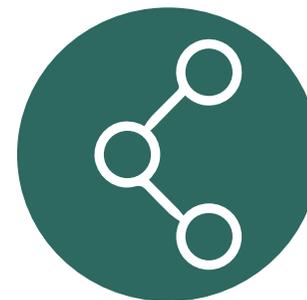
The issues raised by the appeal have been thoroughly assessed and through the technical analysis a reduced scheme has been prepared addressing the landscape and heritage issues in full and the resulting revised scheme is submitted for consideration.



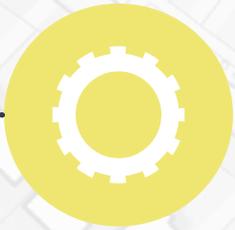
SITE  
CONTEXT



PRINCIPLE OF  
DEVELOPMENT



A SENSITIVE EDGE TO  
HARROWBY



SITE CONTEXT

# Location

The site is positioned on the eastern edge of Grantham on Harrowby Lane. The site abuts existing development in the form of 1970's sub-urban housing which is low to medium density. This housing is characterised by the significant green spaces and generous proportions given to the primary (loop) roads running through the site.

This is partly due to the change in level experienced by some of the housing, although the layout of the development is similar in areas where the topography is much flatter.

The site itself is greenfield and is currently used to graze livestock. The land is enclosed by established hawthorn hedging and self-seeded, semi-mature, ash and field maple along the Harrowby Lane boundary. The remaining boundaries are comprised of fragmented and overgrown sections of hawthorn, punctuated by occasional over-mature ash.

The land slopes from west to east and forms the lower to middle part of the ridge which runs to the east of Grantham. The site boundary however falls short of the ridge, and provides views across Grantham in a north-westerly direction. The site forms a generally consistent slope with the exception of a central area which projects slightly to form a 'headland'.

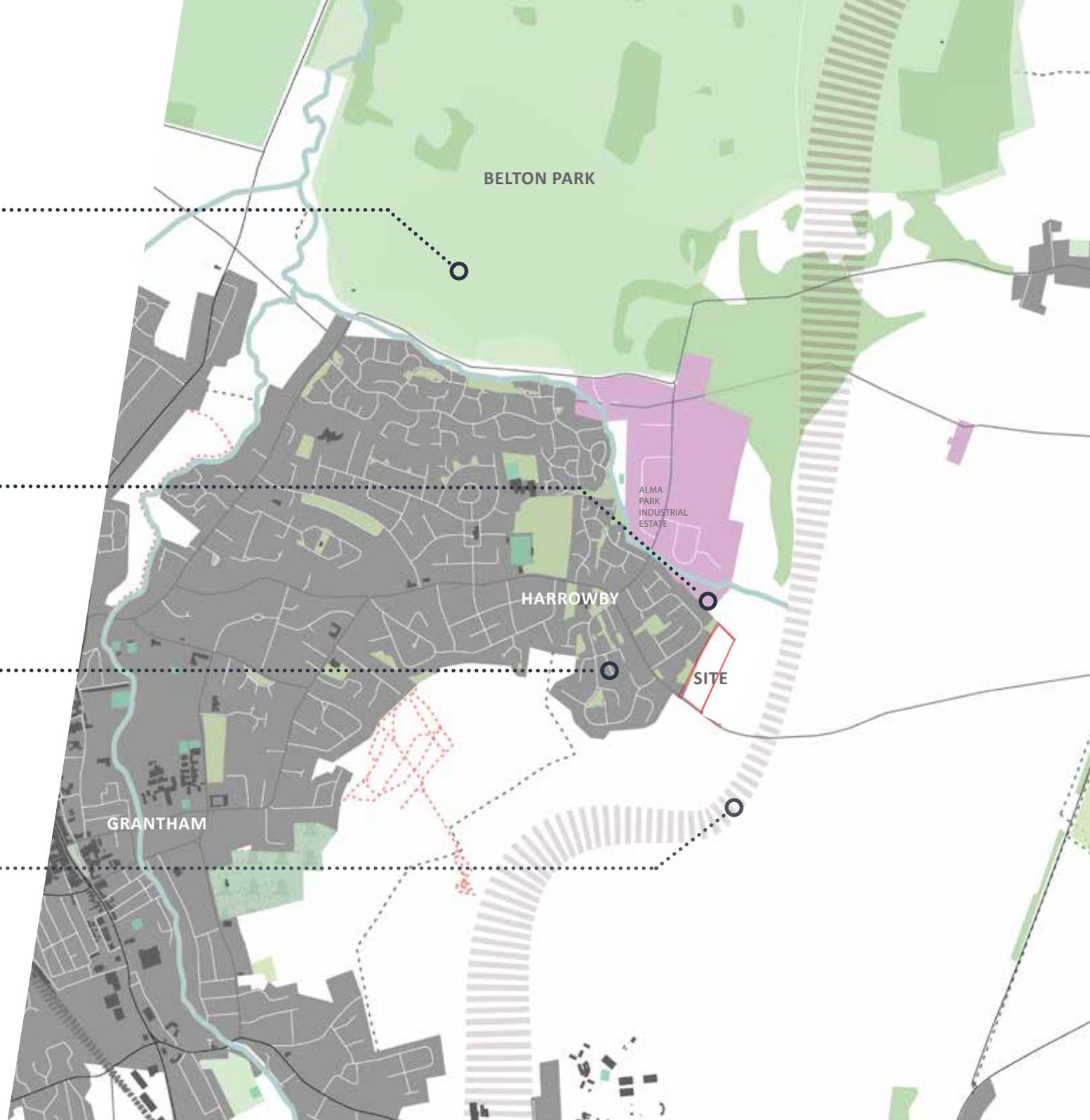
Site access can be obtained from three main points and there appears to have been gaps left within the adjoining 1970's housing development for the potential development of this site.

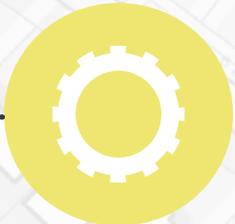
The local character along Harrowby Lane to the East is 1970s, 80s and 90s small to medium sized dwellings, offering medium to high density housing estates set on large loop roads and cul-de-sacs. The houses are located set within small to medium sized plots with generally small front and larger rear gardens. These dwellings are mainly two storey houses, interspersed with some bungalows.

Belton Park Golf Club is located c.1.5km from site and forms part of the Belton Park English Heritage Registered Park and Garden and which contains the Grade I listed Belton House.

To the North of the site sits a narrow strip of industrial buildings, Alma Park Industrial Estate.

The area around the site is on steadily rising land which plateaus around Canberra Crescent. The land then rises steeply to the East and South to form a ridge, covered by a mixture of open arable land and woodland.





SITE CONTEXT

# Local Character

The site is currently being used as pasture for grazing animals. Immediately to the west, the site predominately backs onto housing along Fifth Avenue with areas used for an informal children’s play area and a managed green embankment.

## Local Vernacular

In terms of the use of materials there is wide variation across the area, however, almost all would be generally considered as traditionally built; brick and tile. Brick is the predominant walling material throughout. There are many different colours, textures and finishes, from red, orange and buff bricks. Immediately to the west of the site along Ninth Avenue the houses are constructed from buff bricks with painted horizontal timber cladding.

Roofs are a mix of clay tile, either traditional plain tiles but mostly machine cut plain, or concrete interlocking tiles. There is the occasional use of modern pantile. Some natural slate survives to the older houses.

## Parks and Recreation

There is good provision of public open space throughout the area with a combination of pockets parks and green ways forming an integral part of new developments and aligned with a retained historic field boundaries and tree belts. The new development provides the opportunity to improve the access and surveillance to these spaces. There are large recreation and sports fields linked to schools, often with full public or semi-public access and connected by public rights of way.

## Trees and Hedges

There are only a few trees located within the site, with the highest concentration found along the boundaries to the north and south.

To the west, beyond the site boundary, there is a small informal managed green embankment with some mature ash and oak trees and overgrown hawthorn hedgerows. The site’s boundary comprises mainly hawthorn and bramble hedgerows, the vast majority of which are proposed to be retained and enhanced where appropriate.

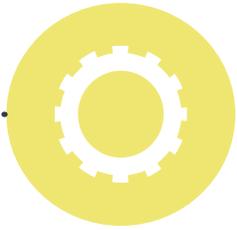
## Landscape Character

Landscape character is defined by the ridge which serves to enclose the urban realm and provides a sense of visual containment. Alma Wood provides woodland cover along the ridge north of site. Other dispersed field boundary trees and hedges form a verdant approach to the town from the south and provide a green backdrop to Grantham when viewed from the opposite side of the valley.

View from site looking down Fifth Avenue and one of the existing small recreational areas







SITE CONTEXT

# Technical Analysis

As part of the masterplanning process a range of technical issues have been reviewed to inform the design solution and quantum of development that is achievable on the site.

## Highways and Movement

There are no public rights of way through the site, however there is an existing right of way adjacent to the boundary to the north, accessed through the children's play area on the corner of Fifth Avenue.

Vehicular movement is along the primary highway towards High Dike and Grantham Town Centre with secondary routes feeding residential estates. Pedestrian and cycle routes are only provided via the adopted footways.

## Access

Site access can be obtained from three main points. At two locations off Fifth Avenue there are road spurs that end abruptly suggesting that there was once the plan to extend the adjoining 1970's housing development at a later stage. These spurs create undesirable dead ends with no frontage and there is great potential to integrate these into the development of this site to provide an improved urban edge to the estate.

## Drainage

Based upon an agreed set of assumptions a Quick Storage Estimate (QSE) has been calculated for both a 100 year and 30 year plus climate change event based on 5 l/s and 1 ha for each half of the site. This provides an approximate volume of storage required in the development of the site.

The masterplan layout has been developed to ensure that the amount of storage can be accommodated on site. The eventual drainage solution will be determined at a later stage but could include SUDS, swales, ponds, permeable paving, underground tanks or a combination the above.



The technical analysis demonstrates that the development is both deliverable and credible creating a robust evidence base to support its allocation in the South Kesteven Local Plan.

### Topography

The highest point of the site is along the eastern boundary and slopes down towards the western boundary by approximately 20m. The site is divided by a natural high ridge running east west. The masterplan has been based on an accurate topographical survey of the site and its surroundings.

### Amenity of Existing Dwellings

The site has dwellings located along the boundary to the West. These existing dwellings at the closest point are located approximate 12m from the site boundary, increasing to 25m as the dwellings move towards the South. Due to the potential level differences, proposed dwellings along this boundary are set back to avoid any unnecessary loss of privacy.

### Solar Orientation

Dwellings will predominately face East and West with gardens benefitting from the sun for much of the day. The position of the internal rooms should make the best use of the orientation.

### Utilities

There are two existing overhead power lines which run across and the site and along the boundary to the East. These cables are buried as they move towards the residential settlement and it is the intention that these will be buried within the site to facilitate any new development.

There is currently no gas supply to the site and no water mains across the site. The covered reservoir to the South East has a concentration of distribution pipes running parallel with Harrowby Lane.

### Foul Water

There are currently no sewerage services running across the site. The existing infrastructure to the West will allow for connections into the adopted network. These are either to the North at the corner of Fifth Avenue or to the South along Harrowby Lane. Both these locations work well with the site levels and prevent the need for pumping stations.



# Facilities and Amenities



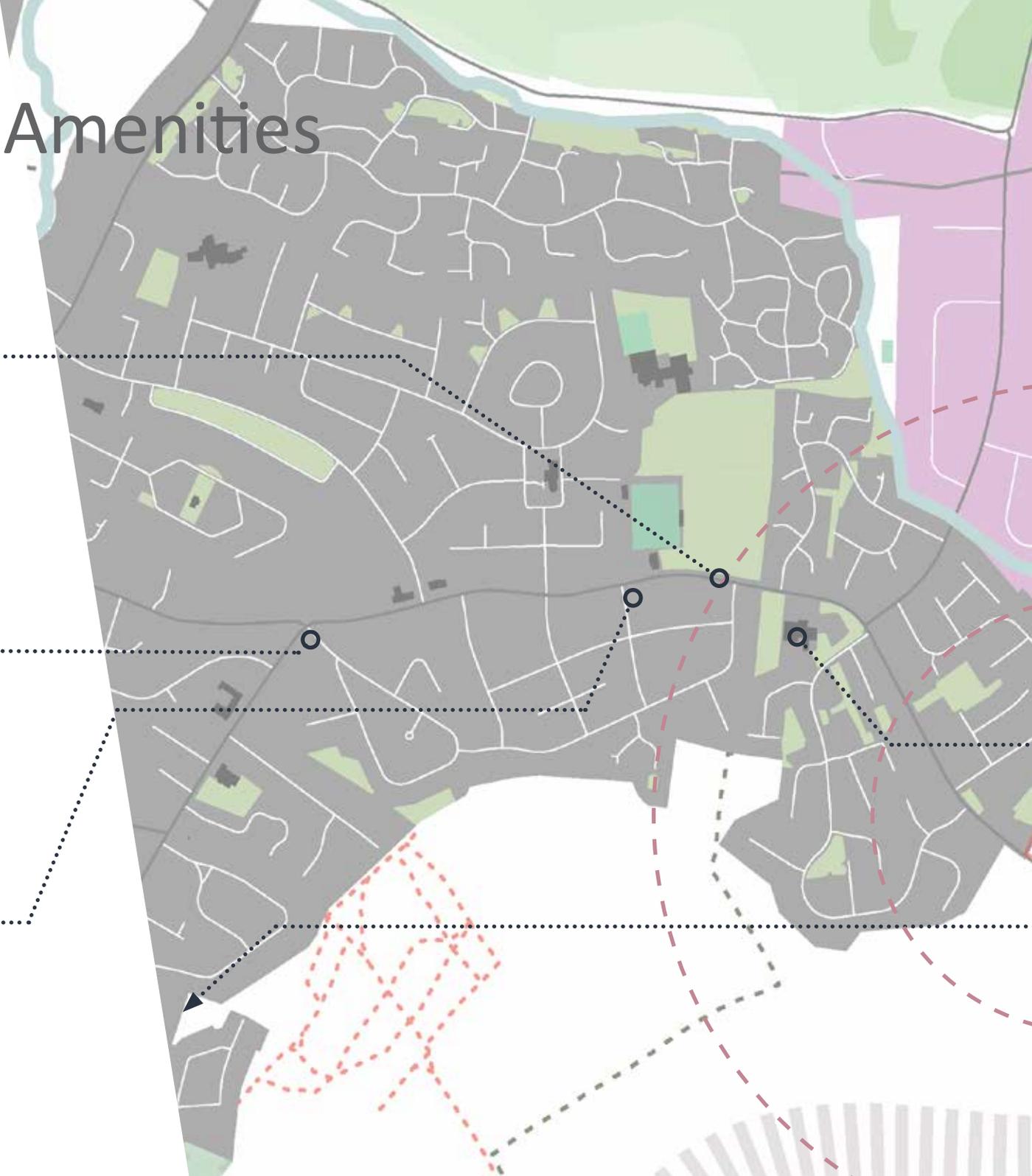
**LOCAL SHOPS**



**GRANTHAM HIGH STREET**



**SUPERMARKET**





**RECREATIONAL AMENITY**



**LOCAL OPEN SPACE**



**EMPLOYMENT**



**EDUCATION**



**GRANTHAM TRAIN STATION**

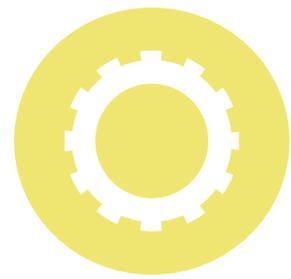
400M

800M

SITE

There are a range of existing facilities, including Belmont Community Primary School, Harrowby C of E Infants School, Harrowby Lane Doctors Surgery, Harrowby Lane Methodist Church, Tesco Express, local shops and takeaways, public houses, a children's equipped play area and hard courts for football. These facilities are all within walking distance to the site and already serve the immediate neighbouring areas and will be available to the proposed development when it is completed.

The town centre is located approximately 2.5km away offering a variety of retail outlets, restaurants and cafes as well as Grantham Station which provides local and national rail services across the country.





PRINCIPLE OF  
DEVELOPMENT

# Planning Context

This section is intended to provide a strategic overview of planning policy and identify areas of common focus that can be brought through into a future planning application made for the site. The importance of the Development Plan is clear given the requirements of Section 38(6) of the 2004 Planning and Compulsory Purchase Act whereby all planning applications have to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Document	Relevant Policy/ Commentary	Document	Relevant Policy/ Commentary
Grantham Townscape Assessment	<ul style="list-style-type: none"> <li>» The site lies to the edge of character area 7C – Londonthorpe and Harrowby Lane (east).</li> <li>» A notable characteristic of the area is the views to tree lined ridge to east and west. Mostly two storey and bungalow development, strong presence of trees, wide streets with grass verges. Much of the development is inward facing.</li> <li>» Post war housing with topography rises steadily to south and east. The area is not considered to be legible and lacks a sense of place. Many areas have dead frontages onto principal routes.</li> <li>» There are no statutory listed buildings and no designated conservation area within this character area.</li> <li>» Whilst the eastern edge is sensitive to change, where development maintains views limited expansion could be possible. Views should be retained to the ridgeline and buildings of an appropriate scale located in such a way so views are not impeded.</li> <li>» There are also opportunities to enhance green boundaries and urban edge of the area.</li> </ul>	South Kesteven Landscape Sensitivity and Capacity Report (2011 and 2013)	<ul style="list-style-type: none"> <li>» The study relates to the landscape capacity of specific sites within the Grantham area. The document assesses the landscape capacity of sites and their suitability of development.</li> <li>» Some of those that are classed as sensitive to change and that have a low capacity for development have been assessed as suitable for housing within the 2015 SHLAA indicating that housing development could be accommodated on site subject to detailed development proposals coming forward.</li> <li>» The 2013 assessment included the review of some additional sites. This indicated that Study Area C Harlaxton Close – which is a similar scale to Harrowby Lane is designated as sensitive in the LCA and as a SAP is identified as having capacity for development.</li> <li>» Although partly covered by previous Local Plan Policy EN4 ‘Prominent Areas for Special Protection’ it is the higher, more steeply sloping fields rising to the ridge of high ground to the south that are prominent and more sensitive;</li> <li>» Views of the area are limited and there is scope for mitigating potential visual impact.</li> </ul>
South Kesteven Landscape Character Assessment (2007)	<ul style="list-style-type: none"> <li>» Area is defined a sensitive landscape area, although the particular areas of sensitivity includes Belton Park and protecting the gaps between Grantham and the adjacent villages.</li> <li>» Built development on higher scarp slopes or skylining should be avoided.</li> <li>» New development and structural landscape can be used to soften existing harsh urban edges.</li> <li>» Maintain a varied urban edge with fringes of countryside extending into the town.</li> <li>» Opportunities for enhanced access to the countryside around the edge of the town should be considered in development proposals.</li> <li>» Where existing development occurs on higher ground, tree planting proposals to soften the roofscapes on the skyline should be considered.</li> </ul>	AECOM Grantham Capacity and Limits to Growth Study	<p>The AECOM Report provides a very broad overview of the suitable directions for growth within the town and acknowledges its limitations in the suitability of development on smaller sites. It:</p> <ul style="list-style-type: none"> <li>» States “land identified as not suitable for development may have the potential to remain suitable for smaller scale development”</li> <li>» The site lies within “Area 2 – east of Grantham” and “Zone C”</li> <li>» The report highlights the land is Grade 3 agricultural land (although much of the last in the area is Grade 2).</li> <li>» Harrowby Lane identified as one of most suitable areas for development in terms of transport and accessibility.</li> <li>» Harrowby Lane identified as attractive cycling route.</li> <li>» Any development in this area to be promoted at Harrowby Lane / Somerby Hill.</li> <li>» The landscape sensitivity is highlighted, particularly to the setting of the town.</li> <li>» Highlights that there area high barriers to affordable housing which can be rectified through development.</li> </ul>
Belton House Setting Study	<ul style="list-style-type: none"> <li>» Site not within the area that can be seen from the roof of Belton House.</li> <li>» Site not within area visible from first floor viewing platform of Bellmount Tower</li> <li>» Area visible from approach points and development in the foreground of these views classed as sensitive.</li> </ul>		

Name / Allocation Ref		Townscape Assessment 2011	Landscape Character Assessment 2007	Landscape Sensitivity and Capacity 2011	Landscape Sensitivity and Capacity 2013	Belton House Setting Study 2010
Northern Quadrant	GR3-H2 GR3-H3	<ul style="list-style-type: none"> <li>17b – Landscape Fringe – important views from Great Gonerby</li> <li>Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>Low and Medium Landscape Sensitivity.</li> <li>GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li><b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>Part of site visible from roof of Belton House</li> <li>Visible from Bellmount Tower</li> </ul>
Southern Quadrant	GR3-H1 GR3-H5	<ul style="list-style-type: none"> <li>17e – Landscape Fringe</li> <li>Green rim which <b>encircles</b> town deemed important</li> <li>Ecological issues and <b>landscape issues need to be treated with care.</b></li> <li>Very important archaeological remains.</li> </ul>	<ul style="list-style-type: none"> <li>Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>GR3-H5 is identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Not visible</li> </ul>
Manthorpe	GR3-H4	<ul style="list-style-type: none"> <li>17a – Landscape Fringe – <b>retain open setting of Manthorpe</b> and St John’s Church</li> <li>Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>GR3-H4 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li><b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>Part of site visible from roof of Belton House</li> <li>Visible from Bellmount Tower</li> <li>Visible from outside of park</li> </ul>
Southern Gateway Employment	GR-SE1	<ul style="list-style-type: none"> <li>17d – Landscape Fringe – open views in all directions.</li> <li>Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>Minor part of site <b>in Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>Minor part of site visible from roof of Belton House</li> </ul>
Low Road, Barrowby	LV-H3	<ul style="list-style-type: none"> <li>17c – Landscape Fringe</li> <li>Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>Identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Not visible</li> </ul>
Easthorpe Road, Great Gonerby	LV-H8	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>Not assessed</li> </ul>	<ul style="list-style-type: none"> <li><b>Element 1 and 3 – Exceptionally / Very Sensitive to Major Development</b></li> <li>Visible from Bellmount Tower</li> </ul>



PRINCIPLE OF  
DEVELOPMENT

# Planning History

The purpose of this promotion document is to demonstrate that the land at Harrowby Lane is a technically sound site that can accommodate housing within short term to assist in meeting the housing needs of Grantham, as the main focus for growth within South Kesteven.

## Planning History

An outline application was submitted for the site in March 2017 for a residential development of up to 100 dwellings (Use Class C3) with associated access, open space, landscaping and infrastructure improvements (application ref: S17/0566).

On the 14th February 2018 the permission was refused for the following reasons:

1. Impact upon landscape;
2. Impact local heritage assets;
3. Absence of a sustainable drainage scheme;
4. Limited information in respect of a mineral assessment;
5. Unable to demonstrate that infrastructure required for the proposal would be provided;
6. Insufficient mitigation for the adjacent Alma Park Local Wildlife Site

Following this, an appeal was made on behalf of our client Absolute Property Development Ltd against South Kesteven District Council's decision to refuse planning permission on the site.

At the appeal the development was reduced from 100 units to up to 75 units in which a larger area of grassland would be retained, thereby addressing concerns about the effect of the proposal on the grassland habitat and the wider ecological network.

Following the submission of additional documentation in respect of drainage and mineral matters and revised section 106 agreement, the Council agreed as part of the Statement of Common Ground that these reasons for refusal were no longer contested, thus demonstrating the site is relatively unconstrained in terms of technical issues.

The two issues debated as part of the appeal were:

- 1) The effect of the proposal on the landscape character of Grantham;
- 2) The effect of the proposal on the setting of a number of designated heritage assets

The Inspector found that the proposed development would have a harmful effect on the landscape setting of the town, and that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets. For these reasons, the appeal was dismissed on 10th July 2019.

Following the appeal decision and recent conversations with South Kesteven District Council the client is looking to reduce the development on the site even further, as detailed on page 18-19.

Through the two options proposed as part of this Call for Sites submission, the impact on landscape character and setting of heritage assets is completely addressed, as set out in the adjacent table and detailed through the remainder of the Vision Document.

## Response as part of Application and Appeal

## Response as part of the Reduced Options (50 and 20 units)

<b>Transport</b>	The site is in an extremely sustainable location and well connected to local facilities and public transport. The traffic impact of the proposed development on the highway network was assessed and deemed to be very low. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Further reduce the impact on the local network given the smaller scheme, of either 50 or 20 dwellings.
<b>Access</b>	Vehicular, cycle and pedestrian access into the site is to be taken from Harrowby Lane was agreed as part of the outline application. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Access to remain the same as previous proposal.
<b>Drainage/ Flood Risk</b>	A revised drainage strategy (2018) was prepared by Curtins as part of the Appeal process. Lincolnshire County Council's Environment and Economy Directorate (LCC) agreed the it represented a sustainable drainage system (SuDS). The proposed drainage strategy also provides betterment through the provision of a filter drain type of arrangement to alleviate pre-existing surface water flooding issues. <b>There were no drainage or flood risk objections to the proposals as part of the Planning Application/Appeal.</b>	The reduced scheme still utilises the drainage strategy as agreed as part of the Appeal and so will represent a sustainable drainage system and benefit residents on lower ground.
<b>Minerals</b>	LCC agreed as part of the application and appeal process that the site is unsuitable for minerals extraction and that the development of the site would not sterilise land for future minerals extraction. <b>There were no minerals objections to the proposals as part of the Planning Application/Appeal.</b>	The same applies.
<b>Landscape</b>	<p>The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment</p> <p>It is our view the site forms a relatively small part of the landscape setting of Grantham and there are other areas of land such as the prominent Hall's Hill which contribute significantly more. The development was anticipated to have beneficial long term effects on the eastern edge of Grantham, through the visual continuation of woodland across the ridgeline and tiered planting throughout the development</p>	The reduced schemes detailed within this Vision Document would involve development on the lowest levels of the site only, containing the built visual envelope, which would have limited landscape impact, as acknowledged by the Appeal Decision (para 14).
<b>Heritage</b>	<p>The Inspector found that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets, bar Harrowby Hall and Arch.</p> <p>It should be noted that remaining heritage assets are located at a distance from the site, two of which had no intervisibility. The impact as such would be very minor and certainly less than many other approved schemes in Grantham. The Heritage Impact Statement stated that the development would not undermine heritage values.</p>	The reduced scheme detailed in this Vision Document would be located on the lowest levels of the slope meaning the visual impact and interface between the site and any heritage assets would be nil. The scheme has been designed to take into account the countours of the land and will sit behind the existing rooflines to liensure there will be no impact on long range views, including those from listed buildings.



PROPOSALS AT  
HARROWBY

# Proposals at Harrowby

The proposals have responded directly to the Inspector's comments made as part of the appeal (APP/E2530/W/18/3208890) where it was suggested at paragraph 14 that the lower levels of the site could form part of the visual envelope of the town and do not contribute to the open and natural appearance of landscape character.

As such, the this vision document presents 2 options for assessment as part of the Call for Sites that concentrate development on the lower slopes, working with the contours so that houses sit behind the existing built form and do not encroach up the slope.

The options will achieve an average density of approximately 15-22 dwellings per hectare which while low density, provides a balanced approach to housing and green space and responding to the existing context. The scale of the development will be predominately 2 storey. In terms of a variety in the heights and massing of the buildings, this is achieved through the use of a range of house types and sizes ranging from smaller 2 bed units to 4 bed plus bedroom houses.

This range of house types will also affect the massing by providing a change in the eaves and ridge height creating subtle changes in scale. Landmark buildings, focal points and a clear hierarchy of routes and intersections are considered to increase the legibility of development.

	OPTION 1	OPTION 2
<b>SITE AREA</b>	2.25 hectares	1.65 hectares
<b>AMOUNT</b>	50 Dwellings	25 dwellings
<b>SCALE</b>	1.5/2 storeys	1.5/2 storeys
<b>MIX</b>	2, 3 and 4 bedroom homes	2, 3 and 4 bedroom homes
<b>AFFORDABLE HOMES</b>	Policy compliant	Policy compliant
<b>PUBLIC BENEFITS</b>	<ul style="list-style-type: none"><li>• Boost supply of housing - in an area where a five year supply of housing land is not currently in place;</li><li>• Ecological enhancement - through retention of existing planting and new planting features;</li><li>• New public open space - including new areas of play;</li><li>• Improve access to Alma Wood;</li><li>• Creating a high quality built environment;</li><li>• Improvements to the existing drainage of the area;</li><li>• Contributions to services and infrastructure via S106</li></ul>	

**OPTION 1**

50 dwellings



**OPTION 2**

25 dwellings





PROPOSALS AT  
HARROWBY

# Design

The style of the new dwellings will respect and reflect the local architecture surrounding Grantham, which forms a strong link to Lincolnshire's rich rural history. The eventual design strategy will incorporate best practice design principles to ensure that dwellings are built to a high quality and standard. The layout ensures that privacy standards and the streetscape are not compromised through the topography of the site.

## Design

Houses are arranged to create an attractive setting of roof forms and vistas towards the site and within the site itself.

House layout and orientation will respond to its position within the site, the immediate topography and its position relative to footpaths, open areas and other carefully interlaced green spaces.

Pitched roofs with primary gable elevations will create interest and formality to the dwellings, especially when viewed as part of the streetscape. Careful and sensitive design of primary facades and a family of details for windows, entrances and recessed porches, will ensure the design forms its own identity without reverting to pastiche or imitation.

The architectural design as illustrated within the document is largely indicative, for the purpose of layout only. Further design development would need to take place to develop the architectural detail.

## Working with the Levels

Working closely with the existing levels, the dwellings have been positioned to coordinate with the contours by creating plateaus of development. This will allow for dwellings adjacent to the highway to remain predominately at the same level.

The spaces between the dwellings front to back are used to take up the difference in levels across the site. At the most extreme locations, split level dwellings and large landscaping zones will help to overcome these challenges.

## Relationships of Houses to Roads

In order to enclose space effectively, buildings will be sited close to the back edge of the public footway and this will require car parking to be sited between houses or within garages. This has the advantage of reducing the visual impact of on-site parked cars and to increase the amount of site area available for private rear gardens.

## Rear Privacy

Residents have high expectation of privacy from the private or garden side of the dwelling. In a medium density layout it should be possible to avoid any overlooking. Every effort has been made to avoid overlooking of rear facing living room windows. This has been achieved by considered design, building orientation, working with the existing site levels and innovative landscape led proposals.

## Garden Sizes

A minimum private rear garden of 75m<sup>2</sup> has been provided for all types of houses. This provision has been found to be an acceptable and workable minimum size that accommodates most household activities.

## Accessibility

All new dwellings should be able to be visited unassisted by disabled people as far as the entry to the dwelling. The 'Lifetime Homes' concept, will be adopted for an agreed percentage of the dwellings.

### Space Standards

Dwellings will be designed in accordance with the principals set out within the Technical Housing Standards- Nationally Described Space Standards to ensure the dwellings are of an appropriate size to create a viable and marketable development.

An element of affordable housing will be provided within the development in small clusters and could include social rented, shared ownership and low cost/reduced cost market housing.

### Daylight and Sunlight

Good natural light makes dwellings more attractive, pleasant and energy-efficient. The Housing layout will be designed to maximise daylight and sunlight to dwellings as far as possible, but not to the exclusion of other considerations, such as privacy or the achievement of an attractive streetscape.

Dwellings have been positioned a minimum of 21m apart, where dwellings are on an elevated platform these distances will increase to compensate. As a rule adjoining properties will not obstruct views above 20o from a horizontal position.

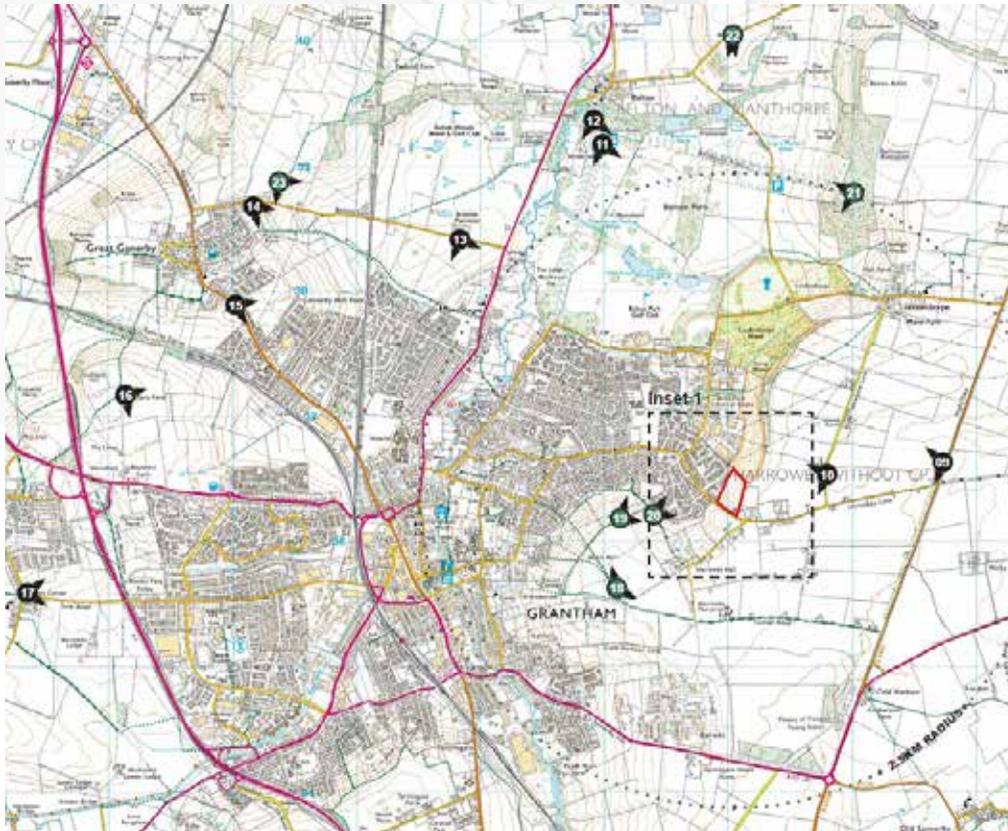




PROPOSALS AT  
HARROWBY

# Heritage & Landscape Impact

The revised scheme has been amended to take account of the comments made in the recent planning appeal, concentrating development on the lower levels of the site where it was considered it doesn't contribute to important landscape character (Inspectors Report, para 14). The revised scheme has been prepared to contain the visual envelope as demonstrated in these long range views, where development has been positioned to work with the contours so as to sit neatly behind the rooftops of existing built form and not



## Views to and from Heritage Assets

The following images identify the long range views to the site, the most significant of these is the designed landscape and setting of Belton House, some 3km north/northwest of the site.

The scheme has been revised so that there is no development punctuating the horizon when viewed from the roof of Belton House. Additionally, the Belton House Setting Study (2010) jointly commissioned by the National Trust and South Kesteven Council, shows that the proposed site is not within the zone of theoretical visibility as viewed from the roof of the house.

The site cannot be seen at all from Bellmount Tower and the reduction in built form means the site will not be experienced in views together with the Tower.

## Other Long Range Views

The other long range views are shown, many of which are glimpsed views from roads or public footpaths, with intervening vegetation. The revised scheme would retain the visual envelope with the development sitting neatly behind the rooftops of the existing built form and retaining the 'clearly defined rural hinterland' the Inspector refers to.

The site is not visible at all from the steps of Belton House



The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



The site is not visible at all from the steps of Belton House



The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



	Planning Application and Appeal (100 units)	Option 1 (50 units)	Option 2 (25 units)
<b>Green Rim</b>	The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment	A further reduction in the number of dwellings and resultant stepping away from the highest point of the site would reduce the degree of visual intrusion.	Reducing the scale of development to 20 units means the majority of the site is located on the lowest level of the site with a significant proportion of the site undeveloped and/ or provision of open space.
<b>Belton House and RPG</b> Grade I Listed	The introduction of built development into a landscape seen in views from Belton House roof as almost pristine and undeveloped, would be of moderate harm the significance that Belton House and the RPG derive from this setting (para 30 Appeal Decision).	The reduced scheme of up to 50 units would mean that this development option would not be seen in views from Belton House roof.	The reduced scheme of up to 20 units would mean that this development option would not be seen in views from Belton House roof.
<b>Bellmount Tower</b> Grade II* Listed	There is no inter-visibility between the Tower and the site itself by virtue of the woodland and intervening curves in the escarpment. The development would however represent a small-scale change in the character of the wider context in which the Tower is experienced in some views (para 32 Appeal Decision).	The reduced scale of development, located in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptable change in which the Tower is experienced.	The reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptable change in which the Tower is experienced.
<b>Harrowby Hall and Arch</b> Grade II* Listed	These listed buildings are somewhat concealed by the fact that they are within a dip at the edge of the wider plateau and so “would not diminish the sense of rural approach and setting of these heritage assets to any great degree” (para 34 Appeal Decision).	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.
<b>St Wulfram’s Church</b> Grade I Listed	The development breaches the existing extent of built form on the eastern side of the town and includes development on the open green space above the settlement, impacting upon the rural setting of St Wulfram’s. However this to some degree was mitigated by the reduction in the scale of the proposal (para 36 Appeal Decision).	The reduced scale of development, located further in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptable change in which St Wulfram’s is experienced.	he reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptable change in which St Wulfram’s is experienced.



PROPOSALS AT  
HARROWBY

# Landscape Benefits and Connectivity

As a development Harrowby Lane aims to create a safe and inclusive extension to the existing residential area. There are huge opportunities to improve the urban edge in this location to make better use of land and create improved overlooking to address some of the concerns regarding antisocial behaviour that have been reported through previous consultations.

Key to establishing a 'heart' or centre to the scheme is creating a space with a high enough frequency of use that it becomes a place to go & enjoy the passive/active company of people.

This has been achieved through various spatial planning strategies. Firstly, the 'heart' is linear; running through the centre of the site from north to south. This aims to make a space that is easily accessible to every resident within the scheme.

Secondly, the linear space responds to present & anticipated future walking routes (potential popular future activity amongst residents due to the site's location, views, & proximity to Alma Woods). This aims to attract future & existing residents into the space - for their everyday and recreational journeys - thus achieving high usage & safer environment.

Thirdly, shared space streets & narrowed portions of the loop road create numerous possibilities for residents to move from the loop road, on the periphery of the site, into and across the shared recreational space in the centre. From the outset, this achieves safer pedestrian movement due to the design's prioritising of people.

Finally, the design of the space itself achieves a sense of openness due to its proportions, and yet critically has a density of use that makes the 'heart' of the scheme lively and animated.

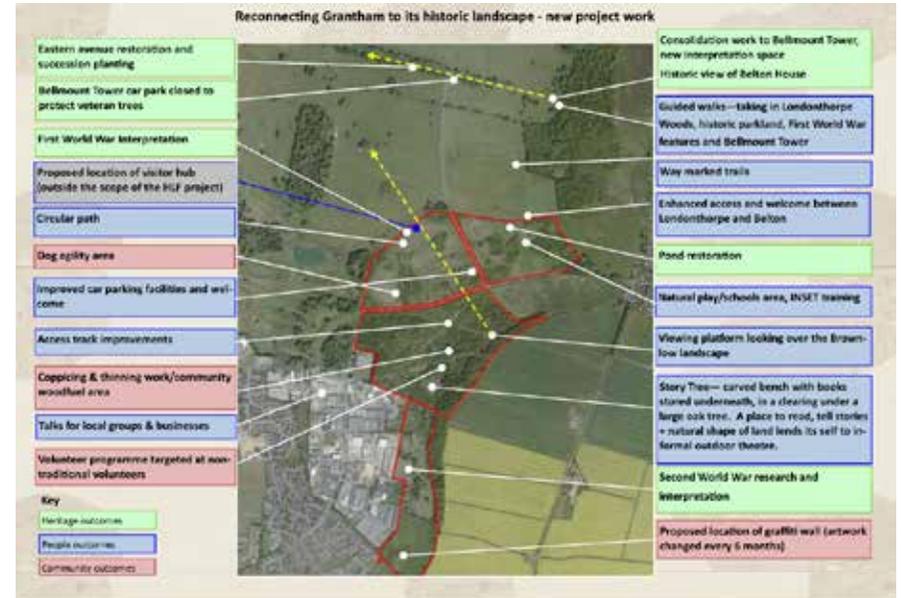
***There is also the opportunity to provide a more direct route to Alma Woods that is green, attractive links into the wider 'Reconnecting Grantham to its Heritage' project that the Woodland Trust and National Trust are promoting through Heritage Lottery funding.***

Initial conversations have been held with Ian Froggatt at the Woodland Trust regarding the creation of sustainable footpaths to the woods, along with tree planting should an application be approved.

The National Trust and the Woodland Trust, supported by National Lottery Players through the National Lottery Heritage Fund are working together to reconnect Grantham to its historic landscape. A key part of this is through interventions in Alma Park

  
Opportunity for improved connections, actively overlooked to reduce anti-social behaviour

  
Opportunity for funding to use 'left over' open space owned by SKDC





PROPOSALS AT  
HARROWBY

# Transport, Access and Parking

Curtins Consulting has played a key role in the evolution of the masterplan proposals to ensure that the transport, access and parking solutions to the site are deliverable. The site is highly sustainable offering a wide range of sustainable transport choices expected trip generation of the development is expected to be negligible on the local highway network.

## Access and Highways Layout

Site access will be located on Harrowby Lane and to consist of a simple priority junction with 2.4m x 43m visibility splay as set out in Manual for Streets. To accommodate the access junction and to reflect the definable change in characteristic of Harrowby Lane, the 30mph speed limit is to be extended past the site. This will also aid road safety.

The highway layout within the site has been developed to make vulnerable road users the priority through the use of shared surface areas, speed plateaus at all junctions and the use of off road paths throughout the site and linking to adjoining areas;

The site is permeable for pedestrians and cyclists allowing movement towards the Fifth Avenue area and towards the open country through rather than around the site.

## Parking Strategy

Many of the new dwellings will be served with on plot parking generally located to the side, front or rear of the dwelling. Parking spaces and garages will be sited so that there is sufficient room for users to enter and exit the vehicle. The distance from the car parking space to the home will be kept to a minimum and will be level or gently sloping. Disabled parking and cycling parking numbers will be provided in accordance with the appropriate standards.

## Traffic Generation

Traffic generation from the expected level of development would be x 2 way vehicle trips in the morning peak and x 2 way vehicle trips in the evening peak. This level of traffic generation would have no significant effect on local highway capacity.

## Servicing and Refuse Collection

The masterplan layout and highways design has been reviewed at a strategic level to ensure that servicing and refuse collection to the properties can be adequately achieved.



The site is permeable for pedestrians and cyclists and the design developed to make vulnerable road users a priority.

Car and cycle parking will predominately be on plot. In some areas courtyard car parking is proposed in line with best practice design principles.

New priority junction off Harrowby Lane will serve the development in line with the design requirements set out within the Manual for Streets.





PROPOSALS AT  
HARROWBY

# Biodiversity

The development will be able to deliver significant ecological benefit to the wider area, providing additional habitat and foraging potential for local wildlife, as well as linkages between fragmented wildlife communities.

It is anticipated that the improvements to landscape infrastructure will make a significant contribution to local wildlife habitats through the following ways:

- greatly increase the acreage devoted to planting;
- diversify the existing monotone nature of unimproved grassland;
- introduce new habitat typologies, with the introduction of wildflower meadow, standing water and associated marginal planting;
- improve now degraded elements such as over-mature and damaged boundary tree and hedge planting;
- Use a planting matrix with species indigenous to the local area, improving biodiversity;
- Create wildlife corridors between fragmented habitats, linking for example Alma Wood with the roadside verge and established hedgerow of the unclassified road south-east of the site.



Improve site-wide biodiversity, creating wildlife corridors and connecting fragmented wildlife communities

Broaden the diversity of wildlife habitats with the introduction of standing water, marginal planting and wildflower meadow

Use a palette of local native meadow, herb, shrub and tree species to improve biodiversity and reinforce local landscape character





PROPOSALS AT  
HARROWBY

# Drainage

The development will be able to deliver a sustainable urban drainage system, providing a suitable onsite drainage scheme as well as providing betterment to the pre-existing

## Drainage

A revised drainage strategy was prepared by Curtins in response to the LLFA comments and whilst the final drainage solution will be determined at a later stage, Lincolnshire County Council's Environment and Economy Directorate (LCC) have agreed to the principle of the drainage scheme as proposed.

The revised masterplan layout has been developed to ensure that the amount of storage can still be accommodated on site.

## Surface Water Design

Under the concept design, the surface water runoff and roofline drainage from the proposed development could discharge as follows:

- Provision of permeable driveways and swales as part of a sustainable drainage system (SuDS).
- Discharge rates can be restricted to Greenfield runoff rates of 5l/s/ha;
- Flow rates to be provided by installed flow restriction devices including SuDS basins and a cut off land drain across the eastern proportion of the site.

## Foul Water Drainage

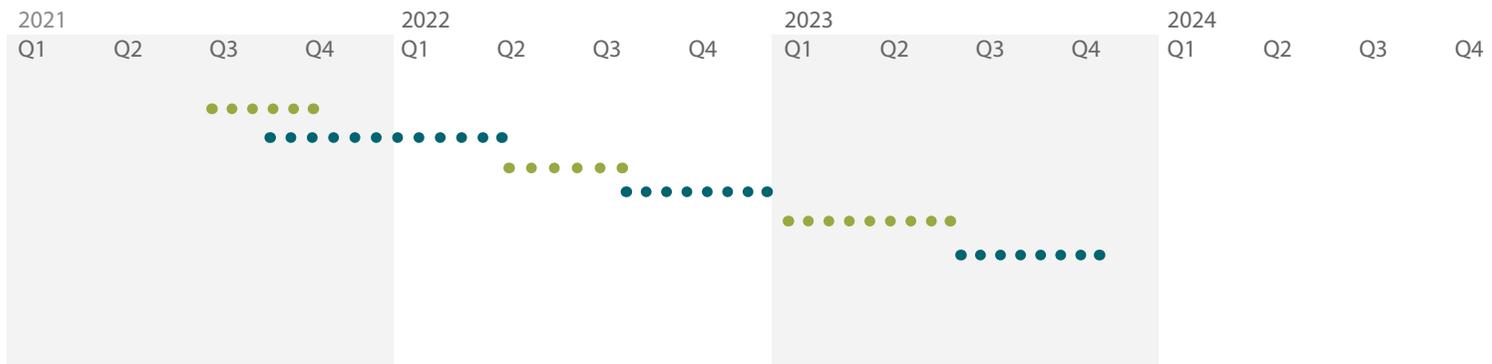
There is no existing foul water drainage on site. The development is proposed to connect to public sewers in the vicinity of the site at Harrowby Lane.



# Next Steps

## A short-term deliverable site

- Local Plan Preferred Options
- Outline Planning Application
- Appoint Builder / Contractor
- Reserved Matters Application
- Start Infrastructure Works
- Finalise Development





CONCLUSIONS

This vision document sets out how development can be delivered on the site which, following evaluation clearly represents an excellent candidate for allocation within the current planning context for the following reasons:

- » The site is available for development and can make a contribution of the district's short term land supply.
- » The site provides an extension of existing development, providing the opportunity to better integrate the existing housing to the countryside.
- » The site promotes quality housing that will meet the needs of the area and local residents.
- » Whilst there are challenges, these can be overcome through careful design and mitigation to provide a development that is a true asset to Grantham.

In short, the site has potential to deliver a well integrated, sustainable, mixed and positive residential addition to Grantham. We look therefore look forward to working with SKDC further to deliver development on the site.



DELIVERY

In terms of delivery, an indicative programme for the development of the site is provided below. This shows that the intention is to submit and progress the necessary planning permissions in tandem with the Local Plan preparation process. The landowner has current relationships with regional and national contractors who will be appointed once the principle of development is established through an outline planning application.

The roads and infrastructure would be installed followed by a phased development. The landowner is committed to the short-term delivery of the site with the intention that the site could make an early contribution to the housing numbers required by the District.



INVOLVEMENT

The proposal from the outset has been subject to meaningful engagement with the Council and prepared in the context of good practice guidance contained with the 2011 Localism Act, 2012 National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).

It is recognised that overall community input is key and that future matters of the approach to consultation will look to be agreed with SKDC. The design of the proposals will be discussed with key stakeholders including the Council, Grantham Civic Society, Londonthorpe and Harrowby Without Parish Council and local residents and we look forward to working with them over the coming years.



EVIDENCE BASE

Overall, it is well established that development plans need to be; positively prepared, justified, effective and consistent with national policy. Further, in order to include sites within SKDC land supply the sites need to be deliverable and developable (paragraph 47, footnote 11).

Following on from the call for sites submission, this vision document can be seen as the first step towards demonstrating and supporting the council in meeting the above criteria. It has sought to understand the traffic and access impact, ground conditions, landscape and heritage sensitivities and drainage implications alongside and to inform the detailed masterplan. Work to date therefore that the site is deliverable and developable following a masterplanning exercise to determine site capacity. The intention to build on this document effectively building the site's evidence base, guided future discussions with future iterations produced as required.



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# Harrowby Lane Grantham Vision Document

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# Harrowby Lane

Vision Document for a deliverable, sensitive extension to Harrowby



# Harrowby Lane

The vision for Harrowby Lane is set out as a series of design principles that together establish a high quality extension to the Harrowby neighbourhood of Grantham.

The proposals will help create an improved urban edge to the town and deliver between 20-50 new family homes in line with the housing needs of the area.

## LEGEND

- Public Space
- Private Gardens
- Water Retention
- Roadways
- Shared Access
- Shared Road
- Decking

## Vision

The Local Plan Review for South Kesteven provides an ideal opportunity to consider new sites for growth within the District. Major growth continues to be promoted within Grantham as a key economic centre not only within Lincolnshire, but sub regionally.

As highlighted in the recent Inspector's Report, a range of sites will clearly be required to deliver this growth through a combination of town centre sites, the major urban extensions and sustainably placed urban fringe locations.

Harrowby Lane has a long planning history and as such a wealth of information is available to support its development. This Vision Document outlines two proposals for the smaller and medium scale development of the site. Both options have been carefully designed within the existing contours of the land to ensure that landscape impact is minimal. The land at Harrowby Lane offers many benefits, including:

### A sustainable location

The neighbourhood will be well connected by bus to Grantham town centre and the wider public transport network to further reduce dependence on the private car.

### New homes with a strong identity

Harrowby Lane will have a strong identity and sense of place that reflects its urban fringe location. New development, together with existing homes and facilities will add to the well serviced neighbourhood.

### Landscape led design

New green infrastructure, incorporating and building upon the existing ecology, will provide coherent connections & form an attractive, well managed landscape setting for the new homes whilst providing opportunity for active leisure & play in a natural environment.

### Connections and Access to Local Area and Wider Countryside

The existing network of footpaths, cycleways & roads will provide convenient connections to Alma Wood, local education & play facilities including nearby shops.



# Content

## Introduction

This document has been prepared to support the allocation of land at Harrowby Lane for the development of approximately 25-50 dwellings on the eastern edge of Grantham.

The document has been prepared the following team of consultants:

- » Savills (UK) Ltd – Planning and Heritage
- » ArkleBoyce Architects - Architecture, Masterplanning and Urban Design
- » Urban Wilderness – Landscape Architecture
- » Curtins – Transport, Access, Drainage and Ground Conditions

From analysis and evaluation of the land it is evident that the site has the potential to create a deliverable, developable and sustainable scheme.

## Purpose

The purpose of this document is to consider the capacity and technical ability to deliver growth at the land at Harrowby Lane, on the eastern edge of Grantham ('the site') and evidence how sustainable development could be delivered, taking into account the most recent appeal decision for the site.

The Vision Document considers how development on the site could come forward in line with the growth aspirations of South Kesteven. The document considers:

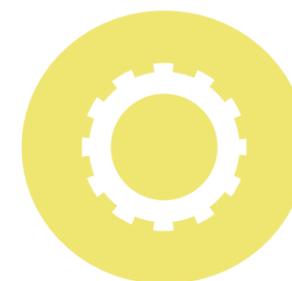
- » The site, its setting, placing it in the wider setting of Grantham
- » The technical challenges of delivering development on site, including landscape and visual impacts, heritage impact, topography, drainage, highways and ground conditions.
- » A vision and concept framework for sustainable development for the site.

## Background

Grantham is the main focus for growth within the area over the next 20 years as the key economic centre within the District. Given the level of growth required within and around the town the nature of the urban area and surroundings will change dramatically over the next 20 years. A range of housing sites of varying scales are required to achieve the growth and ensure that there is adequate and unconstrained land for development available to the market.

This document has been produced as part of the SKDC Call for Sites consultation and follows from a planning application and subsequent appeal made on the land.

The issues raised by the appeal have been thoroughly assessed and through the technical analysis a reduced scheme has been prepared addressing the landscape and heritage issues in full and the resulting revised scheme is submitted for consideration.



SITE  
CONTEXT



PRINCIPLE OF  
DEVELOPMENT



A SENSITIVE EDGE TO  
HARROWBY



SITE CONTEXT

# Location

The site is positioned on the eastern edge of Grantham on Harrowby Lane. The site abuts existing development in the form of 1970's sub-urban housing which is low to medium density. This housing is characterised by the significant green spaces and generous proportions given to the primary (loop) roads running through the site.

This is partly due to the change in level experienced by some of the housing, although the layout of the development is similar in areas where the topography is much flatter.

The site itself is greenfield and is currently used to graze livestock. The land is enclosed by established hawthorn hedging and self-seeded, semi-mature, ash and field maple along the Harrowby Lane boundary. The remaining boundaries are comprised of fragmented and overgrown sections of hawthorn, punctuated by occasional over-mature ash.

The land slopes from west to east and forms the lower to middle part of the ridge which runs to the east of Grantham. The site boundary however falls short of the ridge, and provides views across Grantham in a north-westerly direction. The site forms a generally consistent slope with the exception of a central area which projects slightly to form a 'headland'.

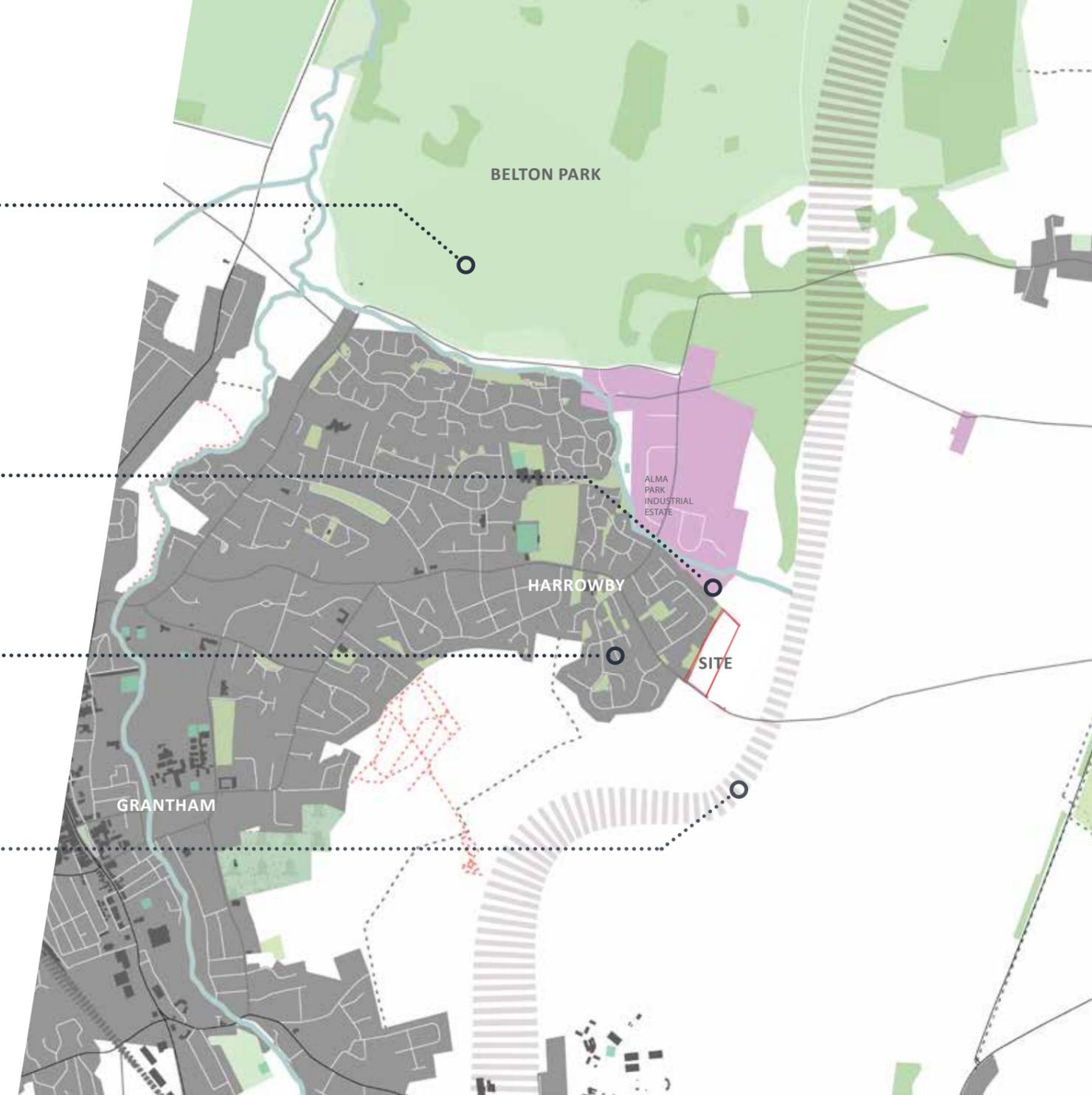
Site access can be obtained from three main points and there appears to have been gaps left within the adjoining 1970's housing development for the potential development of this site.

The local character along Harrowby Lane to the East is 1970s, 80s and 90s small to medium sized dwellings, offering medium to high density housing estates set on large loop roads and cul-de-sacs. The houses are located set within small to medium sized plots with generally small front and larger rear gardens. These dwellings are mainly two storey houses, interspersed with some bungalows.

Belton Park Golf Club is located c.1.5km from site and forms part of the Belton Park English Heritage Registered Park and Garden and which contains the Grade I listed Belton House.

To the North of the site sits a narrow strip of industrial buildings, Alma Park Industrial Estate.

The area around the site is on steadily rising land which plateaus around Canberra Crescent. The land then rises steeply to the East and South to form a ridge, covered by a mixture of open arable land and woodland.





SITE CONTEXT

# Local Character

The site is currently being used as pasture for grazing animals. Immediately to the west, the site predominately backs onto housing along Fifth Avenue with areas used for an informal children’s play area and a managed green embankment.

### Local Vernacular

In terms of the use of materials there is wide variation across the area, however, almost all would be generally considered as traditionally built; brick and tile. Brick is the predominant walling material throughout. There are many different colours, textures and finishes, from red, orange and buff bricks. Immediately to the west of the site along Ninth Avenue the houses are constructed from buff bricks with painted horizontal timber cladding.

Roofs are a mix of clay tile, either traditional plain tiles but mostly machine cut plain, or concrete interlocking tiles. There is the occasional use of modern pantile. Some natural slate survives to the older houses.

### Parks and Recreation

There is good provision of public open space throughout the area with a combination of pockets parks and green ways forming an integral part of new developments and aligned with a retained historic field boundaries and tree belts. The new development provides the opportunity to improve the access and surveillance to these spaces. There are large recreation and sports fields linked to schools, often with full public or semi-public access and connected by public rights of way.

### Trees and Hedges

There are only a few trees located within the site, with the highest concentration found along the boundaries to the north and south.

To the west, beyond the site boundary, there is a small informal managed green embankment with some mature ash and oak trees and overgrown hawthorn hedgerows. The site’s boundary comprises mainly hawthorn and bramble hedgerows, the vast majority of which are proposed to be retained and enhanced where appropriate.

### Landscape Character

Landscape character is defined by the ridge which serves to enclose the urban realm and provides a sense of visual containment. Alma Wood provides woodland cover along the ridge north of site. Other dispersed field boundary trees and hedges form a verdant approach to the town from the south and provide a green backdrop to Grantham when viewed from the opposite side of the valley.

View from site looking down Fifth Avenue and one of the existing small recreational areas





# Technical Analysis

As part of the masterplanning process a range of technical issues have been reviewed to inform the design solution and quantum of development that is achievable on the site.

## Highways and Movement

There are no public rights of way through the site, however there is an existing right of way adjacent to the boundary to the north, accessed through the children's play area on the corner of Fifth Avenue.

Vehicular movement is along the primary highway towards High Dike and Grantham Town Centre with secondary routes feeding residential estates. Pedestrian and cycle routes are only provided via the adopted footpaths.

## Access

Site access can be obtained from three main points. At two locations off Fifth Avenue there are road spurs that end abruptly suggesting that there was once the plan to extend the adjoining 1970's housing development at a later stage. These spurs create undesirable dead ends with no frontage and there is great potential to integrate these into the development of this site to provide an improved urban edge to the estate.

## Drainage

Based upon an agreed set of assumptions a Quick Storage Estimate (QSE) has been calculated for both a 100 year and 30 year plus climate change event based on 5 l/s and 1 ha for each half of the site. This provides an approximate volume of storage required in the development of the site.

The masterplan layout has been developed to ensure that the amount of storage can be accommodated on site. The eventual drainage solution will be determined at a later stage but could include SUDS, swales, ponds, permeable paving, underground tanks or a combination the above.



The technical analysis demonstrates that the development is both deliverable and credible creating a robust evidence base to support its allocation in the South Kesteven Local Plan.

## Topography

The highest point of the site is along the eastern boundary and slopes down towards the western boundary by approximately 20m. The site is divided by a natural high ridge running east west. The masterplan has been based on an accurate topographical survey of the site and its surroundings.

## Amenity of Existing Dwellings

The site has dwellings located along the boundary to the West. These existing dwellings at the closest point are located approximate 12m from the site boundary, increasing to 25m as the dwellings move towards the South. Due to the potential level differences, proposed dwellings along this boundary are set back to avoid any unnecessary loss of privacy.

## Solar Orientation

Dwellings will predominately face East and West with gardens benefitting from the sun for much of the day. The position of the internal rooms should make the best use of the orientation.

## Utilities

There are two existing overhead power lines which run across and the site and along the boundary to the East. These cables are buried as they move towards the residential settlement and it is the intention that these will be buried within the site to facilitate any new development.

There is currently no gas supply to the site and no water mains across the site. The covered reservoir to the South East has a concentration of distribution pipes running parallel with Harrowby Lane.

## Foul Water

There are currently no sewerage services running across the site. The existing infrastructure to the West will allow for connections into the adopted network. These are either to the North at the corner of Fifth Avenue or to the South along Harrowby Lane. Both these locations work well with the site levels and prevent the need for pumping stations.



# Facilities and Amenities



LOCAL SHOPS



GRANTHAM HIGH STREET



SUPERMARKET



RECREATIONAL AMENITY



LOCAL OPEN SPACE



EMPLOYMENT



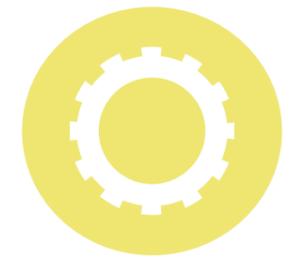
EDUCATION



GRANTHAM TRAIN STATION

There are a range of existing facilities, including Belmont Community Primary School, Harrowby C of E Infants School, Harrowby Lane Doctors Surgery, Harrowby Lane Methodist Church, Tesco Express, local shops and takeaways, public houses, a children's equipped play area and hard courts for football. These facilities are all within walking distance to the site and already serve the immediate neighbouring areas and will be available to the proposed development when it is completed.

The town centre is located approximately 2.5km away offering a variety of retail outlets, restaurants and cafes as well as Grantham Station which provides local and national rail services across the country.





PRINCIPLE OF DEVELOPMENT

# Planning Context

This section is intended to provide a strategic overview of planning policy and identify areas of common focus that can be brought through into a future planning application made for the site. The importance of the Development Plan is clear given the requirements of Section 38(6) of the 2004 Planning and Compulsory Purchase Act whereby all planning applications have to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Document	Relevant Policy/ Commentary	Document	Relevant Policy/ Commentary
Grantham Townscape Assessment	<ul style="list-style-type: none"> <li>» The site lies to the edge of character area 7C – Londonthorpe and Harrowby Lane (east).</li> <li>» A notable characteristic of the area is the views to tree lined ridge to east and west. Mostly two storey and bungalow development, strong presence of trees, wide streets with grass verges. Much of the development is inward facing.</li> <li>» Post war housing with topography rises steadily to south and east. The area is not considered to be legible and lacks a sense of place. Many areas have dead frontages onto principal routes.</li> <li>» There are no statutory listed buildings and no designated conservation area within this character area.</li> <li>» Whilst the eastern edge is sensitive to change, where development maintains views limited expansion could be possible. Views should be retained to the ridgeline and buildings of an appropriate scale located in such a way so views are not impeded.</li> <li>» There are also opportunities to enhance green boundaries and urban edge of the area.</li> </ul>	South Kesteven Landscape Sensitivity and Capacity Report (2011 and 2013)	<ul style="list-style-type: none"> <li>» The study relates to the landscape capacity of specific sites within the Grantham area. The document assesses the landscape capacity of sites and their suitability of development.</li> <li>» Some of those that are classed as sensitive to change and that have a low capacity for development have been assessed as suitable for housing within the 2015 SHLAA indicating that housing development could be accommodated on site subject to detailed development proposals coming forward.</li> <li>» The 2013 assessment included the review of some additional sites. This indicated that Study Area C Harlaxton Close – which is a similar scale to Harrowby Lane is designated as sensitive in the LCA and as a SAP is identified as having capacity for development.</li> <li>» Although partly covered by previous Local Plan Policy EN4 ‘Prominent Areas for Special Protection’ it is the higher, more steeply sloping fields rising to the ridge of high ground to the south that are prominent and more sensitive;</li> <li>» Views of the area are limited and there is scope for mitigating potential visual impact.</li> </ul>
South Kesteven Landscape Character Assessment (2007)	<ul style="list-style-type: none"> <li>» Area is defined a sensitive landscape area, although the particular areas of sensitivity includes Belton Park and protecting the gaps between Grantham and the adjacent villages.</li> <li>» Built development on higher scarp slopes or skylining should be avoided.</li> <li>» New development and structural landscape can be used to soften existing harsh urban edges.</li> <li>» Maintain a varied urban edge with fringes of countryside extending into the town.</li> <li>» Opportunities for enhanced access to the countryside around the edge of the town should be considered in development proposals.</li> <li>» Where existing development occurs on higher ground, tree planting proposals to soften the roofscapes on the skyline should be considered.</li> </ul>	AECOM Grantham Capacity and Limits to Growth Study	<p>The AECOM Report provides a very broad overview of the suitable directions for growth within the town and acknowledges its limitations in the suitability of development on smaller sites. It:</p> <ul style="list-style-type: none"> <li>» States “land identified as not suitable for development may have the potential to remain suitable for smaller scale development”</li> <li>» The site lies within “Area 2 – east of Grantham” and “Zone C”</li> <li>» The report highlights the land is Grade 3 agricultural land (although much of the last in the area is Grade 2).</li> <li>» Harrowby Lane identified as one of most suitable areas for development in terms of transport and accessibility.</li> <li>» Harrowby Lane identified as attractive cycling route.</li> <li>» Any development in this area to be promoted at Harrowby Lane / Somerby Hill.</li> <li>» The landscape sensitivity is highlighted, particularly to the setting of the town.</li> <li>» Highlights that there area high barriers to affordable housing which can be rectified through development.</li> </ul>
Belton House Setting Study	<ul style="list-style-type: none"> <li>» Site not within the area that can be seen from the roof of Belton House.</li> <li>» Site not within area visible from first floor viewing platform of Bellmount Tower</li> <li>» Area visible from approach points and development in the foreground of these views classed as sensitive.</li> </ul>		

Name / Allocation Ref	Townscape Assessment 2011	Landscape Character Assessment 2007	Landscape Sensitivity and Capacity 2011	Landscape Sensitivity and Capacity 2013	Belton House Setting Study 2010
Northern Quadrant GR3-H2 GR3-H3	<ul style="list-style-type: none"> <li>• 17b – Landscape Fringe – important views from Great Gonerby</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Low and Medium Landscape Sensitivity.</li> <li>• GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Part of site visible from roof of Belton House</li> <li>• Visible from Bellmount Tower</li> </ul>
Southern Quadrant GR3-H1 GR3-H5	<ul style="list-style-type: none"> <li>• 17e – Landscape Fringe</li> <li>• Green rim which <b>encircles</b> town deemed important</li> <li>• Ecological issues and <b>landscape issues need to be treated with care.</b></li> <li>• Very important archaeological remains.</li> </ul>	<ul style="list-style-type: none"> <li>• Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H5 is identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not visible</li> </ul>
Manthorpe GR3-H4	<ul style="list-style-type: none"> <li>• 17a – Landscape Fringe – <b>retain open setting of Manthorpe</b> and St John’s Church</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H4 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Part of site visible from roof of Belton House</li> <li>• Visible from Bellmount Tower</li> <li>• Visible from outside of park</li> </ul>
Southern Gateway Employment GR-SE1	<ul style="list-style-type: none"> <li>• 17d – Landscape Fringe – open views in all directions.</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Minor part of site in <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Minor part of site visible from roof of Belton House</li> </ul>
Low Road, Barrowby LV-H3	<ul style="list-style-type: none"> <li>• 17c – Landscape Fringe</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not visible</li> </ul>
Easthorpe Road, Great Gonerby LV-H8	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 and 3 – Exceptionally / Very Sensitive to Major Development</b></li> <li>• Visible from Bellmount Tower</li> </ul>



PRINCIPLE OF DEVELOPMENT

# Planning History

The purpose of this promotion document is to demonstrate that the land at Harrowby Lane is a technically sound site that can accommodate housing within short term to assist in meeting the housing needs of Grantham, as the main focus for growth within South Kesteven.

## Planning History

An outline application was submitted for the site in March 2017 for a residential development of up to 100 dwellings (Use Class C3) with associated access, open space, landscaping and infrastructure improvements (application ref: S17/0566).

On the 14th February 2018 the permission was refused for the following reasons:

1. Impact upon landscape;
2. Impact local heritage assets;
3. Absence of a sustainable drainage scheme;
4. Limited information in respect of a mineral assessment;
5. Unable to demonstrate that infrastructure required for the proposal would be provided;
6. Insufficient mitigation for the adjacent Alma Park Local Wildlife Site

Following this, an appeal was made on behalf of our client Absolute Property Development Ltd against South Kesteven District Council's decision to refuse planning permission on the site.

At the appeal the development was reduced from 100 units to up to 75 units in which a larger area of grassland would be retained, thereby addressing concerns about the effect of the proposal on the grassland habitat and the wider ecological network.

Following the submission of additional documentation in respect of drainage and mineral matters and revised section 106 agreement, the Council agreed as part of the Statement of Common Ground that these reasons for refusal were no longer contested, thus demonstrating the site is relatively unconstrained in terms of technical issues.

The two issues debated as part of the appeal were:

- 1) The effect of the proposal on the landscape character of Grantham;
- 2) The effect of the proposal on the setting of a number of designated heritage assets

The Inspector found that the proposed development would have a harmful effect on the landscape setting of the town, and that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets. For these reasons, the appeal was dismissed on 10th July 2019.

Following the appeal decision and recent conversations with South Kesteven District Council the client is looking to reduce the development on the site even further, as detailed on page 18-19.

Through the two options proposed as part of this Call for Sites submission, the impact on landscape character and setting of heritage assets is completely addressed, as set out in the adjacent table and detailed through the remainder of the Vision Document.

## Response as part of Application and Appeal

## Response as part of the Reduced Options (50 and 20 units)

<b>Transport</b>	The site is in an extremely sustainable location and well connected to local facilities and public transport. The traffic impact of the proposed development on the highway network was assessed and deemed to be very low. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Further reduce the impact on the local network given the smaller scheme, of either 50 or 20 dwellings.
<b>Access</b>	Vehicular, cycle and pedestrian access into the site is to be taken from Harrowby Lane was agreed as part of the outline application. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Access to remain the same as previous proposal.
<b>Drainage/ Flood Risk</b>	A revised drainage strategy (2018) was prepared by Curtins as part of the Appeal process. Lincolnshire County Council's Environment and Economy Directorate (LCC) agreed the it represented a sustainable drainage system (SuDS). The proposed drainage strategy also provides betterment through the provision of a filter drain type of arrangement to alleviate pre-existing surface water flooding issues. <b>There were no drainage or flood risk objections to the proposals as part of the Planning Application/Appeal.</b>	The reduced scheme still utilises the drainage strategy as agreed as part of the Appeal and so will represent a sustainable drainage system and benefit residents on lower ground.
<b>Minerals</b>	LCC agreed as part of the application and appeal process that the site is unsuitable for minerals extraction and that the development of the site would not sterilise land for future minerals extraction. <b>There were no minerals objections to the proposals as part of the Planning Application/Appeal.</b>	The same applies.
<b>Landscape</b>	The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment  It is our view the site forms a relatively small part of the landscape setting of Grantham and there are other areas of land such as the prominent Hall's Hill which contribute significantly more. The development was anticipated to have beneficial long term effects on the eastern edge of Grantham, through the visual continuation of woodland across the ridgeline and tiered planting throughout the development	The reduced schemes detailed within this Vision Document would involve development on the lowest levels of the site only, containing the built visual envelope, which would have limited landscape impact, as acknowledged by the Appeal Decision (para 14).
<b>Heritage</b>	The Inspector found that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets, bar Harrowby Hall and Arch.  It should be noted that remaining heritage assets are located at a distance from the site, two of which had no intervisibility. The impact as such would be very minor and certainly less than many other approved schemes in Grantham. The Heritage Impact Statement stated that the development would not undermine heritage values.	The reduced scheme detailed in this Vision Document would be located on the lowest levels of the slope meaning the visual impact and interface between the site and any heritage assets would be nil. The scheme has been designed to take into account the contours of the land and will sit behind the existing rooflines to ensure there will be no impact on long range views, including those from listed buildings.



PROPOSALS AT HARROWBY

# Proposals at Harrowby

The proposals have responded directly to the Inspector's comments made as part of the appeal (APP/E2530/W/18/3208890) where it was suggested at paragraph 14 that the lower levels of the site could form part of the visual envelope of the town and do not contribute to the open and natural appearance of landscape character.

As such, the this vision document presents 2 options for assessment as part of the Call for Sites that concentrate development on the lower slopes, working with the contours so that houses sit behind the existing built form and do not encroach up the slope.

The options will achieve an average density of approximately 15-22 dwellings per hectare which while low density, provides a balanced approach to housing and green space and responding to the existing context. The scale of the development will be predominately 2 storey. In terms of a variety in the heights and massing of the buildings, this is achieved through the use of a range of house types and sizes ranging from smaller 2 bed units to 4 bed plus bedroom houses.

This range of house types will also affect the massing by providing a change in the eaves and ridge height creating subtle changes in scale. Landmark buildings, focal points and a clear hierarchy of routes and intersections are considered to increase the legibility of development.

	OPTION 1	OPTION 2
SITE AREA	2.25 hectares	1.65 hectares
AMOUNT	50 Dwellings	25 dwellings
SCALE	1.5/2 storeys	1.5/2 storeys
MIX	2, 3 and 4 bedroom homes	2, 3 and 4 bedroom homes
AFFORDABLE HOMES	Policy compliant	Policy compliant
PUBLIC BENEFITS	<ul style="list-style-type: none"> <li>• Boost supply of housing - in an area where a five year supply of housing land is not currently in place;</li> <li>• Ecological enhancement - through retention of existing planting and new planting features;</li> <li>• New public open space - including new areas of play;</li> <li>• Improve access to Alma Wood;</li> <li>• Creating a high quality built environment;</li> <li>• Improvements to the existing drainage of the area;</li> <li>• Contributions to services and infrastructure via S106</li> </ul>	





# Design

The style of the new dwellings will respect and reflect the local architecture surrounding Grantham, which forms a strong link to Lincolnshire's rich rural history. The eventual design strategy will incorporate best practice design principles to ensure that dwellings of built to a high quality and standard. The layout ensures that privacy standards and the streetscape are not compromised through the topography of the site.

## Design

Houses are arranged to create an attractive setting of roof forms and vistas towards the site and within the site itself.

House layout and orientation will respond to its position within the site, the immediate topography and its position relative to footpaths, open areas and other carefully interlaced green spaces.

Pitched roofs with primary gable elevations will create interest and formality to the dwellings, especially when viewed as part of the streetscape. Careful and sensitive design of primary facades and a family of details for windows, entrances and recessed porches, will ensure the design forms its own identity without reverting to pastiche or imitation.

The architectural design as illustrated within the document is largely indicative, for the purpose of layout only. Further design development would need to take place to develop the architectural detail.

## Working with the Levels

Working closely with the existing levels, the dwellings have been positioned to coordinate with the contours by creating plateaus of development. This will allow for dwellings adjacent to the highway to remain predominately at the same level.

The spaces between the dwellings front to back are used to take up the difference in levels across the site. At the most extreme locations, split level dwellings and large landscaping zones will help to overcome these challenges.

## Relationships of Houses to Roads

In order to enclose space effectively, buildings will be sited close to the back edge of the public footway and this will require car parking to be sited between houses or within garages. This has the advantage of reducing the visual impact of on-site parked cars and to increase the amount of site area available for private rear gardens.

## Rear Privacy

Residents have high expectation of privacy from the private or garden side of the dwelling. In a medium density layout it should be possible to avoid any overlooking. Every effort has been made to avoid overlooking of rear facing living room windows. This has been achieved by considered design, building orientation, working with the existing site levels and innovative landscape led proposals.

## Garden Sizes

A minimum private rear garden of 75m<sup>2</sup> has been provided for all types of houses. This provision has been found to be an acceptable and workable minimum size that accommodates most household activities.

## Accessibility

All new dwellings should be able to be visited unassisted by disabled people as far as the entry to the dwelling. The 'Lifetime Homes' concept, will be adopted for and agreed percentage of the dwellings.

## Space Standards

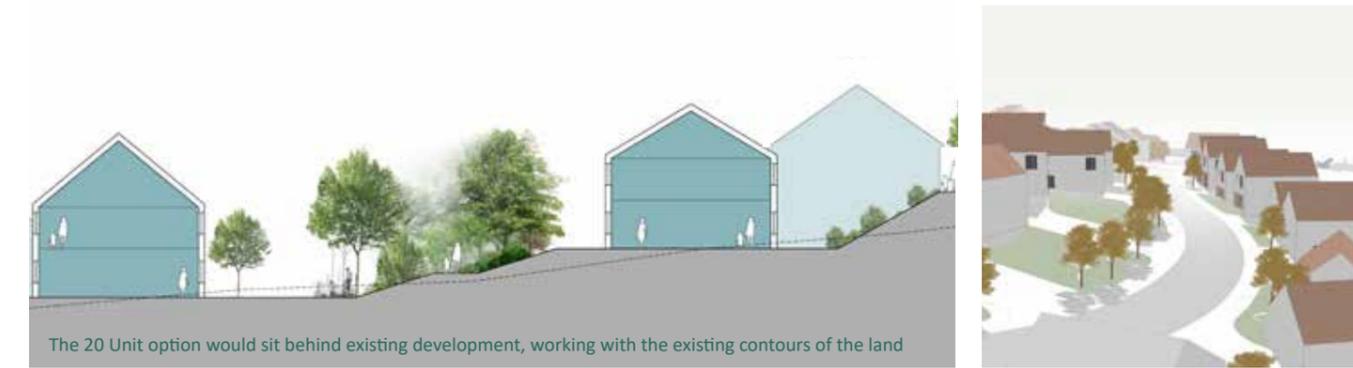
Dwellings will be designed in accordance with the principals set out within the Technical Housing Standards- Nationally Described Space Standards to ensure the dwellings are of an appropriate size to create a viable and marketable development.

An element of affordable housing will be provided within the development in small clusters and could include social rented, shared ownership and low cost/reduced cost market housing.

## Daylight and Sunlight

Good natural light makes dwellings more attractive, pleasant and energy-efficient. The Housing layout will be designed to maximise daylight and sunlight to dwellings as far as possible, but not to the exclusion of other considerations, such as privacy or the achievement of an attractive streetscape.

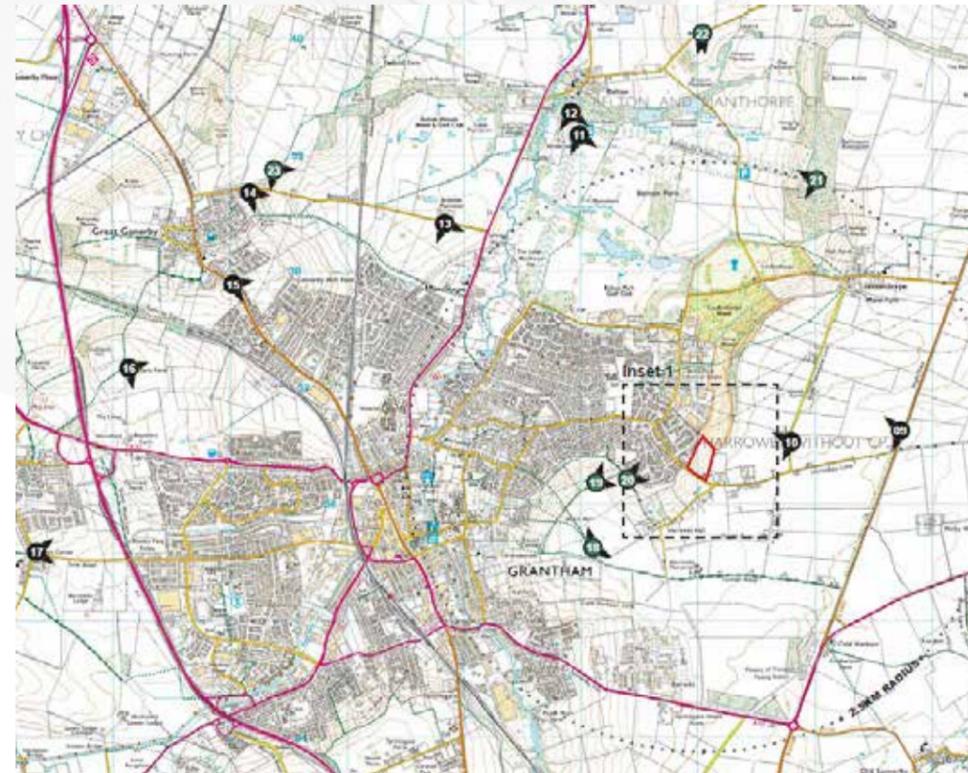
Dwellings have been positioned a minimum of 21m apart, where dwellings are on an elevated platform these distances will increase to compensate. As a rule adjoining properties will not obstruct views above 20o from a horizontal position.





# Heritage & Landscape Impact

The revised scheme has been amended to take account of the comments made in the recent planning appeal, concentrating development on the lower levels of the site where it was considered it doesn't contribute to important landscape character (Inspectors Report, para 14). The revised scheme has been prepared to contain the visual envelope as demonstrated in these long range views, where development has been positioned to work with the contours so as to sit neatly behind the rooftops of existing built form and not



### Views to and from Heritage Assets

The following images identifies the long range views to the site, the most significant of these is the designed landscape and setting of Belton House, some 3km north/northwest of the site.

The scheme has been revised so that there is no development punctuating the horizon when viewed from the roof of Belton House. Additionally, the Belton House Setting Study (2010) jointly commissioned by the National Trust and South Kesteven Council, shows that the proposed site is not within the zone of theoretical visibility as viewed from the roof of the house.

The site cannot be seen at all from Bellmount Tower and the reduction in built form means the site will not be experienced in views together with the Tower.

### Other Long Range Views

The other long range views are shown, many of which are glimpsed views from roads or public footpaths, with intervening vegetation. The revised scheme would retain the visual envelope with the development sitting neatly behind the rooftops of the existing built form and retaining the 'clearly defined rural hinterland' the Inspector refers to.

The site is not visible at all from the steps of Belton House



FIGURE 23: Viewpoint 11

The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



FIGURE 24: Viewpoint 12 - Existing Condition

There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



FIGURE 42: Viewpoint 21

The site is not visible at all from the steps of Belton House



The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



	Planning Application and Appeal (100 units)	Option 1 (50 units)	Option 2 (25 units)
Green Rim	The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment	A further reduction in the number of dwellings and resultant stepping away from the highest point of the site would reduce the degree of visual intrusion.	Reducing the scale of development to 20 units means the majority of the site is located on the lowest level of the site with a significant proportion of the site undeveloped and/ or provision of open space.
Belton House and RPG Grade I Listed	The introduction of built development into a landscape seen in views from Belton House roof as almost pristine and undeveloped, would be of moderate harm the significance that Belton House and the RPG derive from this setting (para 30 Appeal Decision).	The reduced scheme of up to 50 units would mean that this development option would not be seen in views from Belton House roof.	The reduced scheme of up to 20 units would mean that this development option would not be seen in views from Belton House roof.
Bellmount Tower Grade II* Listed	There is no inter-visibility between the Tower and the site itself by virtue of the woodland and intervening curves in the escarpment. The development would however represent a small-scale change in the character of the wider context in which the Tower is experienced in some views (para 32 Appeal Decision).	The reduced scale of development, located in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptible change in which the Tower is experienced.	The reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptible change in which the Tower is experienced.
Harrowby Hall and Arch Grade II* Listed	These listed buildings are somewhat concealed by the fact that they are within a dip at the edge of the wider plateau and so “would not diminish the sense of rural approach and setting of these heritage assets to any great degree” (para 34 Appeal Decision).	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.
St Wulfram’s Church Grade I Listed	The development breaches the existing extent of built form on the eastern side of the town and includes development on the open green space above the settlement, impacting upon the rural setting of St Wulfram’s. However this to some degree was mitigated by the reduction in the scale of the proposal (para 36 Appeal Decision).	The reduced scale of development, located further in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptible change in which St Wulfram’s is experienced.	The reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptible change in which St Wulfram’s is experienced.



PROPOSALS AT HARROWBY

# Landscape Benefits and Connectivity

As a development Harrowby Lane aims to create a safe and inclusive extension to the existing residential area. There are huge opportunities to improve the urban edge in this location to make better use of land and create improved overlooking to address some of the concerns regarding antisocial behaviour that have been reported through previous consultations.

Key to establishing a 'heart' or centre to the scheme is creating a space with a high enough frequency of use that it becomes a place to go & enjoy the passive/active company of people.

This has been achieved through various spatial planning strategies. Firstly, the 'heart' is linear; running through the centre of the site from north to south. This aims to make a space that is easily accessible to every resident within the scheme.

Secondly, the linear space responds to present & anticipated future walking routes (potential popular future activity amongst residents due to the site's location, views, & proximity to Alma Woods). This aims to attract future & existing residents into the space - for their everyday and recreational journeys - thus achieving high usage & safer environment.

Thirdly, shared space streets & narrowed portions of the loop road create numerous possibilities for residents to move from the loop road, on the periphery of the site, into and across the shared recreational space in the centre. From the outset, this achieves safer pedestrian movement due to the design's prioritising of people.

Finally, the design of the space itself achieves a sense of openness due to its proportions, and yet critically has a density of use that makes the 'heart' of the scheme lively and animated.

***There is also the opportunity to provide a more direct route to Alma Woods that is green, attractive links into the wider 'Reconnecting Grantham to its Heritage' project that the Woodland Trust and National Trust are promoting through Heritage Lottery funding.***

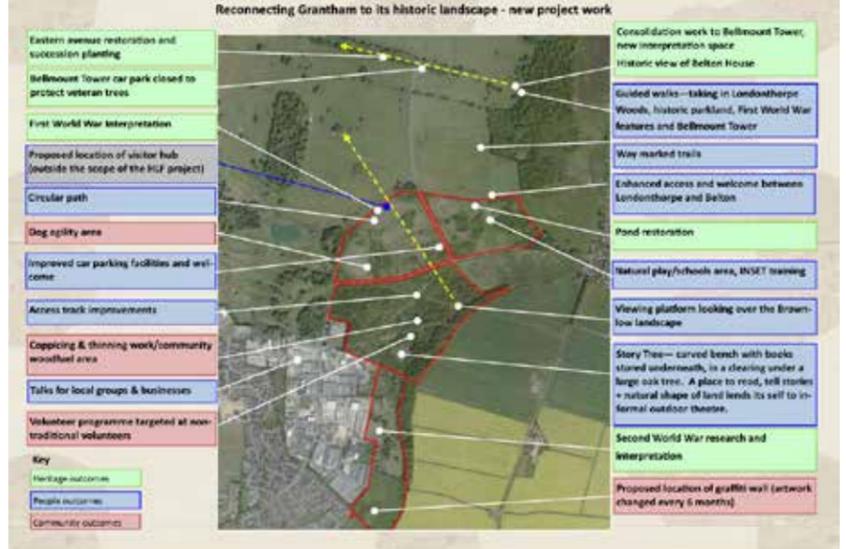
Initial conversations have been held with Ian Froggatt at the Woodland Trust regarding the creation of sustainable footpaths to the woods, along with tree planting should an application be approved.



The National Trust and the Woodland Trust, supported by National Lottery Players through the National Lottery Heritage Fund are working together to reconnect Grantham to its historic landscape. A key part of this is through interventions in Alma Park

Opportunity for improved connections, actively overlooked to reduce anti-social behaviour

Opportunity for funding to use 'left over' open space owned by SKDC





PROPOSALS AT HARROWBY

# Transport, Access and Parking

Curtins Consulting has played a key role in the evolution of the masterplan proposals to ensure that the transport, access and parking solutions to the site are deliverable. The site is highly sustainable offering a wide range of sustainable transport choices expected trip generation of the development is expected to be negligible on the local highway network.

## Access and Highways Layout

Site access will be located on Harrowby Lane and to consist of a simple priority junction with 2.4m x 43m visibility splay as set out in Manual for Streets. To accommodate the access junction and to reflect the definable change in characteristic of Harrowby Lane, the 30mph speed limit is to be extended past the site. This will also aid road safety.

The highway layout within the site has been developed to make vulnerable road users the priority through the use of shared surface areas, speed plateaus at all junctions and the use of off road paths throughout the site and linking to adjoining areas;

The site is permeable for pedestrians and cyclists allowing movement towards the Fifth Avenue area and towards the open country through rather than around the site.

## Parking Strategy

Many of the new dwellings will be served with on plot parking generally located to the side, front or rear of the dwelling. Parking spaces and garages will be sited so that there is sufficient room for users to enter and exit the vehicle. The distance from the car parking space to the home will be kept to a minimum and will be level or gently sloping. Disabled parking and cycling parking numbers will be provided in accordance with the appropriate standards.

## Traffic Generation

Traffic generation from the expected level of development would be x 2 way vehicle trips in the morning peak and x 2 way vehicle trips in the evening peak. This level of traffic generation would have no significant effect on local highway capacity.

## Servicing and Refuse Collection

The masterplan layout and highways design has been reviewed at a strategic level to ensure that servicing and refuse collection to the properties can be adequately achieved.



The site is permeable for pedestrians and cyclists and the design developed to make vulnerable road users a priority.

Car and cycle parking will predominantly be on plot. In some areas courtyard car parking is proposed in line with best practice design principles.

New priority junction off Harrowby Lane will serve the development in line with the design requirements set out within the Manual for Streets.





# Biodiversity

The development will be able to deliver significant ecological benefit to the wider area, providing additional habitat and foraging potential for local wildlife, as well as linkages between fragmented wildlife communities.

It is anticipated that the improvements to landscape infrastructure will make a significant contribution to local wildlife habitats through the following ways:

- greatly increase the acreage devoted to planting;
- diversify the existing monotone nature of unimproved grassland;
- introduce new habitat typologies, with the introduction of wildflower meadow, standing water and associated marginal planting;
- improve now degraded elements such as over-mature and damaged boundary tree and hedge planting;
- Use a planting matrix with species indigenous to the local area, improving biodiversity;
- Create wildlife corridors between fragmented habitats, linking for example Alma Wood with the roadside verge and established hedgerow of the unclassified road south-east of the site.



Improve site-wide biodiversity, creating wildlife corridors and connecting fragmented wildlife communities

Broaden the diversity of wildlife habitats with the introduction of standing water, marginal planting and wildflower meadow

Use a palette of local native meadow, herb, shrub and tree species to improve biodiversity and reinforce local landscape character





# Drainage

PROPOSALS AT HARROWBY

The development will be able to deliver a sustainable urban drainage system, providing a suitable onsite drainage scheme as well as providing betterment to the pre-existing

## Drainage

A revised drainage strategy was prepared by Curtins in response to the LLFA comments and whilst the final drainage solution will be determined at a later stage, Lincolnshire County Council's Environment and Economy Directorate (LCC) have agreed to the principle of the drainage scheme as proposed.

The revised masterplan layout has been developed to ensure that the amount of storage can still be accommodated on site.

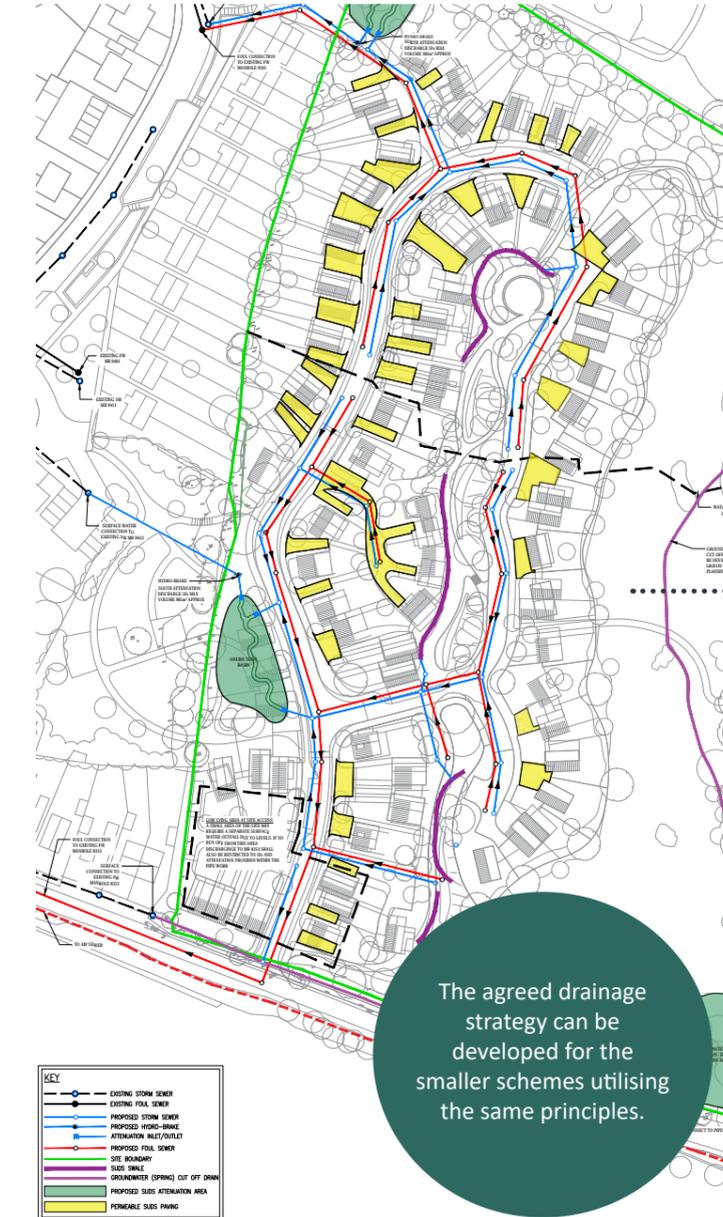
## Surface Water Design

Under the concept design, the surface water runoff and roofline drainage from the proposed development could discharge as follows:

- Provision of permeable driveways and swales as part of a sustainable drainage system (SuDS).
- Discharge rates can be restricted to Greenfield runoff rates of 5l/s/ha;
- Flow rates to be provided by installed flow restriction devices including SuDS basins and a cut off land drain across the eastern proportion of the site.

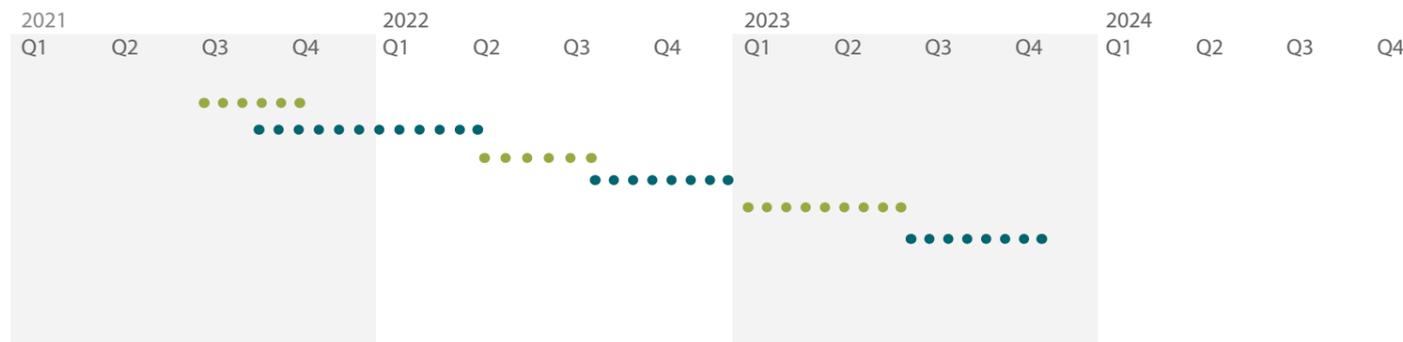
## Foul Water Drainage

There is no existing foul water drainage on site. The development is proposed to connect to public sewers in the vicinity of the site at Harrowby Lane.



# Next Steps

## A short-term deliverable site



- Local Plan Preferred Options
- Outline Planning Application
- Appoint Builder / Contractor
- Reserved Matters Application
- Start Infrastructure Works
- Finalise Development

### CONCLUSIONS

This vision document sets out how development can be delivered on the site which, following evaluation clearly represents an excellent candidate for allocation within the current planning context for the following reasons:

- » The site is available for development and can make a contribution of the district's short term land supply.
- » The site provides an extension of existing development, providing the opportunity to better integrate the existing housing to the countryside.
- » The site promotes quality housing that will meet the needs of the area and local residents.
- » Whilst there are challenges, these can be overcome through careful design and mitigation to provide a development that is a true asset to Grantham.

In short, the site has potential to deliver a well integrated, sustainable, mixed and positive residential addition to Grantham. We look therefore look forward to working with SKDC further to deliver development on the site.

### DELIVERY

In terms of delivery, an indicative programme for the development of the site is provided below. This shows that the intention is to submit and progress the necessary planning permissions in tandem with the Local Plan preparation process. The landowner has current relationships with regional and national contractors who will be appointed once the principle of development is established through an outline planning application.

The roads and infrastructure would be installed followed by a phased development. The landowner is committed to the short-term delivery of the site with the intention that the site could make an early contribution to the housing numbers required by the District.

### INVOLVEMENT

The proposal from the outset has been subject to meaningful engagement with the Council and prepared in the context of good practice guidance contained with the 2011 Localism Act, 2012 National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).

It is recognised that overall community input is key and that future matters of the approach to consultation will look to be agreed with SKDC. The design of the proposals will be discussed with key stakeholders including the Council, Grantham Civic Society, Londonthorpe and Harrowby Without Parish Council and local residents and we look forward to working with them over the coming years.

### EVIDENCE BASE

Overall, it is well established that development plans need to be; positively prepared, justified, effective and consistent with national policy. Further, in order to include sites within SKDC land supply the sites need to be deliverable and developable (paragraph 47, footnote 11).

Following on from the call for sites submission, this vision document can be seen as the first step towards demonstrating and supporting the council in meeting the above criteria. It has sought to understand the traffic and access impact, ground conditions, landscape and heritage sensitivities and drainage implications alongside and to inform the detailed masterplan. Work to date therefore that the site is deliverable and developable following a masterplanning exercise to determine site capacity. The intention to build on this document effectively building the site's evidence base, guided future discussions with future iterations produced as required.



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# Harrowby Lane Grantham Vision Document

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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

## Part A: Personal Details

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Richard	
Last Name	Cleaver	
Organisation		
Address		
Postcode		
Telephone		
Email Address		

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

## 4. Please Sign and date this form

Signature (please type for an electronic response)	Date
	21 November 2020

## Part B: Issue and Options Consultation Questions

5. Proposal 1 – 2036 Vision for South Kesteven
<b>Q1a – The Vision</b>
<b>Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?</b>

Yes		No	X	Unsure	
-----	--	----	---	--------	--

**If not please provide details.**

In the section of the proposal relating to Stamford, the sentence “The important heritage assets and green spaces will be preserved and enhanced where possible.” should have the words ‘where possible’ removed. In the last sentence of the Stamford section, what is meant by ‘services’? This needs greater definition. Public transport services, education services, primary care services, hospital services, arts & entertainment services? It should be more specific.

**Q1b – The Vision**

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?**

Yes		No		Unsure	X
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**If not please provide details.**

The vision should clearly define precisely what is meant by “sustainable”.

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

**Do you agree that the Objectives should remain the same for the new plan?**

Yes		No	X	Unsure	
-----	--	----	---	--------	--

**If not please provide details.**

Objective 7 “To make effective use of land by maximising the amount of development on [ ] sites in locations which reduce the need to travel” conflicts with Objective 4 “To strengthen the economic vitality and viability of town centres...” since Objective 4 cannot be met unless people need to travel to town centres.

Also, why is the word “sustainable” not used in relation to town centres in Objective 4, but is used in many other objectives?

The objectives should mention the role of Neighbourhood Plans.

The objectives should mention reviewing the borders of the Stamford conservation area with a view to extending them.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

Yes		No	X	Unsure	
-----	--	----	---	--------	--

**If not please provide details.**

There needs to be a specific policy that no development will be permitted on any previously undeveloped land inside the Stamford conservation area (e.g. land currently used as allotments).

Policy H1 should not be modified to increase housing allocations for Stamford.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

Yes	X	No		Unsure	
-----	---	----	--	--------	--

**If not please provide details**

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

Yes		No		Unsure	X
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**If not, please provide details of what changes you think should be made.**

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

Yes		No		Unsure	X
-----	--	----	--	--------	---

**If not, please provide details of what changes you think should be made.**

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

Yes	X	No		Unsure	
<b>If so, please outline any suitable and deliverable proposals.</b>					

<b>10. Proposal 6 – Housing Need and Requirement</b>					
<b>Q6 – Housing Need and Requirement</b>					
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?					
Yes		No		Unsure	X
<b>If not, what evidence do you have to justify an alternative need and requirement?</b>					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
Do you agree that Grantham should remain as the focus for growth in South Kesteven?					
Yes	X	No		Unsure	
<b>If not, please provide details and any alternative proposals.</b>					
Yes. And the vast bulk of the additional homes required in the district between should be provided by completing the two large new developments in Grantham by 2041. This will prevent over-development elsewhere in the district, especially in Stamford.					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?					
Yes		No	X	Unsure	
<b>If not, please provide details and any alternative proposals.</b>					
Stamford should not be a focus for growth beyond the levels planned for 2036. The existing plan means building up to its borders on almost every side, leaving only three potential sites left. These should remain green and be protected.					

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	X
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If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	X
-----	--	----	--	--------	---

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If yes, please provide details.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

--

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

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### 14. Proposal 10 – Climate Change

#### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

References to climate change should be strengthened. There should be a commitment to eliminating climate change and zero carbon emissions, instead of statements like 'minimising the effects of climate change' (as stated in SD1).

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	X
-----	--	----	--	--------	---

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	X
-----	--	----	--	--------	---

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

No.

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	X
-----	--	----	--	--------	---

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No	X	Unsure	
-----	--	----	---	--------	--

Please give details

Future car use is too difficult to predict.

#### 18. Any other Comments

##### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

In summary,

- Stamford's housing allocation should remain frozen at the 2036 level.
- All remaining unallocated green land within its boundaries should be fully protected from development.
- The lion's share of the additional 4400 homes in the district should be provided by completing the Spitalgate & Prince William of Gloucester developments by 2041

#### Part C: Sustainability Appraisal Scoping Report

#### 19. Comments about the Sustainability Appraisal Scoping Report

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0090

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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name		David
Last Name		Henry
Organisation	Burghley House Preservation Trust Limited	Savills (UK) Ltd
Address	██████████	██████████ ████████████████████ ██████████
Postcode		██████████
Telephone		
Email Address		████████████████████

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

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**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	23/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	✓	No		Unsure	
If not please provide details.					
<p>Yes, the Vision for the Local Plan reflects the spatial strategy and existing allocations across the District.</p> <p>This could be updated if required, in respect of relevant allocations in the emerging Local Plan.</p>					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	✓	No		Unsure	
If not please provide details.					
<p>The Vision is currently refers to the three overarching objectives of the sustainable development: the economic objective, social objective and environmental objective.</p> <p>Whilst climate change and recovery of the economy is not specifically referenced within the Vision, aspirations to support the local economy are mentioned whilst also noting the need to have a sustainable approach to travel.</p> <p>Additional reference could be made to climate change if the Council so desired.</p>					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	✓	No		Unsure	
If not please provide details.					
<p>There are 15 detailed objectives in the adopted Local Plan.</p> <ul style="list-style-type: none"> <li>• 9 relate to economic objectives</li> <li>• 2 relate to social objectives</li> <li>• 4 relate to environmental objectives</li> </ul> <p>All of these objectives are considered to be relevant to the emerging Local Plan and do not necessarily need to be amended unless the Council so desired.</p>					

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

Yes		No		Unsure	✓
-----	--	----	--	--------	---

**If not please provide details.**

**Policy STM1-H1**

It is understood that the Council is required to significantly increase the amount of housing it is to plan for across the plan period. As such we would strongly urge Council to not amend existing site allocation at Stamford North (Policy STM1-H1) to enable the site to come forward as intended and assist the Council is demonstrating housing delivery across the plan period.

**Possible Changes**

It is noted Proposal 3 within the Consultation Document that the Council does not propose to “change significantly” a long list of policies. Whilst it is noted at paragraph 3.2 that ‘...*some minor changes may be required to reflect national policy or guidance or to enhance their operation*’. Without the detail of such suggested amendments and the supporting evidence base it is difficult to comment at this stage about whether all policies listed should be retained without significant changes.

It is noted, via its absence from the list, that the Council does intend to amend:

- Policy SP1 – Spatial Strategy
- Policy SP2 – Settlement hierarchy

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

Yes	✓	No		Unsure	
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**If not please provide details**

Local Plans should plan for a minimum of 15 years. It is proposed that the Council extends the plan period by 5 years from 2036 to 2041 to accommodate this.

Provided that the emerging Local Plan is adopted by 2025, a plan which sets out policies for the period to 2041 would be an acceptable plan period.

It is however noted at page 16 of the Consultation Document that that Council intends for the plan period to start at 2018. It is considered that the start of the plan period should reflect the base date for the calculation of the local housing need informing the Local Plan, i.e. 2020 and not 2018.

## 9. Proposal 5 – Settlement Hierarchy

### Q5a – Settlement Hierarchy

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

It is noted within the Consultation Document that the Council is required to plan for a significant increase in housing development across the emerging plan period. At the time of writing the Council has set out that it intends to use the existing Settlement Hierarchy as a basis for determining the spatial distribution of growth within the emerging Local Plan review. This general approach to distributing new homes to more sustainable settlements has been found to be acceptable and could therefore be legitimately taken forward as part as a starting point for the new Local Plan. However we must stress the importance of the Local Plan being based upon robust evidence and be in accordance with the requirements of the National Planning Policy Framework.

### Q5b – Settlement Hierarchy Methodology

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

No answer is provided in response to this question.

### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	--------------------------

If so, please outline any suitable and deliverable proposals.

No answer is provided in response to this question.

## 10. Proposal 6 – Housing Need and Requirement

### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	✓	No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

It is reiterated that the calculation of local housing need provided by the Government is intended to be a 'minimum' requirement, as such the Council should consider as part of the evidence base whether it would be necessary to increase the amount of homes planned for across the District.

Support is given to the Council's intention to continually review the local housing need in line with any revisions to the methodology published by the Government and/ or updated statistical inputs.

## 11. Proposal 7 – Distribution of Growth

### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

No answer is provided in response to this question.

### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	✓	No		Unsure	
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If not, please provide details and any alternative proposals.

It is noted at page 16 of the Consultation Document that that Council intends for the plan period to start at 2018. It is considered that the start of the plan period should reflect the base date for the calculation of the local housing need informing the Local Plan, i.e. 2020 not 2018.

It is noted that the Council intends to roll forward existing allocations at Stamford, including Stamford North (STM1-H1) which will make a substantial contribution to the housing trajectory. Strong support is given to the retention of this policy in the emerging Local Plan.

Thorough consideration will need to be given to the acceptability of any new proposed allocations in reference to the Council's supporting evidence base. Consideration should also be given to the future movement strategy across Stamford.

Consideration should also be given to the potential for new/ revised Neighbourhood Plans to also identify sites for development.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

Thorough consideration will need to be given to the acceptability of any new proposed allocations in reference to the Council’s supporting evidence base.

Consideration should also be given to the potential for new/ revised Neighbourhood Plans to also identify sites for development.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

Thorough consideration will need to be given to the acceptability of any new proposed allocations in reference to the Council’s supporting evidence base.

Consideration should also be given to the potential for new/ revised Neighbourhood Plans to also identify sites for development.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	✓	No		Unsure	
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Please provide details

Consideration of the market and expected delivery at sites is an important consideration which should form part of the Council’s evidence base. It should play a factor in determining growth distribution but should be balanced with the ability for the market to change.

The timing of when this evidence is considered will be important, particularly if there are to be future implications of the current Covid 19 situation. At present the Government has implemented a number of measures to support the housing market. It is something that should be monitored during the plan preparation process as the market is likely to change.

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
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If yes, please provide details.

No answer is provided to this question.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

No answer is provided to this question.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

No answer is provided to this question.

**14. Proposal 10 – Climate Change****Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	✓
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

The Local Plan plays an important role in planning for the future of an area. Whilst support is given to the Council to consider the potential for more robust requirements an appropriate evidence must be provided to ensure such policies would be feasible across the District. Crucially, appropriate consideration must be given to the viability implications of such a policy.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	✓
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#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	✓
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Please give details.

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#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

It is feasible to assume that higher energy performance requirements add to build costs of proposals, particularly where they exceed building regulation requirements. It is the Council's requirement to appropriately consider and robustly justify the viability considerations of all policies within the emerging Local Plan.

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

No answer is provided to this question.

### 17. Proposal 13 – Parking Standards

#### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	✓
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**Please give details**

It is noted that South Kesteven District acknowledges the climate emergency. Planning for minimum parking standards could lead to an over provision of parking spaces when development is considered in the context of the extent of the plan period to 2041.

Support is however provided to specific requirements for electric charging vehicle points.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

It is noted that a Sustainability Appraisal Scoping Report accompanies the Issues and Options consultation. This Scoping Report considers a range of options that will be evaluated as part of the Local Plan preparation process.

It is recognised that the Sustainability Appraisal will evolve as more detail regarding the emerging Local Plan becomes available.

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0091

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

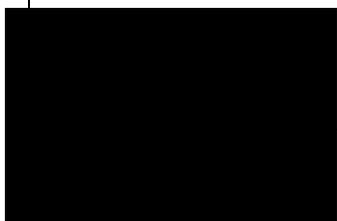
**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mr
First Name	Sophie	Steven
Last Name	Pryor	Doel
Organisation	CEG	Nexus Planning
Address	████████████████████ ████████████████████ ██████████	█ ██████████████████ ████████████████████ ██████████
Postcode	██████████	██████████
Telephone	██████████████████	██████████████████
Email Address		████████████████████████████████████████

**Please note:** that representations must be attributable to named individuals or organisations. “In confidence” representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<b>If you do not wish to be added or would like your details to be removed, then please select the following box</b>	
<i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	19 <sup>th</sup> November 2020

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**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

**Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not please provide details.**

The broad vision for South Kesteven outlined in the Issues and Options document includes, amongst things, creating the right balance of jobs, housing, services and infrastructure.

It also outlines specific aims set out for Stamford, which include supporting the local economy to develop a diverse range of employment opportunities. In terms of housing, it suggests that the town will grow through sustainable urban extensions to the north in the form of the Stamford North Extension (SNE).

CEG controls land between Empingham Road and Tinwell Road, Stamford, now known as Exeter Fields. This land is allocated under Policy E2: Strategic Employment Sites from the adopted Local Plan. It is also allocated as a mixed use urban extension under policy STM3 of the Site Allocation and Development Policies DPD (SAP DPD) for development comprising approximately 400 new homes with up to 14ha of land for employment uses.

Outline Planning permission (ref.12/0864) was granted in 2013 for “a sustainable urban extension at Stamford West including a residential development (including affordable housing) a business park (10 hectares) and a local centre, with associated highways improvements, pedestrian and cycle links, landscaping and open space”. That application was subject to a variation of condition under planning application ref. S13/2771 which allowed phased implementation of the various access points.

Reserved matters followed for the residential element in 2015 and that part of the scheme has now been built out.

As set out in more detail elsewhere in these representations, CEG fully supports the strategic aim of delivering the right balance of jobs, housing, services and infrastructure. However, having regard to the employment needs set out within relevant parts of the evidence base, the need for housing and issues associated with supply (including the SNE) CEG considers that the remaining part of the Exeter Fields allocation should be allocated for a revised mix which reduces the quantum of employment floorspace, provides greater flexibility in terms of uses and provides for much needed residential dwellings.

We include a Masterplan ref. SK004 rev A at Appendix 1 which shows a mixed use scheme comprising an additional 136 residential units as well as employment generating uses including an innovation centre (albeit this could also be used as office space), public house, hotel, care home and local centre. We set out the detailed justification for that change under the relevant questions below.

### Q1b – The Vision

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details.

As set out in more detail elsewhere in these representations, CEG fully supports the need for the emerging Local Plan to aid in the economic recovery of the District, particularly following the very significant economic downturn experienced following the Covid-19 pandemic. However, it is important that in doing so the emerging Plan reflects the very real changes in working practices that were evident before the pandemic and are all the more apparent now. That does of course include a greater degree of flexible / home working. With those changes comes a shift in demand for employment floor space. CEG considers that these changes (amongst other important considerations) should be taken into account when preparing the Plan. As a result of that, as well as other significant considerations set out in more detail in response to question 9 below, the mix of uses at the Stamford West allocation should be amended.

### 6. Proposal 2 - Objectives

#### Q2 – Objectives

Do you agree that the Objectives should remain the same for the new plan?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details.

The various “Proposal 2 Objectives” set out within the Issues & Options Document and carried forward from the Local Plan include a series of individual objectives, numbered 1-9, designed to enhance prosperity.

They deal with matters such as supporting sustainable growth and diversifying the local economy. Specific measures include ensuring an adequate and appropriate supply of land and premises.

CEG supports broadly the general thrust of these objectives. However, it is clear that the Economic Prosperity objectives have had regard to relevant parts of the evidence base including the AECOM Employment Land Study (2015) (ELS) which remains the most significant up-to-date assessment of economic needs in the borough.

For the reasons set out in more detail in response to Q9 below, CEG is clear that the Council has over-allocated land to meet employment needs. Set against that is a clear need for additional housing land and that as a consequence, the allocation of land at Exeter Fields should be revised to include a reduced quantum of employment floor space (but space which is used more effectively) and the allocation of land for housing.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not please provide details.**

It is noted that Policy E2: Strategic Employment Sites is among the list of policies not proposed to be changed significantly. For the reasons set out in more detail in the response to Question 9 of this document, CEG considers that Policy E2 should be amended in so far as it relates to the land at Exeter Fields to provide a reduced quantum of employment floorspace with the remainder of that land given over to housing.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

No Comment

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not, please provide details of what changes you think should be made.**

No Comment

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**If not, please provide details of what changes you think should be made.**

No Comment

### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
-----	--	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

No Comment

### 10. Proposal 6 – Housing Need and Requirement

#### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

CEG is aware that the housing requirement of 754 dwellings per annum for South Kesteven has been derived using the Government's standard methodology. As a general point, the Council will be aware that the Government's proposed changes to the standard methodology have now been published and it is noted that the proposed changes would see a significant increase in the housing requirement for South Kesteven from 754 to 839 new dwellings. However, it is accepted that the proposed changes have not been adopted and as such, the Council's proposed figure of 754 dwellings is correct at the current time.

In any event, the Issues and Options Document notes, quite rightly, at Paragraph 4.16 that this Local Housing Need Figure should be a minimum and that any needs that cannot be met by adjoining authorities should be planned for. The Council suggests that it is not planning for any unmet needs at this time, but this position will be kept under review in accordance with the Duty to Cooperate as per the NPPF at Paragraphs 24-27.

The Council does however suggest that an urban extension at Stamford North, falling partly within the jurisdiction of Rutland County Council (where it is known as Quarry Farm), would deliver homes that count towards the needs of South Kesteven. Allocated within the adopted Local Plan under Policy ref. STM1-H1: Stamford North, the site has an indicative capacity of 1,300 dwellings. CEG retains fundamental concerns about the deliverability of this site over the medium term as well as a number of the other allocations relied upon in the adopted Local Plan, as set out in more detail below.

#### Stamford North

Regrettably, the Council has not published an up-to-date housing trajectory which sets out, site by site, the projected delivery rates over the plan period. The most recent documentation which demonstrates this is the 2015 SHLAA update and these projections are now 5 years out of date.

However, the site at Stamford North is allocated in the Local Plan which was adopted as recently as January 2020. Even at that time the Council was anticipating a significant delay in the delivery of housing from this site when it states at Paragraph 3.30 that:

*“The proposed northern allocation will provide a comprehensive sustainable urban extension to the town, however this will happen over a number of years and therefore it will be some time before housing completions are achieved. In order to ensure Stamford continues to contribute to the District’s housing growth and its own need, a further allocation is proposed at Stamford East (STM1:H2). This proposal makes best use of previously developed land and seeks to ensure two parcels of land are bought together as one comprehensive development for the town”.*

The allocation itself outlines detailed development principles needed to accompany a planning application including a high level masterplan, a detailed development brief, appropriate full transport assessment and phasing plan for the entire site.

The Site is duly included within the draft Rutland County Council Local Plan 2018-2036 under draft policy H4 – Cross Boundary Development Opportunity – Stamford North. However, that policy makes it clear that:

*“A proposal for development of the Quarry Farm Site will only be supported where it is in accordance with an agreed Development Brief (to be supported as SPD) and as part of a single comprehensive planning application for the whole of Stamford North development area”.*

Of perhaps more significance, the draft Local Plan for Rutland was subject to consultation at Regulation 19 stage between August and November 2020 but it has not yet been submitted for examination. Thus it could be some considerable period before the Plan is actually adopted, if at all.

It is noted that a draft development brief was produced in January 2019 but it has not yet formally adopted. It is abundantly clear and accepted by all parties that the site will need to be masterplanned holistically, to include the land across district boundaries. There is currently uncertainty over whether the site will even be allocated within an adopted Local Plan for Rutland. Even if it is, allocation in an adopted Local Plan for Rutland is not imminent.

Having regard to that, we set out an indicative timeline for delivery from this site at Appendix 2. It demonstrates that the first delivery of housing from this site is not a realistic prospect until 2030 at the earliest.

### Other Strategic Allocations

As set out above, the Council has failed to produce a comprehensive and up-to-date document setting out assumed delivery rates from allocated sites. However, it is clear from Policy H1: Housing Allocations that the Council is over-reliant on large strategic sites, especially in Grantham.

For many of the same reasons set out above and within the table at Appendix 2, these large strategic sites often have long lead in times, and the delivery of housing can become delayed due to their reliance upon the delivery of associated infrastructure. Therefore the Council must diversify its housing land supply and include smaller housing site allocations so that it can continue to maintain a rolling five year housing land supply in the event that the delivery of large strategic housing sites becomes delayed.

**11. Proposal 7 – Distribution of Growth****Q7a – Focus of Housing Growth on Grantham****Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

Yes

No

Unsure

**If not, please provide details and any alternative proposals.**

As the most sustainable location in the district it is right that Grantham should remain as the focus for housing growth in South Kesteven. However, it is clearly that case that Stamford is also a sustainable location (second only to Grantham) and is therefore a suitable location for housing growth in its own right.

The Inspector examining the now adopted Local Plan considered the options for growth at the town in light of the Stamford Capacity and Limits to Growth Study 2015. He noted at that time constraints including the Grade I Listed Burghley House and Grade II\* Burghley Park Registered Park and Garden to the south-east as well as the landscape quality and flood risk of the River Welland to the south and south-west.

As such, it was suggested that options for growth were limited to the northern parts of the town and the land at Stamford North was duly included for strategic levels of growth. However, for the reasons already set out and as per the indicative trajectory at Appendix 2, it is not realistic to expect delivery of housing from that site until 2030 at the earliest.

Whilst other parts of the town are indeed constrained, it would be entirely appropriate to amend the allocation of land at Exeter Fields, reducing the quantum of employment floorspace and allocating the remainder for housing as per the Masterplan at Appendix 1. A site of that scale would be capable of delivering within the first five years of the plan period and would ensure a more appropriate mix of sites in the Local Plan.

**Q7b – Stamford, Bourne and The Deepings****Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

Yes

No

Unsure

**If not, please provide details and any alternative proposals.**

Stamford should indeed be a focus for growth as set out in more detail above.

**Q7c – Larger Villages****Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

Yes

No

Unsure

**If not, please provide details and any alternative proposals.**

No Comment.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

No Comment.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please provide details

Both factors should be taken into consideration and in that respect, it should be noted that a revised allocation at Exeter Fields is entirely deliverable and appropriate in terms of market capacity given the delayed delivery from the Stamford North allocation and the other larger allocations in Grantham.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

No Comment.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes

No

Unsure

If not, please provide details.

As set out above, the land at Exeter Fields is allocated in the adopted Local Plan under policy E2: Strategic Employment Sites. That policy makes it clear that the allocated sites are of strategic employment importance given their relationship to principal areas of growth and their accessibility via the strategic road network.

The Council proposes to bring these allocations forward into the new local plan unmodified. In that respect, regard should be had to relevant evidence regarding employment needs. In this instance the AECOM Employment Land Study (ELS) from 2015 remains relevant. Albeit that document, at five years old, is clearly now very dated and CEG considers that an updated document should be prepared as a priority. However, reference is made to that document where appropriate below.

#### Need for Employment Land

Paragraph 6.13 of the ELS concludes that there is a need for between 46.7ha and 79.1ha of industrial land over the period 2015-2036. However, it goes on to point out at Paragraph 6.13 that:

*“a large proportion of the net additional land requirement for industrial/storage could be met through the permissions which have consent but which have yet to be implemented”.*

In terms of office space, at paragraph 7.2m it makes the point that:

*“office demand has remained steady in South Kesteven with little growth in the market”*

The previous Local Plan Inspector in connection with the adopted Local Plan for South Kesteven picks up on this point at Paragraph 43 of his Report (Appendix 3), making reference to the ELS requirement for additional employment land, but going on to point out that the now adopted Local Plan would provide effectively double that requirement at 155 hectares. Thus the adopted Local Plan sufficiently over-allocates land at South Kesteven for employment.

The Inspector goes on to set out his reasons for finding that approach sound at Paragraph 44 of his Report, including:

- The ELS pre-dates more up-to-date information in the LEP Strategic Economic Plan to 2030 and future growth potential referred to within the Council’s Managed Workspace Report from 2016;
- the ELS is relatively cautious given that South Kesteven is considered well placed to accommodate a shift to larger logistic and warehouse operations;
- a pause in the examination to produce updated evidence would not take a considerable period of time.

However, in accepting that approach, the Inspector made it clear that an early review of the Local Plan is required which is informed by and responds to updated evidence in connection with employment needs.

It would appear that this updated evidence is still not available.

#### The Amount of Employment Floorspace at Exeter Fields

In connection with the Exeter Fields allocation, the Inspector Comments at Paragraphs 168 -169 of his Report that:

*“Elsewhere at Stamford, the plan allocates just under 10ha of employment land to the west of the town at Exeter Fields. This is an allocation rolled forward from the 2014 Site Allocations & Policies Plan and remains undeveloped. The site benefits from planning permission and has been the subject of ongoing dialogue between the landowners and the Council [EX/SKDC/35]. The site has a reasonable profile to the adjacent A1 and is suitably located on the western side of the town to avoid commercial traffic travelling through the town. The evidence in the SCLGS is reasonable in that alternative directions of growth to the north and east would be unsuitable for employment development. Having in mind the test at paragraph 22 of the NPPF there remains a sufficiently demonstrable prospect of the site being used for employment use.*

*Given the extensive residential development proposed in Stamford over the plan period and the evidence from InvestSK and others that a lack of reasonable alternative sites for expansion/modernisation may have been a contributory factor to the loss of a number of businesses in town it would not make sense to significantly reduce the one high quality greenfield employment site on the right side of town if Stamford is to flourish as a balanced community. As set out above, the district-wide over-allocation of employment land arises because of the potential to establish a sub-regional strategic employment site at Grantham. There is no persuasive evidence that the Grantham Southern Gateway (some 22 miles north of Stamford) dilutes the potential of Exeter Fields which is positioned in a part of the District where the dynamic is more towards Peterborough as a sub-regional economic hub. Overall, the Exeter Fields allocation in the plan is soundly-based”.*

The proposal to carry forward the site allocation for Exeter Fields as part of this Local Plan Review has not been informed by the updated evidence envisaged by the Inspector. The ELS was criticised as being “of some vintage” by the Local Plan Inspector, even at that time given that it draws upon data from 2005-12. It does therefore very much pre-date the demonstrable change in working practices that have been evident since 2012 and exacerbated by the current Covid -19 pandemic. Namely, a shift to more flexible working, a greater degree of home working and with it a reduced requirement for traditional employment floorspace – certainly in the same quantities as before. Points noted within the Sustainability Appraisal for the Local Plan Review at Page 29 when it states that:

*“the ongoing effects of the Covid-19 pandemic have the potential to continue to affect travel patterns, including linked to increased levels of working from home and limitation of traffic at peak times”*

The CEG proposal is for a rebalancing of the allocation at Exeter Fields, with a reduction in the employment allocation from 10ha to circa 4ha with the remainder given over to housing. Clearly the Inspector was not averse to a rebalancing of the allocation but felt at that time that it should not be reduced *significantly*.

Whilst the Council has not published updated evidence underpinning the continued need for employment allocations in the Local Plan Review, CEG has undertaken extensive marketing in connection with the Exeter Fields site. As set out in the supporting information at Appendix 4 the site has been actively marketed for employment purposes for some considerable period of time. A summary of enquiries has been compiled and it shows a series of largely speculative enquiries in connection with alternative uses. Where there has been some demand for B1 and B8 uses this has been at a very small level and not enough to demonstrate there would be enough take up for the whole of the back of the site.

Furthermore, discussions with commercial agents have made it clear that small scale local retail, and road frontage uses are faring better than office developments, which had experienced a decline in demand for many out of town locations prior to the pandemic but that trend has now been exacerbated.

Given that, it is unquestionably the case that the existing employment allocation of 10 hectares is simply in excess of what the market could realistically support in this location. The allocation on this scale was derived from a desire to meet the total requirement for employment land at Stamford of 24 hectares (as expressed through the Core Strategy) rather than seeking an appropriate and marketable balance between residential and business uses on this site. It is firmly the view of CEG that a reduced allocation of around 4 hectares would be both achievable and directly related to the delivery of high quality employment uses on the Empingham Road frontage.

The NPPF at Paragraph 120 is clear that land which is allocated for employment purposes should be regularly reviewed when it states that:

*“Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:*

- a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and*

Clearly the allocated quantum of employment floorspace will not be delivered as originally envisaged. An allocation of 4ha is considered to be deliverable, the remaining 6ha of the site would thus be available for much needed residential development, including affordable housing. In that respect, it is abundantly clear that the adopted Local Plan contains a series of strategic scale residential allocations (proposed to be brought forward unchanged) which as demonstrated are highly unlikely to deliver quickly, if at all. As such there is a clear need for additional residential development within the Plan and at Stamford more specifically.

Given the subsequent change in circumstances, the adjustment proposed and as set out on the accompanying masterplan ref. is considered to be entirely justified.

#### **The Need for Additional Flexibility**

In addition to a change in the overall quantum of employment floorspace referred to above, the NPPF also outlines that an element of flexibility should be applied to the use of employment floorspace when it outlines at paragraph 81d) that local planning policies should:

*“be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live work accommodation); and to enable a rapid response to changes in economic circumstances”.*

The site allocation policies E2: Strategic Employment Sites and E3: Employment Allocations outline a presumption in favour of development falling within use classes B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution). Other employment generating uses outside of B-use classes *“may also be appropriate and will be considered where the promoter actively engages with the Council and an end-user for the proposal”.*

Notwithstanding that caveat, CEG retains concerns that the site allocation policies simply are not sufficiently flexible, contrary to relevant national guidance where it seeks a rapid response to changing circumstances.

In connection with Exeter Fields, the Inspector concluded that the site has a *“reasonable profile”* adjacent to the A1, whilst other options for growth at Stamford were classed as inferior. Given the wider expectation that South Kesteven will see significant growth of logistics and warehouse operations generally, it is clear that they are the uses envisaged here.

The Exeter Fields site may indeed have a *“reasonable profile”* adjacent to the A1, but Stamford fundamentally is a less attractive and thus inferior location for employment growth, particularly in terms of logistics and warehousing, than Grantham. Grantham is a larger and more sustainable settlement with an accompanying labour pool. Indeed the Sustainability Appraisal for the South Kesteven Review makes it clear that Grantham contains the most comprehensive range of services, facilities and employment opportunities in the District as well as public transport links. It is comfortably the most accessible location for the labour force as well as the operation of such activities.

The wider geographical context of South Kesteven and its access to the strategic road network may render it suitable for warehousing and logistics uses as a matter of principle. However, given the very nature of such activities and the hours of operation, such uses are not appropriate in residential areas. These uses are, for very good reasons, confined to relatively remote locations on the edge of settlements away from neighbouring residential areas.

The remaining land at Exeter Fields is now adjacent to existing residential development and thus more sympathetic employment generating uses will be required. In that respect, the accompanying Masterplan shows how range of alternative employment generating uses could be accommodated including an innovation centre (which could be used as office space), public house, hotel, care home and local centre. We set out the detailed justification for that change under the relevant questions below.

It should also be noted that development at Exeter Fields, particularly along the Empingham Road frontage, can help to define and provide a landmark to the point of entry to Stamford, an objective which is unlikely to be achieved solely by a B class development and most certainly by the bulky and unattractive structures associated with warehousing and logistics.

Given the limitation of the site and Stamford more generally, and the appropriateness of development within B-uses at this site in particular, it is clear that much greater flexibility should be built into the site allocation policy so that the remaining employment floorspace can accommodate a range of other employment generating uses.

**Conclusion**

CEG very much retains the aspiration of delivering high quality employment development at Exeter Fields. However, that development must be of a scale which is appropriate for the site's location and limitations, whilst responding to changing circumstances including clear marketing evidence regarding deliverability.

Furthermore, the use of that retained employment land must be given an element of flexibility, as required by national policy, to reflect the very real change in economic circumstances and the disadvantages associated with B-class development in this location.

Additionally, to maintain a rolling five year land supply, the Council must take this opportunity to diversify its supply to include smaller housing site that can deliver quickly and within the first five years of the new Local Plan.

For all these reasons, the Council should re-consider Policy STM3 of the adopted Site Allocations and Policies DPD / E2 of the adopted Local Plan for a mixed use urban extension at the site now known as Exeter Fields, to reduce the scale of the business park element from 10 hectares to 4 hectares, and provide an additional 6 hectares for residential development.

Yes

No

Unsure

If not, please provide details.

No Comment

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes

No

Unsure

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

No Comment.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?					
Yes		No		Unsure	
Please give details.					
No Comment					
<b>Q11c – Viability Implications of Higher Energy Performance Standards</b>					
If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?					
Please give details					
No Comment					

<b>16. Proposal 12 – Need for Caravan Accommodation</b>					
<b>Q12 – Need for Caravan Accommodation</b>					
Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.					
Yes		No		Unsure	
Please give details					
No Comment					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.					
Yes		No		Unsure	
Please give details					

No Comment

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

No Comment

**Part C: Sustainability Appraisal Scoping Report**

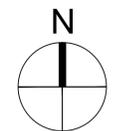
**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

## **Appendix 1 - Masterplan ref. SK004**

Contractors are not to scale dimensions from this drawing

-  Site Boundary
-  Innovation Centre
-  Public House
-  Hotel
-  Care Home
-  Residential
-  Local Centre
-  Open space



No	Primary Use	Planing Use	Site Area shown (Ha/Acre)	ResUnits/Building Area Gfa in sqm	Parking Shown	Number of Storeys
1	Innovation Centre	B1 (b)	0.48 ha (1.20 acres)	2300 sqm	70	2
2	Public house	A4	0.34 ha (0.85 acres)	550 sqm	50	1 & 2
3	Hotel	C1	0.50 ha (1.25 acres)	3120 sqm (80 keys)	80	3
4	Care Home	C2	0.93 ha (2.3 acres)	5,000 sqm (80 Person)	30	2
	Cottages			12 units		2
5	Local Centre					2&3
	Flats above	C3		16 units	12	
	Foodstore	A1		460 sqm	30	
	Retail units	A1, A2, A3, A5		350 sqm	15	
	Residential (Houses)	C3	0.73 ha (1.8 acres)	16 units	34	2&3
	Public Open Space		0.06 ha (0.14 acres)			
6	Mixed use					
	Residential (houses)	C3		12 units	22	2&3
	Flats above	C3		4 units	2	2
	Shop/retail units	A1,A2,A3,A5	0.32 ha (0.8 acres)	187 sqm	2	1
7	Residential	C3	0.78 ha (1.92 acres)	25 units	as req	2
8	Residential	C3	0.57 ha (1.4 acres)	19 units	as req	2
9	Residential	C3			as req	2
10	Residential	C3	1.53 ha ( acres)	49 units	as req	2
11	Residential	C3	0.56 ha (1.38 acres)	18 units	as req	2
12	Residential	C3	0.76 ha (1.9 acres)	25 units	as req	2
13	Public Open Space		1.03 ha (2.54acres)			

Total residential units local centre -		48 units. Pos required @56 sqm	0.2688 ha
New 12 units within Care Home plot		12 units. Pos required @40 sqm	0.048 ha
<b>Total new residential units - (from employment to residential)</b>		<b>136 units. Pos required @56 sqm</b>	<b>0.7616 ha</b>
Total new POS required			1.0784 ha
Total new POS provided			1.09 ha

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Client  
**Commercial Estates Group**  
Project  
**Stamford West**

Description  
**Employment to Residential  
Illustrative Layout sketch**

Status  
**DRAFT**  
Scale 1:10000@A1 AG  
Job number 31450-1  
Drawing number SK004  
Date Nov 20  
Revision A

## **Appendix 2 – Indicative Timeline for Delivery at Stamford North**



# Stamford North

## Indicative Trajectory

		Timing by Quarter																																										
		2020				2021				2022				2023				2024				2025				2026				2027				2028				2029				2030		
Task	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3	4	1	2	3								
Likely adoption of Rutland Local Plan																																												
Adoption of development Brief SPD																																												
Submit Outline planning application																																												



**Appendix 3 – Report on the Examination of the South Kesteven Local Plan  
2011-2036**



The Planning Inspectorate

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# Report to South Kesteven District Council

by David Spencer BA(Hons) DipTP MRTPI

an Inspector appointed by the Secretary of State

Date: 6 January 2020

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

## Report on the Examination of the South Kesteven Local Plan 2011-2036

The Plan was submitted for examination on 15 January 2019

The examination hearings were held between 8 and 30 May 2019

File Ref: PINS/E2530/429/7

## Abbreviations used in this report

AA	Appropriate Assessment
BHPSS	Belton House and Park Setting Study
DIO	Defence Infrastructure Organisation
Dpa	Dwellings per annum
DtC	Duty to Co-operate
ECML	East Coast Main Line
EEFM	East of England Forecasting Model
ELS	Employment Land Study
GCLGS	Grantham Capacity and Limits to Growth Study
GLNP	Greater Lincolnshire Nature Partnership
GSRR	Grantham Southern Relief Road
GTAA	Gypsy & Traveller Accommodation Assessment
HIA	Heritage Impact Assessment
HIF	Housing Infrastructure Fund
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
LCC	Lincolnshire County Council
LDS	Local Development Scheme
LEP	Local Enterprise Partnership
LHN	Local Housing Need (as per standard methodology)
MM	Main Modification
MOU	Memorandum of Understanding
NPPF	National Planning Policy Framework
NWQ	North West Quadrant
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PWOGB	Prince William of Gloucester Barracks
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SCLGS	Stamford Capacity and Limits to Growth Study
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document
SuDS	Sustainable Drainage Systems
WFD	Water Framework Directive

## Non-Technical Summary

This report concludes that the South Kesteven Local Plan 2011-2036 provides an appropriate basis for the planning of the District provided that a number of main modifications (MMs) are made to it. South Kesteven District Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases, I have amended their detailed wording where necessary. I have recommended the inclusion of the MMs in the plan after considering all the representations made in response to consultation on them.

The main modifications can be summarised as follows:

- Increasing the objectively assessed need (OAN) for housing from 625 dwellings per annum (dpa) to 650dpa to more appropriately respond to market signals. The revised OAN will apply from 2016/17 onwards.
- A revised housing trajectory to reflect the following:
  - (i) the amended OAN;
  - (ii) earlier delivery on a number of the allocated sites;
  - (iii) increased capacities at Wilsford Lane North - Ancaster, Low Road - Barrowby and Linchfield Road - The Deepings;
  - (iv) increased supply within the plan period at Prince William of Gloucester Barracks allocation in Grantham from 500 homes to 1,775 homes including a deliverable supply of 175 homes by 2023/4;
  - (v) the re-allocation of employment land at Manning Road, Bourne; and
  - (vi) application of the 'Liverpool' method in addressing the shortfall since 2011.
- Site-specific policy content for the strategic employment site at the Southern Gateway, Grantham and the enlargement of the allocation from c.106ha to c.119ha.
- A policy commitment to undertake an early plan review to address, amongst other things: (i) latest needs of gypsies and travellers; and (ii) an updated assessment of employment land requirements; and (iii) changing circumstances in local housing need.
- A separate, lower affordable housing requirement (20%) on qualifying sites within a defined Grantham Urban Area, to better reflect viability evidence.
- A range of other alterations necessary to ensure the plan is positively prepared, effective, justified and consistent with national policy.

## Introduction

1. This report contains my assessment of the South Kesteven Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. The revised National Planning Policy Framework was published in July 2018 and updated in February 2019. It includes a transitional arrangement in paragraph 214 whereby, for the purpose of examining this Plan, the policies in the 2012 Framework will apply. Unless stated otherwise, references in this report are to the 2012 Framework.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The South Kesteven Local Plan 2011-2036 submitted on 15 January 2019 is the basis for my examination. It is the same document as was published for pre-submission consultation in June 2018.

### Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form MM1, MM2, MM3 etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this context, I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alter the content of the modifications as published for consultation or undermine the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

### Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as South Kesteven Proposed Submission Local Plan 2011-2036 District Policies Map and Inset Policies Maps as set out in examination documents CD1b and CD1c.

6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
7. These further changes to the policies map were published for consultation alongside the MMs as the 'Schedule of Proposed Policies Map Modifications' (September 2019). When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the 'Schedule of Proposed Policies Map Modifications' published alongside the MMs.

#### Habitats Regulations

8. On submission the plan was accompanied by a Habitats Regulations Assessment (HRA) screening report. This concluded that the policies and proposals of the Plan, in combination with other relevant plans and projects, would not result in a likely significant effect on any protected European sites both within the District as well as within a 15-kilometre radius from its boundaries. There was no objection to this approach or these conclusions, including from Natural England.
9. In light of the 2018 judgement of the Court of Justice of the European Union in the case of *People Over Wind, Peter Sweetman v. Coillte Teoranta*, the submitted HRA screening report required further clarity on whether or not mitigation had been factored into the screening stage to reach the conclusion of no likely significant effect. In April 2019 the Council produced a comprehensive update of its HRA report [EX/SKDC/23] including a revised screening that likely significant effects relating to recreational pressure on Rutland Water Special Protection Area (SPA) and Barnack Hills and Holes Special Area of Conservation (SAC) and issues of water quality more generally could not be unequivocally ruled out. Given the uncertainty a more precautionary approach was adopted. This resulted in an appropriate assessment of a small number of district-wide policies and those plan proposals at Stamford and Langtoft proximate to the SPA and SAC.
10. The more detailed appropriate assessment, having regard to existing measures to avoid and mitigate effects from recreational pressure and water quality, identifies that there is not a requirement for specific mitigation to be embedded in the plan. As such the updated HRA has been able to draw a conclusion that the policies and proposals of the Plan, either alone or in combination with other plans and projects, would not result in significant adverse effects on SPA and SAC site integrity.
11. The Greater Lincolnshire Nature Partnership (GLNP), which includes Natural England, has worked collaboratively with the Council to agree further additional text to Policy EN2, as set out in the updated HRA, so that the plan clarifies that project level appropriate assessment may be required where individual development proposals are likely to result in a significant adverse

effect on the integrity of European sites. MM34 would do this and I recommend it for effectiveness and consistency with national policy.

12. The proposed MMs have been subject to HRA and a conclusion reached that they will not have a likely significant effect on Natura 2000 sites or affect the previously reached HRA conclusions. This is endorsed by Natural England.

## Assessment of Duty to Co-operate

13. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council has complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The Council's Duty to Co-operate Statement details the strategic cross-boundary issues of relevance to the plan's preparation, including housing, jobs, provision of infrastructure, climate change and conservation/enhancement of the natural and historic environments.
14. The statement identifies the bodies with whom the Council sought to co-operate in preparing the plan, including neighbouring authorities, Local Enterprise Partnerships (LEPs) and various statutory organisations including Lincolnshire County Council (LCC), Natural England, Highways England and the Environment Agency. The statement details the engagement that has taken place and the outcomes. This includes amongst other things, the 2014 Strategic Housing Market Assessment (SHMA) for the Peterborough Sub-Region and the subsequent 2017 SHMA update.
15. The 2017 SHMA update is accompanied by a memorandum of understanding (MOU) signed in March/April 2017 by all four constituent housing market area (HMA) authorities. The MOU agrees the objectively assessed housing need for the market area and identifies that the need for each component authority can be met within its administrative area. Matters have changed since the plan was published in that Peterborough elected through their 2018 plan examination to move from OAN to the latest Local Housing Need (LHN) figure. The assertion is that there is now a consequential degree of unmet need in the HMA by virtue of Peterborough's marginally lower LHN figure.
16. A suggested update of the SHMA MOU has not been submitted; however, this is not fatal to demonstrating the required co-operation. No neighbouring HMA authority has objected that there is an unmet need that South Kesteven should address or that, following Peterborough's late change in approach, there has been a subsequent lack of co-operation on the part of South Kesteven to remedy any HMA wide housing need deficit. At a time of sanctioned transition between housing need methodologies it is conceivable that local plans within the same HMA, at varying stages of preparation/examination, may not precisely align on meeting an aggregate need. South Kesteven on submission had not deviated from the extant, signed MOU and so in this regard the duty to co-operate had been complied with.
17. A key strategic cross-boundary matter is the significant degree to which Stamford is encircled by neighbouring authorities (Rutland, East Northamptonshire and Peterborough). Reasonable options to sustainably expand the town to any appreciable degree within South Kesteven's administrative boundaries are focused to the north. Delivering land to the north of Stamford would require adjoining land in Rutland's administrative

area to enable access and a comprehensive development as part of any wider 'Stamford North' urban extension. Consequently, a development of 650 homes at Quarry Farm in Rutland is seen as part of meeting South Kesteven's housing need through a sustainable strategic urban extension to Stamford.

18. It is evident that work is well-advanced in progressing a memorandum of co-operation and a development brief for the strategic cross-boundary site at the time of plan submission. It is also clear from shared evidence bases (for example the joint Infrastructure Delivery Plan 2018) that both authorities are working co-operatively on this strategic planning matter. Rutland County Council has included land at Quarry Farm as part of the wider Stamford North proposals in two initial consultations on the emerging Rutland Local Plan (RLP). Emerging Policies RLP3 and RLP13 are unambiguous that development in this part of Rutland is a response to meeting South Kesteven's housing needs through a comprehensive strategic extension to the town.
19. In conclusion, I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

## Assessment of Soundness

### Main Issues

20. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified 8 main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Does the Plan provide the most appropriate basis for meeting **the District's housing** and employment needs in order to sustain balanced communities over the plan period, including a justified spatial strategy?

#### *Establishing housing need*

21. The latest update in the 2017 SHMA for the Peterborough HMA advises that the OAN for South Kesteven, when applying the government's 2014-based household projections, should be 625 dwellings per annum (dpa). The submitted plan recognises that under the new standard methodology the annual LHN figure for the District is projected to increase (currently 767dpa on latest 2019 basis).
22. The Peterborough Local Plan (within the same HMA) adopted a standard methodology LHN figure during its examination in 2018/19, which gave a marginally lower need compared to the SHMA's OAN. Elsewhere within the HMA, South Holland's SHMA OAN was found sound in 2019. Rutland's Local Plan has yet to be submitted and therefore will be examined against an emerging lower LHN figure. At an aggregate level housing need across the HMA when applying either the OAN or the standard methodology LHN are relatively similar at 2,209dpa and 2,259dpa respectively.
23. Meeting HMA need, by either method, relies on authorities adopting the higher component figure for their area to achieve the 2,200-2,250 targets. Based on

the figures before me, when looking at OAN, which remains the valid method for this examination, the HMA shortfall, including South Kesteven's submitted 625dpa, would be in the region of 40dpa<sup>1</sup>. This is a relatively modest figure and to be regarded as an acceptable consequence of the transitional arrangements. It is not necessary for soundness that this plan adopts either the higher standard methodology figure or a hybrid housing need figure as plans within the HMA come forward under both permissible methods for assessing housing need.

24. The approach in the plan to address the gap between the lower OAN figure and the emerging higher standard methodology figure is to boost the supply of housing land. Whilst this is a sound approach, it is evident on current figures that the degree of difference between the SHMA's OAN and the standard methodology figures is most pronounced in South Kesteven compared to other HMA authorities. Against this context, paragraph 153 of the NPPF advises that plan review (either in whole or in part) can be mechanism to respond flexibly to changing circumstances. This report sets out elsewhere that there are justified reasons for an early plan review and a main modification is set out in Issue 8 below. The timing of the review would enable the Council to respond, if as currently expected, the evidence on local housing need is to change significantly. Housing Market Area
25. The original 2014 Peterborough SHMA report includes detailed analysis of house prices, migration patterns and travel-to-work (commuting) areas. Its conclusion that the best fit of the HMA to local authority boundaries comprises Peterborough, Rutland, South Holland and South Kesteven is reasonable. Whilst this analysis is of some age, there is very little to substantiate that in defining the HMA links between parts of South Kesteven and the wider Cambridge sub-regional housing market area (which also includes Peterborough) have been under-estimated. Overall, I find the HMA has been appropriately defined.

#### *Demographic Starting Point*

26. The Planning Practice Guidance (PPG) at paragraphs 2a-015 and 2a-017 is clear that household projections published by the government should provide the starting point for estimating overall housing need and should be considered statistically robust and based on nationally consistent assumptions. The PPG advises at paragraph 2a-016 that where possible, local needs assessments should be informed by the latest available data. Analysis of the 2016-based projections from the Council shows little variance from the 2014-based projections. Overall, the SHMAs assessment using the 2014-based household estimates is a sound starting point.
27. Evaluation of the household projections and applying an adjustment for vacant homes, shows an initial need for 601dpa in South Kesteven. In contrast to all other authorities in the HMA where net migration informs an appreciable upwards adjustment to the demographic starting point, analysis of the 10-year migration trends in South Kesteven reveals a decrease in housing need down to 569dpa. In an overall HMA context this decrease (32dpa) can reasonably

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<sup>1</sup> See Table at paragraph 1.2 in May 2019 update of Topic Paper 2

be described as minor and should be seen in the wider context that when adjustments are consistently made for 10-year migration data (as per South Holland's recent Inspector's Report) the overall demographic starting point for the wider HMA is notably above the 2014-based household projections. There is no persuasive evidence of notable suppression of newly forming households in the 25-44 age groups in South Kesteven. On this basis the downwards adjusted 569dpa is to be considered a sound demographic starting point.

*Adjustments to the demographic starting point*

28. The PPG at paragraph 2a-018 advises that adjustments can be made to ensure that the scale of housing being planned for provides a sufficient working age population to support economic forecasts for the area. Allied to this is the need to avoid unsustainable commuting patterns and to ensure the resilience of local businesses. The East of England Forecasting Model (EEFM) estimates a net jobs growth of 6,400 in South Kesteven over the period 2015 to 2036. Commuting ratios have been held constant and the SHMA also makes reasonable allowances for double jobbing.
29. Across the HMA the demographic projections would provide sufficient workforce growth to meet the EEFM forecast. The exception is South Kesteven where analysis in the SHMA identifies a need to uplift population growth to ensure alignment between jobs and the resident labour supply. The SHMA recommends that the uplift to housing need, when factoring-in economic activity rates, is adjusted upwards to 616dpa (Figure 3.15, p61), an increase of 47dpa. Overall, this is a considered response to the jobs growth that is reasonably expected to occur. It is also worth bearing in mind that whilst the EEFM provides a reasonable starting point on likely number of future jobs, both the Council and the LEP have robust economic ambitions for the area that signal a commitment for a step-change on past employment activity. There is also the need to ensure that existing levels of out-commuting (particularly in the southern parts of the District) do not become exacerbated and that self-containment improves. Taking this all into account the proposed adjustment to 616dpa is justified in ensuring that the OAN positively supports, as a minimum, the EEFM estimated level of job growth.
30. At the time of the SHMA update in 2017 the analysis of the market signals concluded that there was no strong case for a further uplift although it noted an increase in the number of concealed households equating to an increase in the level of housing need of 54dpa across the HMA, of which it is recommended 8dpa would be apportioned to South Kesteven. However, since the SHMA was published in early 2017, it is evident that market signals in South Kesteven in relation to house prices and in turn purchase and rent affordability ratios to incomes have worsened to a point where a modest uplift can be reasonably considered. Consequently, the submitted OAN is no longer sound in only making a very small adjustment for concealed households, this being neither justified, effective nor positively prepared.
31. Establishing future housing need is not an exact science and there is no precise formula or method in the PPG for market signals. I am also mindful that an adjustment has already been made for future jobs, which would simultaneously improve affordability to some degree. Accordingly, some caution is required to avoid multiple adjustments that would bluntly compound

to over-estimate need rather than subtly combine to a point that better reflects actual need. An uplift in the 5-6% bracket (30 to 36dpa) based on similar adjustments made to local plans with comparable market pressures has been considered. Broadly, a mid-point figure in this range, when added to 616dpa, would result in a revised OAN of 650dpa. This would be a positively prepared, justified and effective response to the latest market signals evidence, would realistically improve affordability, and as such I recommend the adjustment. MM1, MM3, MM4, MM10, MM11 and MM15 would all make clear at relevant parts of the plan that the soundly based OAN is 650dpa and I recommend them all accordingly.

32. Other than the adjustments for future jobs and market signals, there are no specific local circumstances that indicate that the OAN for South Kesteven should be adjusted further.

#### *Conclusion on Housing Need*

33. On most aspects of calculating housing need the 2017 SHMA represents a robust evidence base, however, in respect of latest housing market signals, the 625dpa OAN would not be sound. Consequently, the OAN from 2016/17 onwards (to align to the availability of the 2014 based projections) needs to be increased to 650dpa as set out above and reflected in the consequential MMs.

#### *Housing requirement*

34. The housing requirement in the submitted plan was based on a continuous 625dpa over the plan period (2011-2036) equating to 15,625 dwellings. Given the need to modify the OAN this would not be a justified or effective approach and is therefore unsound. The modified OAN of 650 dwellings is a response to the 2014-based household projections and the evidence of worsening market signals since 2016. Consequently, it would not be appropriate to retrospectively apply this adjusted need to the early part of the plan period (2011-16). Accordingly, the housing requirement should be stepped so the trajectory is measured against an annual requirement to deliver 625 homes over the first five years of the plan period and then rising to a continuous annual requirement of 650 dwellings over the remainder of the plan period from 2016/17 onwards. Cumulatively, the housing requirement over the plan period on this basis would increase to 16,125 dwellings. I therefore recommend this higher housing requirement for the plan period as being necessary for effectiveness, positive preparation and consistency with national policy. MM1, MM3, MM5, MM10, MM11 and MM15 would all make clear at relevant parts of the plan that the sound housing requirement to be planned for is 16,125 dwellings and I recommend them all on this basis accordingly.
35. The 2014 SHMA identifies (at Table 51) an annual need for 343 affordable dwellings as part of the overall need to balance the housing market in South Kesteven through a variety of housing products. The latest 2017 SHMA partial update (Figure 4.8) points to a reducing affordable housing need in main part due to rising income levels. Nonetheless, affordable housing demand represents a significant proportion of the 650dpa OAN. The plan's submitted approach of 30% affordable housing provision (including a modified 20% for the Grantham Urban Area) on qualifying sites is not, on its own, going to meet

affordable housing need in its entirety. That is not a unique circumstance to South Kesteven, but I am required to consider whether the housing requirement should be increased to secure further affordable housing delivery.

36. I have been directed to the recent recommendations from the examination of the adjoining South East Lincolnshire Local Plan where a 5% uplift to the housing requirement was required in response to the need for affordable housing. It does not necessarily follow that a policy uplift in one part of the HMA should be applicable in another part depending on the particular circumstances that prevail in each respective authority. In contrast to South East Lincolnshire, it has been necessary to uplift the OAN in South Kesteven by a similar figure (5-6%). This will improve both affordability and meeting the need for affordable housing.
37. The plan would also positively allow for wholly affordable housing developments (Policy SP4) at the edge of settlements. There is also no policy content that would inhibit the principle of such schemes coming forward as appropriate infill development (Policy SP3). Consideration also needs to be given to the practicality and wider sustainability of increasing the housing requirement at this time. Delivery since 2011/12 has generally lagged behind the submitted 625dpa figure, including some years where delivery has been as low as 428dpa. Whilst there are now signs of performance improving, an OAN of 650dpa (with 20% buffer for choice and competition and a degree of shortfall to recover) is in the short term a realistic and positive ambition for boosting sustained housing delivery.
38. In coming to this view, I have also had in mind paragraphs 35 and 36 of the Elm Park High Court decision [EX/SKDC/33] which state that very often attempting to meet the affordable housing need will result in a figure which the planning authority will have little or no prospect of delivering in practice due to the reliance on the delivery mechanism being a proportion of open market schemes. Affordability, through market signals, is addressed in the full OAN to establish the need for both market and affordable housing. It is a consideration, not an obligation, as to whether the housing requirement should be increased to deliver affordable homes.
39. In the case of South Kesteven, I am not persuaded that increasing the housing requirement further to yield additional affordable housing would be either deliverable or sustainable in the short term. It may well dilute the required focus on a number of long-standing urban extension sites that form part of the most appropriate strategy to secure a sustainable pattern of growth. Once early key infrastructure is in place, the plan makes provision for an appreciable over-supply of housing land in the medium to long term which will include an element of affordable housing delivery, as well as providing a greater degree of resilience in the event that one or more sites might not come forward at the rate anticipated.
40. There are no other local circumstances that indicate that the housing requirement should be other than the OAN. As submitted Policy SP1 introduces some ambiguity around planning for a housing growth that would be approximately 13% above the minimum OAN. For the plan to be effective, it needs to be made clear that this is not a policy adjustment to the plan's housing requirement but a reflection of the degree of over-provision in land

supply. As a consequence of recommended MMs elsewhere, the 13% land supply over-provision figure would change to 18% when taking account of the higher OAN. MM10 and MM11 would clarify SP1 and text elsewhere in the plan to address this soundness matters and make the plan effective and so I recommend them accordingly.

*Conclusion on Housing Requirement*

41. In summary, subject to the above-mentioned modifications, the plan's housing requirement would be soundly based.

*Employment needs*

42. As set out above the principal econometric forecasting is the EEFM output of 6,400 net jobs (2015-2036). In light of the evidence contained in the Council's Economic Development Strategy 2016-21 and the Greater Lincolnshire LEPs Strategic Economic Plan 2014-30, there are credible signals that this should be regarded as a prudent outlook on the economic potential of South Kesteven. The evidence includes, amongst other things, the establishment of InvestSK as a wholly-owned company of the Council to lead on an ambitious economic growth agenda, recognising the need to intervene and take a positive grip on promoting the district and enticing investment.
43. The 2015 Employment Land Study (ELS) recommends de-allocating and retaining a number of employment sites across the District and identifying a need for additional employment land within a range of 47 to 79 hectares. The submitted plan effectively doubles this to circa 155 hectares. I deal with employment land in more detail under issue 6 below but at a strategic level, however, I do not find the proposed scale of over-provision to be in-principle unsound. There are 3 compelling reasons which lead me to this view.
44. Firstly, the ELS is of some vintage, drawing on data from 2005-2012. It pre-dates more up-to-date evidence including, amongst other documents, the refreshed LEP Strategic Economic Plan to 2030 and future growth potential identified in the Council's Managed Workspace Assessment report (2016). Whilst the ELS at Section 6.7 looks to various factors that may instigate a step-change in land requirements I find the ELS relatively cautious, especially given the shifts to larger logistic and warehouse operations which South Kesteven is well-positioned to accommodate. To pause the examination to produce an update of the ELS would take a considerable amount of time. The judicious way forward would be to acknowledge that the proposed early plan review, already recommended in respect of housing need, also needs to be informed by and respond to updated evidence on employment land demand. What is clear in the short term is that this plan will not constrain jobs growth. I return to a recommendation on plan review in Issue 8 below.
45. Secondly, there is cogent evidence of market demand in the District, including the realistic prospect for sizeable premises for the logistics sector. Past take-up rates of employment land are not to be treated as a reliable barometer for future land requirements. South Kesteven, and Grantham in particular, is well-placed on the A1 and East Coast Main Line (ECML) corridors to accommodate demand, including that potentially displaced from proximate locations where land supply is becoming saturated. The principle of the Grantham Southern Gateway as a sub-regionally significant employment area

at the nexus of the A1 and GSRR represents a significant and soundly-based strategic employment land opportunity. It is also important to take into account the evidence published alongside the ELS of the potential to relocate existing businesses within predominantly residential areas of Grantham (for example Alma Park). New high-profile sites better related to the A1 are likely to enable this. As such, it would seem prudent to err on the side of flexibility to support latest strategies and ambitions for economic growth rather than cut the cloth of employment land supply too tightly.

46. The submission that such an over-provision of employment land would harmfully dilute focus and delivery ignores the fact that the spatial strategy at Policy SP1 squarely focuses the over-provision at Grantham for the reasons set out above. The same does not apply elsewhere, including the 3 market towns, where the spatial strategy, settlement hierarchy and employment site policies soundly align to identify more modest scales of employment land better related to the need to sustain balanced communities.
47. Thirdly, the ELS summarises at pages 52-53 a number of factors that could create a step-change in demand compared to historical rates. These include the LEPs ambition to deliver 140ha of employment land in the District, increased demand for logistics uses and implementation of the GSRR. All of these factors are now coming to fruition, pointing to the need to avoid potentially constraining economic potential through appreciable de-allocations of proposed employment land. As such the spatial strategy as it relates to employment is sound.

#### *Conclusion on employment requirements*

48. Overall, the plan's spatial strategy to focus a significant scale of employment land provision at Grantham and to maintain a healthy employment land supply at other locations within the settlement hierarchy strikes the required balance between aspiration and realism. The plan will not inhibit economic growth in the short term. The degree of over-provision of employment land above the forecasts in the dated ELS is best revisited through updated strategic evidence on employment land that reflects: (1) ongoing monitoring of the plan; and (2) the latest strategies and programmes of the LEP, InvestSK and others. This is best done through the proposed MM for an early plan review (see Issue 8).

#### *Spatial Strategy*

##### *Securing sustainable development*

49. The plan has been prepared in the context of the NPPF's presumption in favour of sustainable development and assessed for consistency against the NPPF for soundness including paragraph 14 of the NPPF in respect of plan-making. Accordingly, it would not be necessary or effective to repeat the NPPF's presumption as proposed at Policy SD1 of the plan. I therefore recommend MM8 which would remove the policy.
50. Policy SD2 is an overarching policy that seeks to ensure the principles of sustainable development are addressed when development proposals are drawn-up. It is consistent with the fundamental purpose of the planning system as set out at paragraphs 6-10 of the NPPF. It is also a critical policy in ensuring the plan accords with the legal requirements under the Climate

Change Act 2008 to reduce carbon dioxide emissions. The Council has signalled its commitment to preparing a Design Supplementary Planning Document (SPD) which would present an opportunity to clarify how to make successful applications in accordance with Policy SD2 as per paragraph 153 of the NPPF. There is also a need to include policy content on the need to avoid pollution as part of securing sustainable development. MM9 would introduce an additional criterion on this specific point and I recommend it for effectiveness and consistency with national policy.

*The broad location of development*

51. The plan's spatial strategy to focus growth to the major town of Grantham and then to the other towns and some larger villages is an entirely appropriate response to deliver a sustainable pattern of development in the context of the need to boost the local economy, deliver homes, support the sustainability of communities, maximise sustainable travel options and to conserve and enhance the natural and historic qualities of what is predominantly a rural district. On submission the plan distributed 50% of the housing growth and 75% of employment land growth to Grantham, 20% of housing growth to Stamford and smaller proportions to the other towns and 10% collectively to larger villages. In broad terms this is a reasonable distribution, justified by the evidence including capacity studies for Grantham and Stamford, the Settlement Hierarchy Report and SA.
52. As a consequence of MMs recommended elsewhere, Grantham's proportion would increase to 53% with the share of housing growth to Stamford and smaller villages falling only very marginally. For smaller villages the proportion is 4% which is appropriate for this tier of the settlement hierarchy and would comprise completions to date, existing planning permissions and a windfall allowance. The windfall allowance is an estimate and any schemes would still need to conform with the policies of the plan. It would not be appropriate to specify that the 4% should be met evenly across all 60 smaller villages identified given the variance in character and conditions in each settlement to sustainably accommodate additional small-scale infill development. MM15 would reflect the amended and up-to-date breakdown of how the housing need would be delivered by spatial strategy settlement tier and I recommend it so that the plan would be justified and effective.
53. To deliver the homes and jobs needed the plan is justified in pursuing a strategy to allocate greenfield sites at the edge of existing towns and larger villages and supporting the effective use of previously-developed land where this becomes demonstrably deliverable. As submitted, however, Policy SP1 does require two further important qualifications in order to be justified, effective and consistent with national policy and therefore sound. Firstly, to make clear that some previously-developed sites may not be appropriate for development. Secondly, to reflect the NPPF at paragraph 112 that account should be taken of best and most versatile agricultural land and the preference to direct development to areas of poorer quality land. This is pertinent in South Kesteven where there are pockets of Grade 1 land as well as appreciable areas of Grade 2 and 3a land. MM11 would appropriately address both soundness issues within an amended Policy SP1 and I recommend it accordingly.

54. Through a combination of sustainability appraisal, infrastructure planning and the detailed Grantham Capacity and Limits to Growth Study, it is justified and effective that the plan strengthens Grantham as a sub-regional centre in this part of Lincolnshire, capitalising on its location on the ECML railway and A1 road corridor. Committed investment in the Grantham Southern Relief Road (GSRR) further supports the spatial strategy's identification of Grantham as a focal point for growth. The requirement in Policy SP2 (Settlement Hierarchy) that the majority of housing and employment development will be focused in Grantham, including through large scale urban extensions, would be justified and effective in securing delivery. It would also be consistent with NPPF paragraph 52 which states that large scale urban extensions can often represent the best way of achieving the supply of new homes.
55. Elsewhere, it is reasonable that the 3 towns of Stamford, Bourne and The Deepings have a positive and significant role in delivering homes and jobs over the plan period, capitalising on their greater potential to sustain themselves as balanced communities as well as serving a wider rural hinterland. In terms of distribution it is justified that Stamford as the largest of these 3 towns with railway and A1 connectivity and relatively modest rates of growth in recent years takes a more positive role and greater share of growth through new allocations over this plan period. The Stamford Capacity and Limits to Growth Study 2015 and more recent infrastructure planning clearly identifies sustainable options for growth, including through a new urban extension.
56. In the case of Bourne, a significant amount of housing has been delivered since the start of the plan period, with the 1,339 completions being on par with the 1,379 homes delivered at Grantham in the same period. Further substantial volumes of housing remain to be completed at Elsea Park in Bourne (approximately 600 dwellings). The plan at Policy BRN.1, proposes a modest amount of additional housing growth for the town (200 dwellings) to be determined through an emerging neighbourhood plan. I deal with the amount of growth to be determined through a neighbourhood plan separately under Issue 2 below. The principle, however, of assigning a growth level to a neighbourhood plan is consistent with national policy and would be a justified and effective response to the evidence that the neighbourhood plan area for Bourne is already established. There is a reasonable prospect that within the next couple of years a locally endorsed neighbourhood plan will be part of the adopted development plan. However, should this prove not to be the case, I am satisfied that development in Bourne in the short term will not, in any event, come to a halt due to Elsea Park and other sites.
57. Across the district there are a number of larger villages with a reasonable level of services and accessibility. These have been systematically assessed against recognised criteria, principally through the 2017 Settlement Hierarchy Report. As a result, Policy SP2 appropriately identifies 15 larger villages where it would be reasonable to allocate a moderate level of development to provide further housing choices at locations where there are existing levels of day-to-day services. Notwithstanding the proximity of some villages to neighbouring towns in other districts I am satisfied that no obvious candidate settlements have been omitted from the larger villages tier. Collectively, the scale of housing allocation at the larger villages tier is just over 1,000 dwellings. As submitted Policy SP1 on spatial strategy is silent on the considerable role larger villages would play in meeting development needs. This is neither

justified or effective and therefore unsound. MM11 would address this by underlining the significance of larger villages in the overall spatial strategy and I recommend it accordingly.

58. The inclusion of Barrowby as a larger village for growth is disputed but I find the assessment in the Settlement Hierarchy Report to be robust. The proximity of shops and facilities on the western side of Grantham within reasonable walking and cycling of Barrowby offsets any concerns regarding the scale of the post office /shop in the village. Primary School capacity in the village is limited but additional school provision in adjacent Grantham (already coming on stream at Poplar Farm) may reasonably provide part of a pupil planning strategy. Whilst parts of Barrowby retain a village character, other parts are only segregated from Grantham by the A1 and the adjoining corridor for the national grid pylons. This situation is now being consolidated by recently approved housing developments in Barrowby parish east of the A1. There is not a reasonable basis on character grounds to preclude Barrowby from the larger villages tier.
59. The settlement hierarchy at Policy SP2 supports proportional additional development at the larger villages tier in addition to the plan's proposed allocations. In contrast to the approach for Grantham and the market towns there is no qualification that any such additional development should not compromise the nature and character of these villages. This is not justified, effective or consistent with national policy and therefore would not be sound. MM12 would introduce necessary consistency within Policy SP2 in accordance with the core planning principle of taking account of the different roles and characters of different areas.
60. Elsewhere the spatial vision appropriately identifies smaller villages as locations to meet local needs and support local services and employment. In a predominantly rural district, the various smaller villages could cumulatively contribute in a modest way to meeting the District's needs through further infill development (Policy SP3) and at the edge of settlements (Policy SP4) including rural exceptions sites for affordable housing. The absence of any reference to smaller villages in the settlement hierarchy would result in an ineffectiveness when implementing the plan.
61. To resolve this soundness matter, the Council has produced a comprehensive addendum to the Settlement Hierarchy Report which applies a cogent process to identify 60 logical settlements within this tier. The criteria and thresholds applied are reflective of local circumstances in South Kesteven and do not need to be drawn more loosely to include very small hamlet scale settlements. The policies of the plan would facilitate only very limited development at these smaller villages and subject to precise criteria. Whilst a broad range of settlements are included in this tier that is not a justification to lower the threshold for the 'larger villages' tier to include better performing smaller settlements that nonetheless do not have all the necessary sustainability credentials to support planned growth. Consequently, MM12 would introduce the smaller villages tier into the settlement hierarchy at Policy SP2 and I recommend it so that the plan is justified and effective.
62. As submitted the plan does not articulate the spatial strategy in accordance with paragraph 157 of the NPPF by way of a key diagram that shows the broad

locations for strategic development. MM7 would introduce a key diagram and I recommend it for effectiveness and consistency with national policy.

63. In addition to the proposed settlement hierarchy and the positive allocation of land for housing and employment, it is important to note there are no settlement boundaries as a development management tool. Consequently, the plan includes Policies SP3 and SP4 as part of an essentially permissive framework for infill and edge of settlement development respectively. In order to secure a sustainable pattern of development, it is necessary to clarify that Policies SP3 and SP4 apply to those locations identified in the settlement hierarchy in Policy SP2. MM13 and MM14 would do this and I recommend them for effectiveness.
64. Policy SP3 on infill development includes some specific text which is open to interpretation, for example: 'substantially built-up frontage' and 'the main built-up part of the settlement'. Supporting text to the policy provides some guidance on the likely scale of development envisaged through infill development in the small villages (developments of up to 3 dwellings). This is only a steer, is worded so as not to be prescriptive and given the very rural character of these settlements it is a reasonable guide. To assist the submission of successful applications the proposed Design SPD could helpfully clarify the interpretation of Policy SP3. I therefore recommend MM13 in terms of relating Policy SP3 to the forthcoming SPD for effectiveness.
65. Turning more specifically to the mechanics of Policy SP4 (development on the edge of settlements), the policy is to be read as an accommodating attempt to facilitate a modest scale of locally needed development at the edge of existing settlements where circumstances are conducive to do so. These matters can be controversial but contrary to the submissions that the policy is too restrictive, I find it strikes an appropriate balance in a plan-led system where there is a demonstrable supply of deliverable housing and employment land at higher tier settlements. It is also important to bear in mind that that Policy SP4 applies to all proposals (community facilities, employment, infrastructure, homes for local people etc). In my view, there is a misconception that Policy SP4 is about facilitating considerable additional housing proposals. References are made to content of the 2019 NPPF, for example entry-level exception sites, and consistency with Policy SP4. This is a transitional matter and so it is not necessary for soundness against the 2012 NPPF to modify the policy, recognising that the 2019 NPPF will be a significant material consideration when operating the adopted plan.
66. A chief concern is that the policy sets too high a bar in that edge of settlement proposals must demonstrate local community support through public consultation and/or town or parish council feedback. This criterion, however, appropriately reflects the principle of localism now embedded in neighbourhood planning. It is an entirely appropriate provision for locations where, ordinarily, communities may reasonably expect development not to take place. I see nothing inherently unsound in community support being part of the basis for what are exceptional circumstances. I have been referred to a similar policy in the recently adopted Central Lincolnshire Local Plan and whilst the effectiveness of that policy is disputed, Policy SP4 in this plan should be given time to be implemented and its effectiveness monitored. Whilst the principle of the policy is sound there is a need to make Policy SP4 effective in

terms of its implementation. I therefore recommend MM14 which would introduce a clearer definition of what would constitute community support at criterion (a) of the policy and clarification of criterion (c) would include areas adjacent to site allocations in the development plan. Both amendments are necessary for effectiveness.

*Overall Conclusion on Issue 1*

67. In conclusion, and subject to the main modifications set out above, the plan would provide the most appropriate strategy for meeting the District's housing and employment needs in order to sustain balanced communities over the plan period. It would do so through the most appropriate spatial strategy.

Issue 2 – Are the housing allocations including strategic urban extensions at Grantham and Stamford, justified and effective?

*Site Selection Process - General*

68. The plan is underpinned by a comprehensive site selection process, over several years, which includes a Strategic Housing Land Availability Assessment (2015) (the SHLAA), an early call for sites in 2015 to supplement SHLAA data, initial testing through a 'Sites and Settlement' consultation in 2016 and key evidence documents such as the Grantham and Stamford capacity studies. A total of 333 potential sites have been assessed using an approach consistent with paragraph 157 of the NPPF and paragraph 3-006-20140306 of the PPG. A number of the sites that have been appraised have been carried forward from the 2010 Core Strategy and the 2014 Site Allocations Plan.
69. In total there have been five sieves of the prospective sites (neatly summarised in Topic Paper 1 on site selection). These have applied recognised approaches around suitability, availability and achievability as set out in the Site Assessment Methodology Report 2016. The various stages of consultation on the draft plan have informed the sieving process as well as the various updates to the technical evidence as the plan preparation has advanced. The site selection process is also embedded in Sustainability Appraisal, notably in the Technical annex. There are invariably disputes about the scoring and appraisal of individual sites but there is nothing to substantiate that the site selection is fundamentally flawed, or that inherently more sustainable options have been erroneously overlooked or discounted. Overall, I find the site selection to be robust.

*Grantham*

70. Securing just over half of the housing growth over the plan period in Grantham is integrally linked to delivery of the Grantham Southern Relief Road (GSRR) to unlock land to the south and west of the town. The road is also essential to overcome capacity constraints within the existing A52 road network as it passes in and around the town centre (including an air quality management area). Consequently, I deal with the GSRR and the plan's Policy GR2 (Sustainable Transport in Grantham) up front under this issue rather than separately under Issue 8 on infrastructure, as without the GSRR the plan strategy and the proposed housing allocations in Grantham and the strategic Southern Gateway site would not be sustainable and in large part undeliverable as well.

71. Lincolnshire County Council (LCC) are committed to delivering the GSRR and have secured the necessary planning and road order consents for the project to proceed. Phase One involving the roundabout off the B1174 and the link road towards the A1 accessing the King 31 Distribution Park has already been constructed. Work on Phase 2, the new grade separated junction with the A1, started in Autumn 2019. Phase 3 which will link to the A52 Somerby Hill roundabout is due to be completed in 2022/23 with initial preparatory works under way. Construction of the GSRR will be implemented by LCC.
72. Forward funding for the £102million(m) scheme is principally underwritten by LCC at £69m, together with substantial contributions from Highway England's Growth and Housing Fund (£5m), the Local Transport Board (£11.9m) and the Greater Lincolnshire LEP (£16.1m). This will cover the estimated £22.6m for phase 2 and the £75m envisaged for phase 3. The Council is progressing with LCC and Homes England a £71m funding bid to Housing Infrastructure Fund (HIF) to support, amongst other things, the delivery of the GSRR (linked to the delivery of key housing sites). If successful, the HIF bid will clearly support the viability of sustainable urban extensions around the town. Consequently, there is a reasonable anticipation of LCCs funding being recouped either through the £71m HIF bid or through a tariff approach applied to development (as negotiated on the emerging planning consent for 3700 homes at Spitalgate Heath).
73. The strategy through Policy GR2 to secure developer contributions towards the GSRR from developments in and around Grantham reflects the Transport Strategy for Grantham 2007-2021. It has been a longstanding principle that development would contribute towards the GSRR and, given the criticalness of the GSRR to ensuring Grantham can sustainably expand, such contributions are likely to meet the relevant legal tests. This applies not only to those sites that are directly accessed by the road such as Spitalgate Heath and the Southern Gateway but also other sites, most notably the Prince William of Gloucester Barracks site (PWOGB). As submitted Policy GR2 would provide an effective and justified mechanism to support the funding of the GSRR on a proportional site by site basis. There is nothing in the approach sought in Policy GR2 that would render the plan undeliverable. Overall, the GSRR is on track to be delivered not long after plan adoption and there is no evidence that delivery trajectories for sites linked to the GSRR are at significant risk.
74. The submitted strategy for housing delivery in Grantham involves significant urban extensions to the north-west and south-east of the town, in combination with consented supply on smaller and more moderate sites in and around the town. The submitted plan provides for three residential-led urban extensions of some 3700 homes at Spitalgate Heath, circa 1550 homes on phases 2 and 3 of the North West Quadrant (NWQ) and some 500 homes at the PWOGB site. Elsewhere significant housing delivery in the town is planned to occur north of Longcliffe Road, the remaining capacity at phase 1 of the NWQ (Poplar Farm) and on two sites to the west of the town at Dysart Rd and Barrowby Road.
75. There is concern that there is not sufficient diversity of supply in Grantham and that the submitted plan by continuing, and arguably increasing, a strategy reliant on large-scale greenfield urban extensions will fail to significantly boost supply. The origins of the Spitalgate Heath and NWQ extensions were established some time ago; however, various significant factors, are now

coming together to give appropriate confidence that the housing strategy for Grantham is deliverable.

76. These factors include, but are not limited to, the good progress and early strategic infrastructure delivery (such as the Poplar Farm Primary School) occurring at Phase 1 of the NWQ, the resolution to grant planning permission for the Spitalgate Heath Garden Village scheme, the realistic timetable for implementation of the GSRR and the involvement of Homes England at Spitalgate Heath and in unlocking the potential of the PWOGB site.
77. Deliverability is an important strand of an appropriate strategy but there are other factors. These are examined through the Grantham Capacity and Limits to Growth Study 2015 (GCLGS) which tested various options and directions for growth around the town. The identified urban extensions accord with areas that the GCLGS concluded were suitable for growth having regard to standard planning factors such as landscape, heritage, infrastructure, accessibility and regeneration potential. Further work on the Infrastructure Delivery Plan (IDP) and plan-wide viability study have reaffirmed the reasonableness of the urban extension options identified.
78. The continued allocation of the Spitalgate Heath allocation (Southern Quadrant) would be a justified, effective and positively prepared approach. A significant amount of work has been undertaken since the principle of the site was established in the 2010 Core Strategy, including central government funding. This has now manifested itself in the submission of and resolution to grant planning permission for the site including an initial phase of housing. Whilst it has been a lengthy process to this point, critical matters for the successful delivery of the site are coming to fruition, not least the GSRR.
79. Whilst the infrastructure demands are appreciable, the funding arrangements for the GSRR secured from the LEP and LCC cannot be underestimated in their significance to unlocking growth at this strategically significant site which adjoins the major employment land proposals at the Southern Gateway. In terms of its place-shaping qualities, the garden village principles are going to add value, enhancing the market attractiveness of what is an appealing and high-profile greenfield location close to the town and the A1. Accordingly, it is reasonable to plan on the basis that around 1,650 homes will be delivered at Spitalgate Heath during the plan period, including a modest number within the first five years post 2019/20.
80. Notwithstanding progress on a planning application, given the strategic significance of the site, it would be necessary to retain the site-specific policy content for the site to guide subsequent proposals. The policy needs to recognise the proximity of the Woodnook Valley SSSI which is approximately 1 kilometre from the southern-most edge of this site. MM43 would do this and I recommend it for consistency with national policy at NPPF paragraph 117.
81. The principle of additional housing growth at the NWQ through phases 2 and 3 (Rectory Farm) would be a justified and effective strategy providing for a continuation of the progress being made at Phase 1 (Poplar Farm). The policy framework for the NWQ appropriately recognises the need for a comprehensive master-planned approach and to contain the site. Areas of best and most versatile land would be affected but the benefits arising from a

sustainable pattern of development that would be well-connected and integrated to the town, would significantly outweigh the harm.

82. Phases 2 and 3 would integrate with the development and infrastructure underway at Phase 1 to create the critical mass to support an important level of transport, social and green infrastructure as well as a good range of housing to create a genuinely sustainable new community in this part of the town. To secure a successful outcome given the scale of this urban extension (c.1,550 homes in addition to the 1,800 homes on phase 1) it is necessary that detailed development proposals come forward in a comprehensive manner and to reflect the development brief for the site which is coming forward as SPD. MM44 and MM45 would do this for both the Phase 2 and 3 allocation policies and I recommend them on this basis for effectiveness.
83. Both Phases 2 and 3 would look to the A52 Barrowby Road as the principal connection into the local road network and this would occur close to the interchange with the A1. Whilst there is no in-principle objection from Highways England this is an area that requires further consideration and detailed transport assessment work may well reveal that mitigation measures may be necessary. Additional policy content for both Phases 2 and 3 would make this clear in MM44 and MM45 and again, on this basis, I recommend them for needed effectiveness.
84. To the north-east of Grantham the submitted plan provided for an allocation of some 400 homes north of Longcliffe Road. A development scheme of up to 480 homes was granted outline planning permission on appeal in January 2018 and a detailed reserved matters proposal was submitted in 2018 and is progressing through a design review process. Given the principle of the site for housing, including its suitability, deliverability and relationship to Belton House and Park, have all been tested and accepted, it would not be justified or effective for the plan to continue to identify it as an allocation and provide retrospective detailed policy content. I therefore recommend MM42 and MM46 so as to delete the allocation policy and some associated text, so that the plan would be justified and effective.
85. The Prince William of Gloucester Barracks (PWOGB) site is situated on the higher plateau land to the east of the town where the GSSR will connect with the A52 at Somerby Hill. It is a large former airfield site, comprising appreciable areas of previously-developed land. The Defence Infrastructure Organisation (DIO) have provided evidence that the site is surplus to military requirements and is being made available under the Ministry of Defence's 'Better Defence Estate Initiative' to contribute 55,000 homes to the Government's housing targets. The PWOGB site is being made available over a phased disposal from 2020-24. A site delivery questionnaire and trajectory have been provided for the site which signal the anticipated rate of new homes. The submitted plan already allocates the wider PWOGB site (184ha) but only envisages the construction of 500 dwellings during the second half of the plan period (2026-2036).
86. Matters have evolved regarding the PWOGB such that there is now greater clarity around total site capacity (c.102ha for housing), likely infrastructure requirements and trigger points and the likely balance of uses, including ancillary employment land (c.8ha), as set out in the SOCG between the

Council and the DIO (April 2019). It is also significant that Homes England have signed a recent MOU with DIO recognising that the PWOGB is a site that will receive additional support to accelerate housing delivery on surplus public sector land. Against this context the plan as submitted is too prudent, and somewhat arbitrarily constrained, about the potential of the PWOGB site and is therefore not justified, effective or positively prepared.

87. In modifying the plan to provide a more positive role for the PWOGB site I am mindful that the Council's own evidence contained within the whole plan viability study and the GCLGS both looked at the potential of in excess of 4,000 units at this location. The site is also appropriately considered through the IDP. I am therefore satisfied the evidence base exists to find that PWOGB could make a greater contribution to meeting development needs sooner rather later. It is also important to recognise that PWOGB is not a new option, given there are competitor sites vying to assist delivery. The full extent of the wider PWOGB site was identified in the submitted plan and supported by sustainability appraisal as being part of the most appropriate strategy.
88. Parts of the site have a heritage significance stemming from the former RAF Spitalgate including the Grade II listed officer's mess and other non-designated heritage assets. There are also archaeological considerations in terms of the potential presence of Roman remains. Part of the evidence to the examination is a Heritage Impact Assessment (HIA) 2019. The evidence demonstrates, at a plan-making level, that allocation of the site would be compatible with national policy (NPPF paragraphs 184 and 185) in terms of conserving the historic environment at this location. However, the requirement for a full HIA as part of the planning application process needs to be made clearer in the policy for the site.
89. There is concern that boosting the role of the PWOGB site during the plan period would be undeliverable due to: (i) constricted highway capacity at A52/B1174 Gainsborough Corner junction in advance of the GSRR being completed; and (ii) the ability of the market to sustain two urban extensions in broadly the same peripheral location of the town. On this first point, the evidence presented in the highways technical note for the site (Appendix 2 of the DIO submissions) indicates an initial modelled capacity of between 200 and 500 homes in advance of the GSRR without a 'severe' impact on the highway network. This high-level modelling has used inputs (including representative trip generation) and scenarios discussed with LCC and Highways England. The range is reflective of: (i) the effectiveness of a proposed mitigation scheme to increase right hand turn capacity at Gainsborough Corner through better lane demarcation; and (ii) the comprehensiveness of any package of travel planning and modal shift.
90. The verbal evidence from the highway authority (LCC) to the examination is of a potential headroom of up to 500 dwellings before the capacity at Gainsborough Corner acts as a constraint. Any such capacity would need to accommodate both the development on PWOGB as well as consented initial supply on the Spitalgate Heath site. The 500 capacity is only critical in advance of the implementation of phase 3 of the GSRR which is on programme to open in 2022/23. On this basis, I am satisfied that highway capacity will not be severely impacted by early delivery on the PWOGB site to the scale of around 175 units. This would dovetail with the anticipated delivery on

Spitalgate Heath within this timeframe, noting the current condition limiting development to 150 dwellings before the GSRR phase 3.

91. The second issue is around market appetite and potential saturation from two proximate urban extensions given the adjoining Spitalgate Heath site will involve initial outlets close to the PWOGB site to the south-west of the town. The two sites are different in character with the Spitalgate Heath site a more conventional agricultural greenfield site where the garden village concept, on a relatively blank canvas, will drive the character and appearance of the development. In contrast the PWOGB site has an existing character, heritage and established and maturing landscaping into which early phases of development will assimilate. The sites are separated by the A52 which would provide a further degree of separation. On this basis I see no reason why both sites could not come forward simultaneously to boost supply given the evidence of clear housing need. Once the GSRR is open, the opportunity to create numerous distinct developments across both sites, over some distance, significantly reduces any risk associated with market concentration.
92. The evidence demonstrates that the PWOGB site can assist in terms of deliverable supply within the first five years post plan adoption and as a developable site during the plan period and beyond it is therefore appropriate that the broad capacity of the site is expressed as at least 3,500-4,000 homes of which 1,775 can reasonably be expected to be delivered in the plan period. Accordingly, the policy content for the PWOGB needs to be significantly revised to reflect the latest evidence in the April 2019 SOCG including expanded content to reflect the following:
- a requirement to come forward within the garden village principles and in accordance with a comprehensive masterplan;
  - the infrastructure requirements associated with the site, including a new primary school, highways contributions and significant green infrastructure;
  - the need to protect heritage assets, including the Grade II listed officer's mess building, and secure a net gain in biodiversity; and
  - provision of an ancillary 8ha of employment land.
93. MM47 would provide this necessary policy content and I recommend it so that the plan is justified, effective and positively prepared. I also recommend that part of MM42 which would clarify in the supporting text the earlier timeframe for delivery at the PWOG site, for plan effectiveness. In recommending the revised site-specific policy content in MM47 I have amended, from that consulted on, proposed criterion (b) to clarify that any improvement to the strategic road network (the A1) will only be sought where it is demonstrably required and if it is, any mitigation will need to be agreed with Highways England. This would make the policy consistent with other urban extension policies in the plan. I also recommend amending criterion (g) to make clear that as much of the recently planted woodland as possible is incorporated into the layout of the development, including as part of any 'community woodland'. I have made this amendment to ensure closer consistency with NPPF paragraph 117. I have also slightly amended criterion (i) to be more positively prepared about encouraging the effective use of SuDS in line with NPPF paragraph 103. Additionally, I have modified criterion (iv) to specify that a HIA would be the evidence to evaluate impact on heritage assets at the site. None of these adjustments I have made to MM47 fundamentally alter the

policy and essentially provide further clarification consistent with the SOCG between the Council and the DIO.

94. Whilst not a housing allocation policy, Policy GR1 seeks to protect and enhance the setting of Belton House and Park, a Grade I listed property and a Grade 1 registered historic park and garden to the north-east of the town, which is a National Trust property. On submission the only land proposed for release in the north-east of the town was north of Longcliffe Road. As set out above, the principle of the site is now established following a planning appeal decision in 2018. There are no other allocations proximate to Belton House and Park but due to the topography of Grantham the extent of the visual setting of these heritage assets is extensive.
95. Going forward Policy GR1 recognises the heritage significance of Belton House and Park, seeks to preserve and enhance their settings and apply the Belton House and Park Setting Study 2010 (BHPSS) in terms of informing assessment through a Heritage Impact Assessment. Whilst a main modification was discussed at the hearings to include a reference to the 2012 SOCG between the Council, National Trust and (then) English Heritage, on further reflection I consider that to be superfluous and not necessary for soundness for three reasons. Firstly, the wording of Policy GR1 is the same as that of Policy SAP11 in the adopted Site Allocations and Policies Plan Document 2014. This plan, including Policy SAP11, was found sound in the context of the same 2012 NPPF against which Policy GSR1 has been submitted. Secondly, Policy GR1 replicates the wording at appendix 1 of the SOCG as agreed. Thirdly, the SOCG is clear that Figure 15 of the BHPSS is not erroneous or needs to be amended but that as a summary plan it is not the defining evidence of the limit of visual sensitivity and recourse is therefore needed to the detailed contents of the BHPSS, particularly Section 3 on the sensitivity of the setting to change. The supporting text to Policy GR1 makes no reference or places any reliance on Figure 15 of the BHPSS. This is in line with the SOCG. Overall, I am satisfied that Policy GR1 and supporting text would provide for the appropriate safeguarding of the setting of Belton House and Park when assessing individual development proposals.
96. The allied issue is whether the GCLGS 2015 has under-estimated the impact of proposed sites in the plan around Grantham on the setting of the house and park. The BHPSS is part of the baseline of evidence to the GCLGS and the consultants who prepared the GCLGS acknowledge they placed a reliance on Figure 15. However, for plan-making purposes I find that a proportionate approach given the SOCG recognises that matters of detail, such as the final height of buildings, will be critical in assessing any wider visual impact.
97. Whether matters of detail in relation to Gonerby Hill point to a more systemic issue with the GCLGS being "flawed evidence", I am not persuaded. The GCLGS assesses the Belton Park direction of growth (Direction B) and this was readily discounted. Other proximate directions of growth (Direction A (North of Manthorpe); Direction C (Alma Park/Londonthorpe) and Direction D (East of Harrowby/towards Cold Harbour)) all recognise that the setting of Belton House and Park is a potential constraint but the potential for mitigation exists. This has been a reasonable and proportionate approach for plan-making.

98. I have considered the potential impact of PWOGB site, on higher land to the south/ south-east and find the assessment in the submitted HIA for this site to have appropriately considered the setting of Belton House and Park (pages 37-38) despite the c.2kilometre intervening distance. The conclusion in the HIA of a negligible impact on the setting of the house, park and gardens due to the location of the PWOGB at the very fringe of the wider rural landscape character around the heritage assets is sound from a plan-making perspective.
99. Elsewhere the BHPSS identifies that parts of the NWQ would be visible from Bellmount Tower and from parts of the roof of Belton House so as to be within Element 1 land. The advice from the BHPSS is that major development will be exceptionally sensitive in Element 1 land and therefore unlikely to be suitable except on flatter ground (within 2km-5km from the House and Park) and no more than 2 storeys tall. An issue for the NWQ is that Phase 1 is already permitted and being constructed within Element 1 land (a point reflected in the GCLGS p.119). The degree to which further development at the Rectory Farm (phase 2 and 3) allocation would be harmful to the setting of Belton House and Park would be less than substantial, due to the appreciable intervening distance and being experienced in the context of, but further away from, adjoining urban expansion. Given the NWQ represents a sustainable location, I find the wider public benefits of providing much needed housing and community infrastructure to significantly outweigh any harm to the setting of the Belton House and Park heritage assets.
100. Overall, Policy GR1 is an appropriate policy approach to Belton House and Park and embeds the 2012 SOCG. The GCLGS has taken a proportionate and reasonable approach to the setting of these heritage assets. The BHPSS remains relevant when determining the detail of individual development proposals and the submitted plan is sufficiently clear on this point.

*Stamford*

101. It is evident from the Stamford Capacity and Limits to Growth Study 2015 (SCLGS) that directions for growth, notwithstanding administrative boundaries, are constrained by the Grade I listed Burghley House and Grade II\* Burghley Park Registered Park and Garden to the south-east, the landscape quality and flood risk of the River Welland to the south and south-west. Accordingly, it has been justified as part of the plan preparation process to look in more detail at a focussed range of options in an arc around the north of the town.
102. The detailed assessment of these areas identifies a smaller residual land area suitable for development of about 100ha and a capacity for 2,500 dwellings, directly to the north and east of the town. The sieving process is robust and transparently presented in the SCLGS through a detailed narrative assessment against recognised planning criteria. As always, there can be differences of opinion about the judgement of the significance of likely effects but on the whole I find the SCLGS outputs to be reasonable, including those areas discounted for landscape impact or remoteness from the town.
103. The logical and most sustainable option for Stamford to make a significant and proportional contribution to meeting the District's housing need would be the proposed urban extension at Stamford North. In combination with proposals

on adjoining land at Quarry Farm in Rutland's administrative area, there would be the capacity to deliver around 2,000 homes. This would create the critical mass and land availability necessary to deliver an east-west access road linking the A6121 Ryhall Road through to the former A1 Old Great North Road as well as other transport infrastructure to provide connectivity into Stamford, a new primary school and expansion at the adjacent secondary school.

104. The suitability of the proposed Stamford North allocation is demonstrated in the assessment of Area 1 in the SCLGS. The site comprises gently rolling farmland with few landscape features. Consequently, there is considerable potential to provide appreciable green infrastructure and net biodiversity gains, including on land east of the former railway line adjacent to the River Gwash. As submitted the plan states that no development will be permitted in this area closest to the River Gwash but there appears to be little justification for a moratorium, provided that the area remains primarily open. MM48 would provide an appropriately balanced approach for this part of the site, which could allow for development that maintains openness, such as surface water drainage solutions, and so I recommend it for effectiveness.
105. Elsewhere, existing housing at the north of Stamford already forms a relatively hard ridgeline urban edge such that the proposed Stamford North allocation would present a significant opportunity through a high-level masterplan and accompanying development brief to secure a sensitively landscaped northern perimeter. The extent of the allocation responds to the landscape evidence and avoids breaking the next ridgeline to the north thus avoiding visual intrusion on the rural setting of Ryhall and the Castertons. It would be a suitably contained extension to Stamford.
106. As predominantly arable farmland the allocation presents good opportunities to secure net gains in biodiversity. The capacity of the site is realistic and takes appropriate account of the Candidate Local Wildlife Site at the Quarry Farm site (which could be potentially reconfigured) and the environmental value of the Gwash valley floor at the eastern end of the site.
107. The proposed east-west road through the site would be necessary to ensure that the residual cumulative impacts from traffic generated by the scheme would not have a severe impact on the existing road network, particularly within the relatively constrained historic core of the town. Whilst initial modelling (LCCs updated transport model for Stamford 2017) shows the implemented east-west road would be effective to serve the wider 2,000 home urban extension, further detailed transport assessment work would be necessary. This would include clarification of the trigger points for any off-site highway works as well as the point at which the complete through route would need to be provided and the sequencing of any housing delivery at Ryhall Road in advance of a completed east-west road before the highway network in Stamford would reach a severe threshold. Given the principle purpose of the road is to provide a town centre avoiding route for the development to access the A1 to the west, it seems logical, as the site promoters submit, that development would principally evolve from west to east such that the complete through route may not be needed for some time. Overall, MM48 would necessarily make clear in policy that a full transport assessment, together with a phasing plan, is required to support the masterplan for the site and I recommend it for effectiveness.

108. The whole plan viability study states (paragraph 12.12) that the proposed extension is marginally viable if it is to support the access road as well as the other policy requirements (including 30% affordable housing). Ongoing work since the Whole Plan Viability Study indicates stronger sales values in Stamford which if replicated on the urban extension site would improve the gross development value. The place-making ambitions for the Stamford North site, to be secured through the plan's requirements and a Development Brief SPD for the site (being prepared jointly with South Kesteven and Rutland) including a site-specific infrastructure delivery plan, point to creating values that feed into a more positive viability picture. The bottom line is that the urban extension is a viable development including the infrastructure requirements that would be necessary to make it a sustainable scheme.
109. Residents of Stamford North would be able to access services and facilities in the town, including employment, by improved connectivity by foot and cycle given the relatively modest distances involved. Recognising a synergy between this part of the District and the economic enticement of nearby Peterborough, residents at Stamford North would have the option to travel to the city by either rail or bus, modal choices that do not exist for many other settlements in the plan area. As such Stamford North offers a location with genuine potential for modal shift from private car use.
110. That does not diminish the fact appreciable volumes of road traffic will disperse from the site including a proportion that will need to connect to the A1 southbound at the A606 junction. In doing so, there is no persuasive evidence that Sidney Farm Lane as the primary route, or alternatively Arran Road or a secondary option, are unsuitable to provide links from the B1081 Casterton Road to the A606 and A1 southbound. The PBA report for Stamford North<sup>2</sup> sets out a number of reasonable options for Sidney Farm Lane, which is already a distributor type road. Signalisation is proposed as the principal mitigation for Sidney Farm Lane junction with the A1 slip roads. There is sufficient technical evidence and acceptance of a "reasonable prospect" for plan-making purposes that this would form the basis of a workable solution<sup>3</sup> such that matters can proceed where details could be developed and agreed at a planning application stage.
111. Whilst there is no objection to the principle of Stamford North in terms of the performance of the strategic road network, the AECOM 2018 technical note for Highways England gives consideration to the mitigation proposed in the PBA report in respect the A606/A1 Empingham Road grade separated junction. The potential mitigation is informed by Mouchel's updated Stamford VISUM transport model work for LCC. It is recognised (as presented in the Council's Examination Topic Paper 3) that improvements are already required to the compact form of the A606/A1 junction such that Stamford North should be seen in this context, including the Midlands Connect Strategy in terms of improvements to the safety and performance of the A1.
112. The PBA report identifies three broad, indicative options to improve the A1/A606 junction. Whilst there is comment about the degree to which growth

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<sup>2</sup> Peter Brett Associates: Land North of Stamford A1 Access Report January 2018

<sup>3</sup> Evidenced in documents EX/SKDC/10c & EX/SKDC/12

in Oakham (west on the A606) has been considered, the peak period considered by Mouchel in the updated modelling, stopping sight distances, lane widths and capacity for signalisation, there is nonetheless a reasonable prospect of achieving suitable mitigation at this junction. AECOM on behalf of Highways England have not dismissed the options in-principle and advise that additional detailed work is required. It would not be appropriate to provide specificity within the policy other than to add a criterion which makes clear that mitigation measures to the strategic road network will need to be agreed with Highways England. MM48 would do this and I recommend it for effectiveness.

113. The proposed smaller housing allocation at Stamford East comprises sustainably located previously developed land within reasonable walking distance of the town centre and close to other services and facilities including employment and a supermarket. Redevelopment of the site would represent an opportunity to create significant improvements to entrance into the town from the east on the A1175 Uffington Road. With this in mind, and noting the site is in various ownerships, the policy requirement for a masterplan would be necessary and proportionate to ensure a satisfactory relationship to remaining employment uses east on Uffington Road and to the employment land immediately to the north of the site.
114. The site is not without issues including contamination and variable land levels, but the plan-wide viability evidence points to a strong market in Stamford as evidenced by recent redevelopments of other former employment sites around the town. Accordingly, any justification for releasing adjoining greenfield land to the east of the River Gwash to necessarily subsidise the redevelopment of the site is unconvincing.
115. As evidenced in the SCLGS and the 2011 Landscape Study land east of the River Gwash at Stamford is a highly sensitive landscape, important to the setting of the town, and consequently has a low capacity to accommodate development. Development east of the river would breach a strong, identifiable limit to the town into an unspoilt area which retains a deep rural character despite the proximity of the urban edge of Stamford. A modest scale of development east of the Gwash may not appear prominent from the Newstead Lane but it would, however, be visible from the rural public footpath to the north which crosses the Gwash valley from behind the Alltech premises up to Newstead Lane.
116. Whilst I acknowledge flood risk from the River Gwash is to some degree moderated by the controlled conditions of the Rutland Water upstream, the principal reason that the eastern boundary of the allocation as submitted is justified is the need to protect the high-quality pastoral landscape character of the Gwash valley to the east. Overall, I find the landscape assessment at pages 84-85 of the SCLGS and the assessment of Site S3a in the 2011 Landscape Study, reinforced by my observations on site, persuasive as to why the submitted allocation is soundly contained on previously-developed land to the west of the river. Extending the allocation east of the Gwash, even only moderately, and bridging the river to do so, would also adversely affect the setting of the Grade II listed Newstead Mill building due to the loss of the openness of the valley floor. The recently installed fish leap does not urbanise or materially alter the rural character of the valley floor at this location.

117. Historical documentation refers to a potential eastern relief road for Stamford including a 'Ryhall Road Link'. There is no evidence that this project remains a transport objective for the town, or that the potential development sites associated with that project (including on land east of the Gwash) provide appropriate justification for an enlarged Stamford East allocation. The allocation is within a minerals safeguarding area and the site policy needs to be modified to make clear that an assessment would inform the planning application(s). MM49 would do this and I recommend it for effectiveness.

#### *The Deepings*

118. The proposed housing allocations at the edge of The Deepings reflect the evidence on site selection<sup>4</sup> and would be sustainable and deliverable or developable options to meet housing need. The proposed allocation on land east of Linchfield Road for 100 dwellings has been granted planning permission and so it would not be justified for the plan to retain the site as an allocation given the principle of the use has now been established. MM52 would make this clear and I recommend it for effectiveness. Elsewhere, the proposed allocation at Linchfield Road, whilst sizeable, would nonetheless infill a logical gap between recent residential development to the south and west and employment and sports facilities to the north. There would be no harmful encroachment into the countryside. The site is a straightforward, deliverable greenfield site likely to be attractive to the market. The indicative capacity of the site at 590 dwellings, on a relatively modest 30 dwellings per hectare, would appear to be unnecessarily restrained. MM53 to boost capacity to a realistic 680 dwellings is therefore recommended so that the plan would be justified and positively prepared.

119. Land at Millfield Road to the west of The Deepings was provisionally allocated for housing in earlier iterations of the plan but was subsequently involved in a Village Green application leading to a justified decision to remove the site prior to submission given the uncertainty on availability/deliverability. The July 2019 decision of the tribunal not to approve the application for Village Green Status was issued after plan submission and after the examination hearings. Nonetheless, it remains that there are sufficient sustainably located sites to meet identified needs in the District both for housing and employment. There is no need as a result of this examination to allocate additional development land in The Deepings as part of this plan. Without prejudice and noting the site has been subject to an extant planning application since November 2018, from a local plan perspective the latest situation at Millfield Road should feed into the usual evaluation of land requirements as part of any plan review process and the submitted plan at paragraph 3.47 is sound in this regard.

#### *Bourne*

120. As set out above the spatial strategy for the town of Bourne reflects the situation that the Elsea Park extension to the south of the town has in recent years delivered some 1,700 new homes with a further 600 homes due to be delivered in the next five years. Accordingly, only a modest additional 200 homes are assigned to the town through the submitted plan. Submitted Policy

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<sup>4</sup> usefully presented in Topic Paper 1 [EX/SKDC/8] & Site Appraisal document [EX/SKDC/8a]

BRN.1 looked to the town's emerging neighbourhood plan to make the site allocations for this growth. During the examination, however, evidence was provided of a proposal for around 100 homes on land allocated for employment at Manning Road. This is a site, surrounded by existing development, including housing to the west. It is within easy walking distance of the town centre, schools and other facilities. It would be a sustainably located site that is characteristically different to other potential peripheral housing options. It is an obvious infill site within the built fabric of Bourne.

121. In light of the development interest, the lack of interest in the long-standing employment allocation and the general good employment land supply in Bourne, it would not be the most appropriate strategy to retain the employment allocation (see also Issue 6 below). On this basis the submitted plan would neither be effective nor justified and therefore not sound. Rather than simply de-allocate the site and deal with the potential consequences of a very large residential windfall site on 'white land' within the settlement, the effective and positively prepared approach would be to allocate the Manning Road site and set site-specific policy in the plan to manage its development.
122. Consultation on the main modifications and associated policies map change has not identified any insurmountable issues that would inhibit the residential allocation of the site and it is notable that both Bourne Town Council and the Bourne Neighbourhood Plan Steering Group support the identification of the Manning Road site. Detailed work on flood risk (noting the site is predominantly within flood zone 1), drainage solutions (in accordance with modified Policy EN5) and accessibility may well inform the final capacity of the site, which is expressed as an indicative capacity in any event based on a modest 30 dwellings per hectare.
123. Accordingly, I recommend MM50 to adjust Policy BRN.1 to specify that the remaining housing balance to be allocated through the Bourne Neighbourhood Plan is moderated from 200 to 100 dwellings. I further recommend MM51 to re-allocate the Manning Road employment site for indicatively 107 dwellings and to provide necessary site-specific policy content. With these modifications the approach to housing supply in Bourne would be effective, justified and positively-prepared. I am mindful of the representations seeking additional land releases in Bourne, including specifically for care home provision. The neighbourhood plan process will provide a framework for additional provision in the short term in order to conform to this plan, including Policy BRN.1.

#### *Larger Villages*

124. A small number of proposed allocations now have the benefit of planning permission at Billingborough (site H5), Swinstead Road, Corby Glen (site H7) and Langtoft (Site H9). Accordingly, it would not be justified or effective for the plan to continue to present these sites as allocations and so MM57, MM58, MM61, MM62 and MM63 are all necessary and I recommend them accordingly.
125. The proposed extent of the allocation at Wilsford Lane North, Ancaster as submitted follows initial pre-application discussions resulting in a particularly complex eastern boundary which could be sensibly re-drawn and squared-off for allocation purposes as shown on the consulted modified policies map

[SKPMC-1]. Whilst an edge of village location, the proposed density of 16 dwellings per hectare would be an inefficient use of land for what is a relatively contained and sustainably located site. A higher density of 30 dwellings per hectare would not be out of kilter with the local context and would remain a suitable density for a village location. It would result in an increase from 35 to 96 dwellings. The site-specific policies for both sites north and south of Wilsford Lane should also be amended to recognise they are within a Limestone Mineral Safeguarding Area. There is no evidence, given the adjacent housing, that this would inhibit the allocations coming forward, but it is a valid matter to be addressed in a mineral assessment with any planning applications being submitted. It is also necessary to specify in policy that access to the north site would be taken from Wilsford Lane. These changes are presented in MM54 and MM55 and I recommend them for effectiveness.

126. The proposed allocation at Low Road, Barrowby would represent a significant increase in the size of the village but given its location on the southern edge and extent of intervening development it would not harm the character of the historic core of the village. The allocation is in three adjoining land parcels. One of the areas now has outline planning permission, the evidence from which indicates that the site, notwithstanding the need to create landscaped edges, could cumulatively come forward at a capacity that could yield more than the 230 dwellings envisaged in the submitted plan. A careful balance needs to be struck between being transparent about the reasonable capacity of the Low Road and ensuring that the final scale of development would not harm the wider village character. A density of 35 dwellings per hectare would be the appropriate response for the local context and would result in an increased capacity of 270 dwellings. That would be a substantial development for the village and as such it would be justified to express the 35 dwellings per hectare as a maximum density to protect the edge of village character.
127. In order to ensure the scale of development is assimilated into its edge of village context, and notwithstanding part of the site has planning permission, it remains justified that a masterplan is prepared to coordinate remaining development, ensure appropriate phasing and secure substantial landscaping at the southern and eastern boundaries. MM56 would adjust the capacity of the site to a realistic figure and introduce necessary policy reinforcement on the importance of a masterplan and substantial landscaping and so I recommend it for effectiveness.
128. In respect of Colsterworth there are some relatively evenly appraised options for additional growth in the village. The proposed site for 70 dwellings on Bourne Road would be a sustainable option that would infill an enclosed parcel of land on the eastern edge of the village adjacent to the A1. There is no compelling evidence that the proximity of the A1 cannot be mitigated or that noise or air quality associated with the A1 would result in an adverse effect on the living conditions of future occupants. The proposed allocation would also provide an alternative site to the market to come forward in tandem with the approved 48 home scheme off Bridge End, thus boosting delivery. There are no over-riding sustainability or housing delivery reasons to release additional sites in Colsterworth through this plan.

129. Turning to Corby Glen, the proposed allocation at Bourne Road would be significant at 250 dwellings. Subject to a comprehensive masterplan, landscaping and open space any perceived harm of an over-development would be allayed. The proposed density of 30 dwellings per hectare would be an appropriately efficient use of land at this edge of village location. There is no clear evidence that the safety of the road network would be severely comprised including the B1176/A151 junction in the centre of the village. The policy requires pedestrian and cycle connectivity from the site to nearby village facilities thus reducing reliance on car journeys. Overall, the proposed allocation is soundly based.
130. The proposed allocation at Thistleton Lane/Mill Lane in South Witham is proximate to a regionally important and locally significant geodiversity site at South Witham Quarry and it is important, consistent with NPPF paragraph 117 that any impacts on geodiversity are minimised and harm to geological conservation interests prevented. Additional policy content would require consideration of the matter and it would not be burdensome in bringing the site forward. Consistent with other policies in the plan as a greenfield site at an edge of village location it is justified that development seeks to secure improvements to biodiversity. MM64 would introduce necessary additional policy content to reflect the environmental context of the site and I recommend it for effectiveness and consistency with national policy.
131. The proposed allocation at part of Elm Farm Yard in Thurlby would be at the southern edge of the village, adjacent to the busy A15 road. Whilst some key facilities are located within walking distance without need to cross the A15, the church, the pub and the southbound bus stop are located on the other side of the main A15 road. Given the volumes of traffic, road alignment and absence of footways along the A15, it would be an unattractive and difficult task for future occupants of the proposed housing to cross the road to access these services. Accordingly, it would be justified to require the development of the site to include for safe pedestrian connection to facilities east of the A15. It would not be reasonable, however, to introduce specificity on what form this should comprise, which is best left to negotiation with the local highway authority as part of securing safe and suitable access for all people. I therefore recommend MM66 for effectiveness.
132. A number of the proposed allocations in the larger villages are within mineral safeguarding areas and/or specific limestone minerals safeguarding areas. Accordingly, where sites are affected the plan needs to reflect this and be clear that a minerals assessment will be required when proceeding with the submission of a planning application. Accordingly, I recommend MM59, MM60, MM64 and MM65 so that the plan would be effective in relation to the significance of ensuring workable mineral resources are not profligately impeded.

*Summary and conclusion on Issue 2*

133. Policy H1 of the plan sets out the housing allocations over the plan period. It requires a number of updates and clarifications to reflect the changes to the capacity of sites discussed above and to remove those allocations that have planning permission as of 1 April 2019. MM16 would update Policy H1 so that

it is justified, effective and positively prepared and I recommend it accordingly.

134. In conclusion, subject to the above-mentioned modifications, the plan's housing allocations, including strategic urban extensions at Grantham and Stamford, would be justified and effective.

Issue 3 – Does the Plan provide for an adequate supply of developable and deliverable housing land including a positively prepared policy framework to meet all housing needs?

135. The housing requirement over the plan period (2011-2036) needs to be increased from 15,625 to 16,125. In profiling the annual requirement this would need to reflect a step-change from 625dpa to 650dpa from 2016/17 onwards. The submitted plan asserted that the identified supply of 8,726 dwellings factored in a 13% "over allocation" to offer choice and contingency to the market, recognising the plan's reliance on strategic greenfield sites, particularly at Grantham and Stamford. Given the updated housing requirement this needs to be revisited as the figure is very likely to have changed as a consequence of updated monitoring in 2018/9 and various modifications recommended to the housing allocations.
136. The submitted plan was informed by 2017/18 data on housing land availability, including the short section on monitoring and implementation which presents at Figure 41 the housing trajectory and at Figure 42 completions since 2010/11. Again, the trajectory needs to be revisited in light of the updated housing requirement. During the examination, and prior to the relevant hearing sessions, the Council was able to produce the latest 2018/19 data which would helpfully enable the housing land supply baseline to be updated to 1 April 2019. Bringing this all together, the submitted plan would not be effective, justified, positively prepared or consistent with national policy with regards to housing land supply.
137. Since the start of the plan period 4,506 dwellings have been completed in the District by 31 March 2019. I note that it includes efforts by the Council to appropriately rectify past under-recording of completions on smaller and individual sites (some 270 dwellings).
138. In terms of the general profile of supply there are three large urban extension sites currently under construction that will deliver just over 1,000 dwellings in the next five years. There is then a good spread of over larger sites with planning permission either under construction or where preparatory work is underway that again would reasonably yield over 1,000 dwellings in the next five years. The Council has a good database of smaller sites under construction or with planning permission likely to deliver 500 homes in the next five years. Added to this the Council has a capital programme to utilise some of its own land assets and this is committed to deliver 140 homes in the next five years. An appropriate allowance has also been made for windfalls at a modest 30 dwellings per annum starting from 2021/22 to avoid double counting. Plan allocations are envisaged to start delivering from 2020/21 onwards and for some of the smaller, straightforward rural allocations that would be reasonable. As identified under Issue 2 above, a notable number of

proposed allocations have either recently been granted planning permission or are in the process of obtaining it.

139. Against the up-to-date housing requirement in this plan there is currently a realistic prospect, subject to the recommended modifications, that the plan will facilitate development in excess of the 11,619 dwellings required over the remainder of the plan period. Accordingly, beyond the more positive re-profiling of delivery at the PWOGB site in Grantham and the re-allocation of employment land at Manning Road, Bourne, there is no need to allocate additional housing sites.
140. In terms of the supply of deliverable housing land for the next five years, the Council's latest April 2019 assessment confirms that delivery since 2011/12 has been variable but predominantly below the requirement so as to amount to persistent under delivery. Latest outputs for the Housing Delivery Test confirm a 20% buffer remains necessary. Consequently, and in accordance with paragraph 47 of the NPPF a 20% buffer needs to be applied to the five-year housing requirement figure. In applying the buffer, there is the allied matter of any shortfall that has arisen since the start of the plan period. Since 2011/12, the shortfall has been 569 dwellings.
141. The evidence is that with a 20% buffer, recovering the shortfall in the next five years (Sedgefield method) would result in a 5.32 year supply whereas spreading the shortfall over the plan period (Liverpool method) would provide for a 5.95 year supply. The latest supply analysis shows a deliverable supply of 4,878 dwellings in the next five years. The Council's profiling of delivery is supported by developers on a number of key sites, particularly the urban extensions at Grantham (Poplar Farm), the completion of Empingham Road/Tinwell Road developments in Stamford and the continuation of significant delivery at Elsea Park, Bourne. The Council has recognised that delivery needs to be diversified and has allocated a raft of small-medium housing allocations at the larger village tier of the strategy. A number of these now have permission and it is reasonable to assume, given their attractiveness to the market, that these village sites would make an appreciable contribution to delivery in the next five years.
142. I have dealt with the realism of assumptions around delivery, with reference to infrastructure capacity and market absorption rates, to the key strategic sites proposed in the plan in Issue 2. The principal comment is directed to the ability of the PWOGB site in Grantham to yield a supply of 175 homes in the next 5 years. I accept that the timeframes involved (masterplan, consent, discharge of conditions and first completions) are bold but the plan needs to reflect the clear ambitions and objectives, including critical Homes England involvement, to accelerated delivery at this surplus public sector site.
143. The revised trajectory shows delivery peaking in 2022/23 at close to 1,200 units. This is a significant step-change compared to recent delivery but would be the culmination of a number of large-scale sites that are currently delivering, with other sites that now have planning permission together with reasonable assumptions about a number of plan allocations starting to meaningfully deliver from 2021 onwards. The trajectory realistically reflects the position at Spitalgate Heath which is now coming to fruition and prudently does not make an allowance for Stamford North within the five-year

deliverable supply. Monitoring for 2018/19 shows a modest exceedance of the higher annual housing requirement which points to an encouraging outlook on delivery.

144. I therefore conclude that the Council's estimates and profiling of deliverable supply are realistic. Whilst it would allow for recovery of the shortfall over the next five years, and this is to be preferred, it nonetheless results in only a small margin over the required five-year supply at 5.32 years. I am concerned that this would be a potentially fragile situation which would not provide the necessary plan-led assurance, particularly given the appropriate degree of reliance placed on a number of strategic urban extensions necessary to secure a sustainable pattern of development. It is therefore effective and justified for the shortfall to be spread over the remainder of the plan period to provide a more robust land supply, to a more prudent figure just shy of 6 years supply.

145. Looking over the entirety of the plan period and total deliverable and developable supply, the latest evidence in the revised trajectory indicates a supply buffer of 18%. This would amply provide for an ongoing supply of housing land.

146. Taking all of this into account, the plan needs to contain an up-to-date trajectory and explanatory text that reflects the following:

- The adjusted higher housing requirement from 2016/17 onwards;
- Updated completions 2011/12-2018/19 and the shortfall since 2011
- The application of a 20% buffer, brought forward from later in the plan period to provide a realistic prospect of achieving the planned supply;
- The shortfall to be dealt with over the plan period (Liverpool method); and
- A positive windfall allowance (2021-2036)

147. This would be achieved by the revised contextual text (paragraph 1.11) in MM3 on the growth agenda in the District, MM70 in terms of a number of revised monitoring indicators, MM71 which sets out revised text in the monitoring and implementation section on how housing delivery will be assessed and monitored and MM73 which would replace existing Figure 41 with a revised housing trajectory within the plan's monitoring framework. These modifications are necessary to ensure the plan would be effective, justified, positively prepared and consistent with national policy.

148. In conclusion, and subject to the above-mentioned modifications, the plan would provide for an adequate supply of developable and deliverable housing land including a positively prepared policy framework to meet housing needs over the plan period.

Issue 4 – Would the accommodation needs of gypsies and travellers be met in a way which is positively prepared, effective, justified and consistent with national policy?

149. The Gypsy and Traveller Accommodation Assessment 2016 (GTAA), which applies the latest planning definitions in the Government's Planning Policy for Traveller Sites (PPTS), identifies a need in the District for 32 permanent pitches for gypsy and traveller households and 9 additional plots for travelling showpersons over the period 2016-2036. The methodology and rigour of the GTAA accords with the PPTS requirements on assembling an evidence base.

Since plan submission, clear evidence has been provided that the identified need for travelling showpersons arising from a recognised family group has now been met through the grant of planning permission.

150. As required by the PPTS the Plan sets out the identified need for 32 permanent residential gypsy and traveller pitches and breaks down the need into five-year periods. Half of the need (16 pitches) is required to be delivered within the first five years (2016-2021). This reflects the credible degree of in-depth engagement with travelling communities in South Kesteven to establish an empirical picture of need, which largely reflects newly forming households seeking separate accommodation. The consultants who did this research have a particularly embedded relationship with the travelling communities that goes beyond researching the GTAA and now involves implementation in terms of assisting in the process of finding suitable sites to progress through the planning system.
151. Whilst the PPTS (paragraph 11) refers to land supply allocations where there is an identified need, I place significant credence on the submission that there is an alternative fair and effective strategy to meeting need in South Kesteven, through ongoing engagement and dialogue with gypsies and travellers who have identified a preference to owning family land and obtaining permission. To this end the Council submitted a delivery plan which identifies through a blend of new permissions and additional provision on existing sites an additional 8 permanent pitches which have already been provided since 2016 and reasonable options to deliver the remaining short term need of 8 permanent pitches by 2021.
152. However, before the close of the hearings, a proposal for a site at Cold Harbour, Grantham which would have contributed to supply in the first 5 years was refused planning permission and this has affected the ability of the Council to demonstrate an up-to-date 5-year supply. Consequently, there would be no plan-led certainty to both travelling and settled communities on where and how the identified need would be met. The plan on this basis is unsound, being neither positively prepared, effective or consistent with national policy.
153. Remedial soundness options would include allocating land as part of this plan or to produce a separate development plan document to specifically allocate gypsy and traveller sites. Both approaches would take time, measured in many months and possibly stretching into years, particularly given the absence to date of any proposed land through the call for sites. There are circumstances, however, which justify an alternative interim approach in South Kesteven. This context includes the positive and established involvement of the Council's gypsy and traveller consultants, who are working with the communities to identify and bring forward additional supply. Ongoing monitoring of the Plan will further provide an opportunity for the Council to demonstrate that its pro-active approach to finding sites with gypsies and travellers will deliver.
154. The circumstances as to why a delay to allocate land now would not be a reasonable approach in South Kesteven also include the fact that, for a variety of reasons, there needs to be an early review of the plan. Accordingly, I recommend that MM72 includes specific text confirming that the early plan

review is informed by an updated gypsy and traveller accommodation needs<sup>5</sup>, and ongoing monitoring of delivery against Policy H5, in anticipation that the Plan review would allocate gypsy and traveller sites if required.

155. Accordingly, the approach in Policies H5 and H6 to support individual proposals for gypsy and traveller pitches and residential yards or plots for travelling showpeople, whilst providing a reasonable starting point for increasing the number of traveller sites in appropriate locations, can only be found sound, however, as an interim measure. The wording of the policies needs to be clarified to ensure the matters of integration with the settled community principally relate only to scale and layout in accordance with the PPTS. Additionally, whilst sites need to be accessible to local services a degree of practicality is needed in that locational requirements typically for peripheral sites at or just beyond the edge of settlements may not be readily accessible by public transport or on foot / bicycle. Given the current shortfall in provision, a more flexible policy would be justified. MM20 and MM21 would address these points and assist in bringing forward provision. I recommend them both for effectiveness and consistency with national policy so that the policies are fair, realistic and inclusive.

156. In conclusion, subject to the above-mentioned modifications, the plan's policies in respect of meeting the needs of gypsies and travellers are justified, effective and consistent with national policy.

Issue 5 – Are the policies for delivering a range of housing to meet various needs effective, justified and consistent with national policy?

157. The submitted plan at Policy H2 seeks 30% affordable housing on all sites of 11 dwellings (or 1,000sqm gross residential floorspace) and at criterion d. of the policy that all affordable homes should meet "the accessible homes standard applicable in that location". There are two soundness issues that arise, firstly the justification and effectiveness of the 30% requirement across the board and secondly, the clarity and consistency with national policy on criterion d. On both grounds the submitted plan would not be sound on grounds of justification and effectiveness.

158. The viability picture in the District is mixed, reflecting diverse market conditions, with generally stronger sales values in the south and rural pockets in the north. Generally, market conditions in Grantham are weaker. Sensitivity testing for affordable housing (10%-40%) shows that at a 30% threshold, the brownfield and smaller sites one could reasonably expect to come forward in the urban fabric of the town would be at risk. It would be unreasonable for the planning system in South Kesteven to become fettered by numerous individual site viability appraisals for relatively modest developments. To remedy this, a lower threshold of 20% for the Grantham Urban Area would be justified by the viability study evidence (Table 10.19 of the viability study) and provide an effective way forward, consistent with national policy at NPPF paragraph 173.

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<sup>5</sup> Mindful of the requirement for a wider assessment of caravan/houseboat needs under Section 124 of the 2016 Housing and Planning Act.

159. The delineation of the proposed 'Grantham Urban Area', which would need to be defined on the policies map<sup>6</sup> reflects the existing urban fabric of the town which aligns with the viability evidence. It is submitted that proposed allocations and the consented allocation north of Longcliffe Road should also be included in the 20% zone. I am not persuaded by the viability evidence that these urban extensions and larger sites should be included within the urban zone given they are creating new communities on peripheral greenfield sites which will be distinct in their appearance, product and saleability compared to character and values of sites within the town.
160. I do accept however that infrastructure costs associated with these sites are significant and notwithstanding the viability study conclusions that these sites can broadly support 30% affordable housing there needs to be further acknowledgement and flexibility in Policy H2 for these sites in terms of allowing for site specific viability assessments to be considered, including facilitating variable levels of affordable housing over what will be considerable delivery periods (i.e. lower at the start where there are up-front infrastructure costs and recouped in later phases or where improving viability allows for overage).
161. The reference to the accessible homes standard in criterion d. of submitted Policy H2 is unclear as to whether it is optional standards M4(2) or M4(3) or why it is specifically sought for affordable housing and not other forms of housing. The Council intend to clarify matters within Policy DE1 and I address that separately under Issue 7 below. On this basis removing criterion d. from the policy would be necessary.
162. I therefore recommend MM17 to Policy H2 to include, amongst other things, the Grantham Urban Area threshold of 20% affordable housing, flexibility to allow for specific viability assessments for Grantham urban extension allocations as an exception to an otherwise strict approach of avoiding frequent viability appraisals and to remove criterion d. on accessible homes. The MM would be necessary so that the plan is justified, effective and consistent with national policy in this regard. I have amended the modification consulted on slightly to include a reference to land north of Longcliffe Road, which is now consented, but to ensure a consistent approach to allowing for site specific viability assessments for all existing and former GR3 sites at the edge of Grantham.
163. It is reasonable that larger sites provide an opportunity to deliver some of the demand for self and custom build housing. As submitted Policy H3 seeks up to 2% of plots on sites over 400 homes to be allotted for serviced plots. The 400 homes threshold is reasonable such that in reality only a handful of the very largest allocations, most of which require masterplanning, would be expected to make any provision. The policy does not require serviced plots to be held indeterminately such that they can be released back to the market after a sensible period. The phrasing "up to 2%" would technically allow for significantly less and therefore would be ineffective. Accordingly, 2% should

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<sup>6</sup> Consulted on as SKPMC-2 alongside MM16

be set as a floor rather than a ceiling. MM18 would do this and I recommend it accordingly for effectiveness.

164. As evidenced in the SHMA there is a need for a range and mix of residential accommodation including, in particular, housing for the elderly. Policy H4 sets a broadly reasonable approach in looking to major housing schemes to provide for a mix types and sizes of housing. Clarity is needed (through the glossary) as to what constitutes "specialist housing" for older people. It would not be necessary for major housing schemes to provide for retirement accommodation or extra care and residential care housing, but the policy should set a clear signal of policy support where these appropriately come forward. Nor would it be justified to require specialist provision for accommodation for the elderly to meet recognised dementia standards. MM19 would address these matters and make for a clearer policy and so I recommend it for effectiveness.

165. In conclusion, subject to the main modifications identified, the plan's approach for delivering a range housing to meet various needs would be effective, justified and consistent with national policy and therefore soundly based.

Issue 6 – Are the proposed employment allocations and policies positively prepared, justified, effective and consistent with national policy?

#### *Strategic Employment Sites*

166. The principal strategic employment site for the district and for Grantham is the Grantham Southern Gateway allocation (GR.SE1) comprising various parcels of land amounting to 105 hectares around the proposed interchange of the A1 and GSRR. The area already contains a number of commercial premises and a site with planning consent for a design outlet complex. It is well-related to the existing southern fringes of Grantham and the proposed urban extensions at Spitalgate Heath and PWOGB. In terms of the aspiration to accommodate significant employment growth at this location this would be reasonable given Phase 1 of the GSRR has already been implemented and within the next 2 years this will be a high-profile location adjacent a new grade-separated junction on the A1.

167. The scale and extent of employment land at this location could reasonably be enlarged to accommodate demand for various employment uses without significant adverse impacts on the wider landscape or setting of nearby heritage assets. Accordingly, I recommend the inclusion of additional land between the A1 and B1174 to the south of the proposed Southern Gateway site as a logical consolidation of developable land at this strategic location to create a wider allocation of some 119ha. MM22 would do this and I recommend it to make the plan effective in realising the sought step-change in economic growth discussed in Issue 1.

168. Elsewhere at Stamford, the plan allocates just under 10ha of employment land to the west of the town at Exeter Fields. This is an allocation rolled forward from the 2014 Site Allocations & Policies Plan and remains undeveloped. The site benefits from planning permission and has been the subject of ongoing dialogue between the landowners and the Council [EX/SKDC/35]. The site has a reasonable profile to the adjacent A1 and is suitably located on the western side of the town to avoid commercial traffic travelling through the town. The

evidence in the SCLGS is reasonable in that alternative directions of growth to the north and east would be unsuitable for employment development. Having in mind the test at paragraph 22 of the NPPF there remains a sufficiently demonstrable prospect of the site being used for employment use

169. Given the extensive residential development proposed in Stamford over the plan period and the evidence from InvestSK and others that a lack of reasonable alternative sites for expansion/modernisation may have been a contributory factor to the loss of a number of businesses in town it would not make sense to significantly reduce the one high quality greenfield employment site on the right side of town if Stamford is to flourish as a balanced community. As set out above, the district-wide over-allocation of employment land arises because of the potential to establish a sub-regional strategic employment site at Grantham. There is no persuasive evidence that the Grantham Southern Gateway (some 22 miles north of Stamford) dilutes the potential of Exeter Fields which is positioned in a part of the District where the dynamic is more towards Peterborough as a sub-regional economic hub. Overall, the Exeter Fields allocation in the plan is soundly-based.
170. The strategic employment site at Peterborough Road, Market Deeping is only 4.2ha in size. The scale and location of the site is not of the same calibre as the larger Northfields site with a direct profile to the A1175. There is little evidence that it is justified as an employment site of strategic importance under Policy E1 and therefore its identification as such would not be sound. MM23 would remove it as a strategic employment site and MM24 would reallocate it as a general employment site under Policy E2 and I recommend them as a justified and effective approach.
171. Roseland Business Park to the north of the district is an established, significant employment site with good access to the A1. This former airfield site is already occupied by a variety of employment uses including national and local employers. A residual area of 9ha remains to be developed. As submitted the plan identifies Roseland Business Park under Policy E3 as an existing rural site to be protected. Notwithstanding the concern in the made Long Bennington Neighbourhood Plan regarding intensification at Roseland the evidence from the highways authority confirms that the site is a suitable employment location to be accessed from the existing road network. As submitted the plan is not justified in potentially under-playing the significant potential of a site that is well-related to the strategic road network. I therefore recommend MM23 to include Roseland Business Park as a strategic employment site in Policy E1 in order for the plan to be justified.
172. Unlike the proposed housing allocations, there are no site-specific policies for the strategic employment sites other than some general principles in submitted Policy E1. For a number of strategic sites where there are no particular site-specific issues and other policies of the plan can adequately guide development this would be a justified and effective approach. However, in the case of the substantial Grantham Southern Gateway Site matters are not necessarily straightforward, involving multiple land ownership parcels and the need to coordinate sustainable employment development and associated infrastructure. Accordingly, the absence of site-specific policies for this strategic location is unsound, being neither justified, effective or consistent

with national policy where plans need to provide specificity on how, when and where sites should come forward.

173. Consequently, MM22 would introduce a new detailed site-specific policy for the Grantham Southern Gateway site and would be necessary so that the plan would be justified, effective and consistent with national policy. I therefore recommend it on this basis subject to additional clarity to criterion (f) to promote the use of SuDs and a rewording of criterion (h) as advised by Historic England for consistency with national policy.

#### *Other Employment Sites*

174. Notwithstanding the scale of employment land allocation at Grantham the plan on submission allocated land at the PWOGB site primarily for housing. To secure an overall sustainable urban extension and to make best use of this former defence site it would not be justified to allocate the site solely for residential. Therefore, a subservient element of employment use would be justified in securing a sustainable pattern of development as part of this direction of growth. Accordingly, I recommend the relevant part of MM24 as being necessary to make a modest allocation of 8ha at this location.

175. In respect of Bourne the submitted Plan generally adheres to the ELS evidence such that the proposed allocations either logically consolidate established employment areas to the east of the town or provide jobs at the Elsea Park strategic extension. Following submission, the Council has provided updated and compelling evidence that land north of Manning Road (proposed allocation BO.E2) will not come forward for employment and such its continued allocation for employment uses would not be sound. I therefore recommend that part of MM24 which would de-allocate the site for employment. Even with this modification, the remaining proposed scale of allocated employment land would accord with the scale of planned housing development as part of the overall strategy to maintain a balanced community. There is no persuasive evidence of the need to identify further employment land at Bourne as part of this plan.

176. The proposed policy framework for strategic and other employment sites would allow for other employment generating uses outside of B1, B2 and B8 use classes. In the case of the employment allocations, requiring the demonstration that an end-user has been secured would be onerous and generally difficult to achieve in advance of obtaining a planning permission. It is neither effective or justified. I therefore recommend those parts of MM23 and MM24 to require that an end user is positively identified rather than secured to provide an appropriate balance between avoiding the wholly speculative loss of land for B1, B2 and B8 uses and providing some flexibility for genuine proposals where a named end user could only be secured subject to the grant of planning permission.

177. A range of existing employment sites are protected under submitted Policy E3. For effectiveness the policy needs to make clear that these sites, together with a small number of omitted existing sites which need to be included, are identified on the policies map and I recommend this as part of MM25. The only exception is that land at R3 Gonerby Moor that has an established retail use. This land should be removed from the protection of Policy E3 as per that

part of MM25 and I recommend this so that the plan is justified and effective. Policy E3 should also be amended as part of MM25 to allow for alternative employment generating uses and I recommend this so that the plan is justified and consistent with national policy at paragraphs 21 and 22 of the NPPF.

### *Employment Policies*

178. Policy E5 allows for the loss of employment land and buildings to non-employment uses but as submitted the policy lacks clarity and therefore effectiveness. It is necessary that the requirements around marketing are made clearer as well as ensuring the policy is readily understood that redevelopment proposals which would still maintain the scale of employment activity on the site would be supported. To address these points, I therefore recommend MM26 for effectiveness, amending criterion (a) for comprehension by replacing 'and' at the end with 'or'. The wording of Policies E6 and E8 needs to be effective and consistent with national policy on conserving and enhancing the natural environment. MM27 and MM28 would clarify that consideration of the effect on the natural environment is wider than just protected sites when considering proposals for the rural economy and MM29 would ensure that proposals to support the visitor economy maintain the quality of the natural environment and I recommend them both for effectiveness. Policy E7 in supporting other employment proposals requires qualification that any adverse impacts should be significant. MM30 would do this and I recommend it for effectiveness.

### *Conclusion on Issue 6*

179. In conclusion, subject to the above-mentioned modifications, the plan's proposed allocations and policies to support the existing local economy and the strategic objective for a step-change in economic growth, would be soundly based.

Issue 7 – Are the **Plan's** policies for the natural and built environments, including sustainable construction, soundly based?

180. Policies EN1, EN2 and EN3 concern landscape character, biodiversity and geodiversity and green infrastructure and are generally supportive of the NPPF's aims of conserving and enhancing the natural environment. The positive approach of the plan to maintaining and improving green infrastructure would also accord with the NPPF's aim of promoting healthy communities. However, to ensure the plan is effective and otherwise consistent with national policy, MM31, MM32, MM33, MM34, MM35 and MM36 are all needed:

- To provide greater clarity on various attributes (landscape character, land quality, ecological networks, protected sites) that characterise South Kesteven's environment;
- To ensure the structure and wording of Policy EN2 is consistent with the hierarchy of protection for international, national and local sites and provides greater clarity on the stepwise approach of avoidance, mitigation and only compensation as a final resort.

- To provide necessary precision in Policy EN2 on the obligations of the Habitats Regulations and how development proposals that require Appropriate Assessment will be determined.
- To provide context for what constitutes green infrastructure for the purposes of Policy EN3 and to provide clearer policy content and support where proposed green infrastructure would secure biodiversity net gains consistent with national policy.

181. The NPPF at paragraph 110 requires plans to minimise pollution and other adverse effects on the local and natural environment. The plan appropriately contains Policy EN4 on pollution control which amongst other things recognises the existing Air Quality Management Area in Grantham and seeks applicable mitigation in accordance with the 2016 Air Quality Action Plan. Given the significance of needing to improve air quality an additional strategic objective to minimise pollution which affects health and wellbeing needs to be added to the plan. This in turn needs to be reflected in an additional criterion in Policy SD2 to ensure minimising pollution is one of the principles of sustainable development in South Kesteven. MM6 and MM9 would do this respectively and I recommend them for effectiveness and consistency with national policy.

182. The plan needs to better recognise that pollution also applies to land and water. In respect of the latter, given the sensitivity and vulnerability of the water environment in the Borough, including the ecologically valuable but pressurised upper reaches of various watercourses and the importance of underlying aquifers beneath the generally porous limestone geology of the District, there is a particular need to avoid both the deterioration of the water environment and the ability to meet good status standards in accordance with the Water Framework Directive (WFD). MM37 would necessarily expand the policy and so ensure effectiveness and consistency with both national policy and the requirements of the WFD and MM38 would introduce needed supporting text to implement the expanded policy. Accordingly, I recommend both MMs but have amended MM37 to rectify a missing reference to 'pollution' in the first modified sentence for comprehension.

183. Meeting the challenge of flooding is an issue for the District, the significance of which is documented in the submitted Strategic Flood Risk Assessment 2017 [documents ENV5 & 6]. The sequential test has been applied in respect of the plan allocations and for over-arching development management purposes Policy EN5 would seek to appropriately reduce the risk of flooding. MM39 would introduce necessary effectiveness by requiring that on-site attenuation measures must achieve multiple benefits, including biodiversity and I recommend it for effectiveness. I also recommend expanding MM39 to include the text agreed between the LPA, Environment Agency and Anglian Water in a statement of common ground [EX/SOCG/02]. This would introduce necessary clarity on the surface water hierarchy, giving proper priority to the use of Sustainable Drainage Systems (SuDS) and only permitting disposal into public sewage network in exceptional circumstances. The additional text would also helpfully clarify that development proposals should establish that foul water treatment and disposal already exists or can be provided in time to serve the development and that foul and surface water flows should be separated where possible. Given the sensitivity of the water environment in the district and WFD requirements it is necessary to ensure there is not an increased risk of

surface water and sewer flooding. The additional text reflects the well-established prioritisation of the use of SuDS as referenced in the NPPF and I do not consider by including it as part of MM39 any prejudice would arise.

184. As part of the approach to delivering the NPPF's core planning principle of securing high quality design, Policy DE1 of the plan would generally require the key factors necessary to achieve good design as set out at paragraph 58 of the NPPF. The policy would also support local design responses sought by village design statements and neighbourhood plans as well as reinforcing the Council's commitment to supporting high standards of design on large-scale and significant developments through local design review arrangements. The policy as modified is clear that design review will be sought at an early stage including as part of any necessary masterplanning. However, to ensure the plan is effective and otherwise consistent with national policy, MM40 is needed:

- To provide clarity on what is meant by 'major' development and that the threshold for requirements for innovative design for sustainable living and working and independent design review would be developments of 400 dwellings or more.
- Remove compliance with Building for Life 12 and requirement for lifetime homes and clarify that the requirement would be for at least 10% of new dwellings on all schemes of 10 or more dwellings to be accessible and adaptable in accordance with optional technical standard Part M4(2) of the Building Regulations.

185. The clarification on the 10% requirement for M4(2) accessible and adaptable dwellings is a notable modification to Policy DE1 but reflects MM17 recommended above in relation to Policy H2. In terms of its justification, the evidence on the housing need for older people and the housing needs of those people with disabilities presented in Section 5 of the SHMA is consistent with the evidential requirements for the optional technical standard as set out in the Planning Practice Guidance (paragraphs 56-002-20160519, 56-006-20150327 & 56-007-20150327). Viability of the plan is predicated on all dwellings achieving compliance with Building for Life 12 and Lifetime Homes, which has now been removed. The new 10% M4(2) requirement would not be as onerous on construction cost, may well have market attractiveness, and should therefore be considered viable.

186. Policy OS1 sets out the standards to be sought for all types of open space, including informal and natural green space. MM41 would emphasise the opportunity of aligning open space provision with other requirements such as net gains in biodiversity and green infrastructure and I recommend it for consistency with national policy at NPPF paragraphs 109 and 117.

187. In conclusion, subject to the above-mentioned modifications, the plan's policies for the natural and built environments, including sustainable construction, are justified, effective and consistent with national policy.

Issue 8 – **Is the Plan's approach to** implementation, including infrastructure delivery, plan-wide viability and monitoring, justified, effective and consistent with national policy?

*Infrastructure delivery*

188. Policy ID1 sets out the mechanisms by which necessary new infrastructure would be delivered. As the 2018 Infrastructure Delivery Plan (IDP) highlights the identified infrastructure needs to support sustainable growth in the District are significant. Whilst the cost and funding profile of the GSRR has evolved since the IDP there would remain a significant infrastructure funding gap, likely to still be in the region of the £186million presented in the IDP.

189. Whilst there is positive work on the asset management planning of utilities to support growth including committed investment to the Marston Waste Water Treatment Works near Grantham, the involvement of Homes England at Grantham and a collaborative HIF bid to boost delivery at Spitalgate Heath Garden Village at Grantham, this would not close the identified funding gap. It is evident from looking at the IDP that developer contributions will be critical to delivering initial capacity by financing school capacity and highway improvements in order to unlock early sites and sustain increases in housebuilding over the middle plan period. The Council has not enacted a Community Infrastructure Levy but retains the option to do so. Accordingly, reliance, in the first instance, would be on developer contributions.

190. The plan sets out known essential site-specific infrastructure requirements in the relevant site-specific policy, which is a justified and effective approach. Policy ID1 would provide the over-arching approach to securing developer contributions and notwithstanding the plan-wide viability evidence contains a mechanism for viability assessment where there are site-specific circumstances. The evidence in the IDP and how this has been translated into the plan is broadly consistent with the requirements set out at paragraphs 156, 157, 162, 176 and 177 of the NPPF. Further clarity is, however, required that development is only permitted where there is an agreed timeframe to put in place necessary infrastructure capacity. MM67 would do this and I recommend for better consistency with paragraph 177 of the NPPF.

191. Transport infrastructure is key to delivering both the economic and housing growth in this plan period and beyond, particularly in Grantham. It is also critical to improving air quality, enabling less reliance on the car to access work and services and allowing for the safe and efficient movement of people and goods. The plan appropriately reflects the evidence in the IDP, the latest Lincolnshire Local Transport Plan (LTP4) and the Transport Strategy for Grantham. Policy ID2 of the plan also sets out recognised principles when considering the transport dimensions of development proposals. The policy as submitted refers to demonstrating there would be no unacceptable impact on highway safety. I agree this could introduce uncertainty, with some community perceptions of unacceptable impact likely to be relatively low. Accordingly, the bar should be the severity test at paragraph 32 of the NPPF and MM68 would deal with this and I recommend it for effectiveness.

192. The plan recognises that access to, and quality of, broadband is critical to economic productivity and general quality of life, particularly for a

predominantly rural area like South Kesteven. Policy ID3 would require fixed fibre superfast broadband on all schemes of 30 dwellings or more and fixed fibre broadband for all other residential and commercial developments. The specific quality of broadband provision within new builds and conversions (my emphasis) is governed by Part R of the Building Regulations and parts of the policy would add little to these requirements. Accordingly, the specificity within the policy should be removed such that the policy becomes a supportive policy for communications infrastructure and to ensure future-proofing communication technology is put in place to serve new developments. I therefore recommend MM69 for effectiveness.

### *Viability*

193. The plan is supported by a 2017 whole plan viability study which highlights there is some notable variability in sales values. The other various inputs into the study are also reasonable, including benchmark values, sales and construction costs which include policy requirements from the plan. The appraisal is also predicated on a policy compliant affordable housing provision and standard developer contributions at £2,500 per unit.
194. The outcome of the viability study is that previously-developed land is unlikely to bear the full policy requirements. The plan strategy is not predicated on significant brownfield delivery. The principal previously-developed sites are Stamford East and the PWOGB site at Grantham. I have dealt with the deliverability and developability of both sites under Issue 2 above and there is nothing to indicate that either site would be unviable. Modified Policy H2 (MM17) specifically recognises the need for viability appraisal for previously-developed sites.
195. In the southern parts of the District the residual values are strong for greenfield sites. It is suggested that this supports a more nuanced approach for a higher affordable housing requirement in the south. There is, however, some interesting variability in sales values (Figure 4.5 of the viability study) which cautions against setting a blanket higher requirement in this part of the District. Additionally, there are specific significant costs for the Stamford urban extension and as the viability modelling for the associated typology suggests the results are cautiously positive. Therefore, rather than get into multiple affordable housing requirement zones, the straightforward approach of a 30% affordable housing requirement for the vast majority of the District as set out in Policy H2 would be sound and not threaten the viability of most development necessary to deliver the plan's strategy.
196. There are concerns around the cumulative impact of various infrastructure costs and mechanisms such as design reviews. However, plan-wide viability has sensitivity tested a number of affordable housing options between 10% and 40% [Tables 10.18-10.29] to determine a degree of headroom between benchmark values and gross development costs. The appraisal also makes reasonable allowances for contingencies. The submitted policy of 30% affordable housing, together with the modification for 20% in the Grantham Urban Area significantly smooth out the mixed picture on viability even though a significant number of greenfield typologies, critical to delivering the plan, were deemed viable at 35%. For a significant number of sites the viability study is justifying in finding that 30% affordable housing will aid viability.

Overall, this would be sound from a viability perspective and consistent with NPPF paragraph 173.

*Monitoring and Plan Review*

197. The plan on adoption would replace the 2010 Core Strategy and 2014 Site Allocations and Policies development plan documents. For the avoidance of doubt and to meet legal compliance this needs to be made clear within the first section of introductory text and the list of superseded policies presented in an appendix. MM2 and MM78 would do this and I recommend them for effectiveness and consistency with national policy.
198. Whilst the submitted plan contained a section on monitoring it did not contain a framework setting out the indicators against which the performance of the plan's policies and proposals could be measured, and the potential actions and contingencies were monitoring to reveal divergence from the intended strategy and delivery of the Plan. The Council remedied this through a monitoring framework provided prior to the hearings and have subsequently enhanced and refined its contents such that it would provide for a comprehensive and practicable basis for annually monitoring the effectiveness of the Plan. Accordingly, I recommend MM77 which would embed the monitoring framework as an appendix to the Plan and is needed for effectiveness and consistency with national policy.
199. There is a requirement for local planning authorities to consider the need to review their local plans at least every five years. The plan was submitted for examination towards the end of the period of transition at paragraph 214 of the 2018/9 NPPF. As such there is a need to consider, sooner rather than later, the implications of latest national policy for plan-making in the area.
200. As set out elsewhere in this report there are various aspects that indicate an early review of the plan would be necessary. These include the relative age and datedness of the 2015 ELS and the need to update the evidence on gypsy and traveller accommodation given the shortfall in provision through this plan. The review of evidence would also enable a wider assessment of caravan needs as required under S124 of the Housing and Planning Act 2016. An early plan review would also enable the Council to consider whether its local housing need has changed significantly so as to warrant a re-evaluation of the strategic policies for housing.
201. The proposed early review policy (Policy M1) sets out that a review will commence in April 2020 with submission for examination anticipated by the end of 2023. The proposed 3½ year timeframe would be reasonable to allow the necessary evidence to be assembled and consultation undertaken prior to submission. The word 'anticipated' introduces some uncertainty and so I have amended the policy to set an effective and justified timeframe for submission by the end of December 2023. I therefore recommend the early review policy and accompanying text in MM72 so that the plan is positively prepared.
202. Alongside the monitoring framework, a small number of modifications are needed to clarify the plan glossary and introduce new definitions. These changes are set out at MM74, MM75 and MM76 and are all necessary so that the plan can be implemented effectively.

203. In conclusion, subject to the above-mentioned modifications, the plan's approach to implementation, including infrastructure delivery, plan-wide viability and monitoring are justified, effective and consistent with national policy.

## Public Sector Equality Duty

204. The Plan is accompanied by an Equality Impact Analysis 2019 which has considered the impacts of the plan on those with protected characteristics. The analysis identifies generally positive or neutral effects arising from the plan's policies and proposals. Throughout the examination, I have had due regard to the aims expressed in S149(1) of the Equality Act 2010.

205. There are specific policies concerning specialist accommodation for the elderly, gypsies and travellers and accessible environments that should directly benefit those with protected characteristics. In this way the disadvantages that they suffer would be minimised and their needs met in so far as they are different to those without a relevant protected characteristic. However, in respect of the accommodation needs of gypsies and travellers, I find that in the absence of the plan allocating sites to meet the identified need, the positively worded policies for assessing individual proposals may still result in an uncertain outcome. The principal mitigation mechanism is recommended in MM72 which commits the Council to an early review of the Plan informed by, amongst other things, an updated assessment of gypsy and traveller accommodation needs and greater certainty about how that need will be met through a plan-led approach.

## Assessment of Legal Compliance

206. My examination of the legal compliance of the Plan is summarised below.

207. Prior to submission the Local Plan had been prepared in broad accordance with the Council's Local Development Scheme (LDS) adopted in 2017. During the examination the Council revisited its LDS to reflect actual timeframes. Adoption of the Plan would be feasible with the latest LDS milestones published in September 2019.

208. Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement 2014.

209. Sustainability Appraisal has been carried out, including necessary engagement with the statutory SEA bodies and appropriate reviews of the context and baseline data for the identified SA themes against which the proposals and policies have been assessed. The SA is a predominantly narrative and relatively succinct document, but I am satisfied that the SA has focused on those areas where the effects are likely to be significant including principal reasonable alternatives on the scale and distribution of growth. The SA addendum appropriately considers the proposed MMs. Overall, the SA is adequate.

210. The HRA Report April 2019 has updated the screening of the plan's policies and proposals for likely significant effects in light of recent case law. Consequently, appropriate assessment has been undertaken which has concluded that there would be no adverse impact on the integrity of protected

sites arising from the plan. A similar conclusion has been reached in the updated HRA on the proposed MMs recommended in this report.

211. The plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Climate change is one of the key themes in the sustainability appraisal providing an overall conclusion that the spatial strategy and policies of the plan will limit greenhouse gas emissions and enhance the resilience of the District to the effects of climate change. The particular plan policies that would proactively address climate change include: SD2 which seeks to secure the principles of sustainable development with particular reference to aspects of climate change at criterion (a)-(e); SP1 and SP2 which seek to focus growth into Grantham and the other market towns where the need to travel would be reduced and protect best and most versatile land; EN4 and EN5 on pollution control and flooding respectively; SB1 on sustainable building and construction; and RE1 which supports appropriately located renewable energy.
212. The plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

## Overall Conclusion and Recommendation

213. The plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
214. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the South Kesteven Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

*David Spencer*

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

## **Appendix 4 – Exeter Fields Marketing Report**

Employment Land Enquiry Schedule - Exeter Park, Stamford

Date	Name	Use	Requirement	Contact	Comments
24/08/2017	Airtech	B8	0.5-1 acre	Steve Bell	Interested in relocating a car business, the purchase would be subject to a lease surrender on his current premises, initial enquiry received, no further dialogue and feedback suggested the location would not benefit from sufficient passing traffic.
10/06/2017	HDD Developments	B1,B2,B8	Land for Development	Alastair Robertson-Dunn	Speculative enquiry, looking for commercial development opportunities, potentially interested but would require pre-lets in place and occupiers, investigating demand and unsure about quantum of occupier's who would want space in this location.
06/04/2016	Beeson Wright Limited	B1,B2,B8	Plots 8,9,10 & 11 (6 acres)	Andrew Beeson	Commercial developer looking for speculative development opportunities, initial enquiry received, info provided, chased for feedback but no response.
19/03/2016	Simons	B1,B2,B8	Employment Land	Mark Hawthorne	Interested in the employment land on behalf of retained clients, having provided access to the info pack there was a delay before we heard back, feedback was negative, retained clients have reservations about occupier demand and pre-let opportunities.
29/02/2016	Talkspace	B1,B2,B8	Commercial Land	Jonathan Hand	Interested in commercial development land for retained clients, speculative enquiry, no response having chased for feedback.
20/11/2015	NFU Mutual	B1	Office Accommodation (1,000 sq ft)	Ashley Oxer	NFU Mutual looking for a relocation opportunity, only interested in a long lease and would require 1000sqft, they are looking at other space within the area, require a move in the next 2/3 years. They have concerns about the time for delivery.
04/08/2015	Artisan Developments	Employment	Land for Development	Michael Ayres	Looking for development opportunities across the eastern region, interested in the employment land, would only consider a JV structure to minimise risk, this is unlikely to be viable due to the Promotion Agreement.
01/07/2015	South Kesteven District Council	Serviced Office	30,000 sq ft plus 90 Car Parking Spaces		South Kesteven District Council are keen to secure an office which could be used as a serviced offices, ideally would want a long lease and are flexible on timings, we indicated there could be a delay due to the delivery of infrastructure and servicing.
10/06/2015	First Active / Townfast	Leisure Club	2-3 acres	Steve Hawkins Barker Storey Matthews	Would be interested in offering £300,000-£350,000 per acre for a leisure club, this would be subject to planning and a fully serviced site with no adverse ground conditions, the requirement was immediate, due to timescales surrounding infrastructure and delivery of services it was unlikely we could meet their requirement for a serviced plot in the short term.

24/04/2015	Sophie Allport	Local Office Occupier	2,000 sq ft approx	Sophie Allport	Local occupier looking for 2,000sqft, an immediate requirement, we are unable to meet the required timescales.
06/02/2015	Cavendish Gospel Hall Trust / Plymouth Brethren Christian Church	Church Hall (D1)	2-3 acres	Peter Farrington	Very interested in securing 2-3 acres for a new place of worship, the deal would be subject to a serviced site and planning. Immediate requirement and will consider other locations whilst the infrastructure is delivered at Exeter Park.
11/10/2014	Rugby Investments Pensions	B1 / B2 Business Space	Not Specified		Speculative enquiry, looking for commercial development opportunities, potentially interested but would require pre-lets in place and occupiers, investigating demand and unsure about quantum of occupier's who would want space in this location.
06/06/2014	Stamford Property Consultants	B1/B2 Employment	Not Specified	Hugh Caseley (Kimberley Developments plc) Tom Hindmarch (Chairman of Stamford Property Company Ltd)	Interested in purchasing the employment land at a discounted rate, unconditional and without servicing, this is unacceptable to the Trustees who are not interested in disposing of the land below market value.
14/04/2014	The Ark, Stamford	Nursery	5,000 sq ft	Jo O'Bryan-Tear	Interested in acquiring space for a 5,000sqft nursery, only looking for a long lease and would therefore be an occupier, concerned by timescales, this is an immediate requirement.
01/04/2014	Stamford Estates / Grantham Estates	B1/B2 Employment	Not Specified		speculative enquiry, keen on securing development land, information pack provided, various questions answered, chased for feedback without success, assume they are not interested.

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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Mr	
<b>First Name</b>	Dale	
<b>Last Name</b>	Wright	
<b>Organisation</b>		
<b>Address</b>	██████████ ██████████	
<b>Postcode</b>	██████████	
<b>Telephone</b>	██████████	
<b>Email Address</b>	████████████████████	

***Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
DaleWright	23/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	Yes	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	Yes	No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	Yes	No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	Yes	No		Unsure	
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	Yes	No		Unsure	
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If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No		Unsure	
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If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	Unsure
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If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	Unsure
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If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	Yes	No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	Yes	No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	Yes	No		Unsure	
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If not, please provide details and any alternative proposals.

--

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	Unsure
-----	--	----	--	--------	--------

Please provide details

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	No	Unsure	
-----	--	----	----	--------	--

If yes, please provide details.

--

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

If not, please provide details.

--

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	Yrs	No		Unsure	
-----	-----	----	--	--------	--

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

<p>I would like to see greater emphasis on / requirement for major new housing development to have solar panels or other ground source energy as part of the initial agreement to develop</p>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	Yes	No		Unsure	
-----	-----	----	--	--------	--

Please give details.

--

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	Unsure
-----	--	----	--	--------	--------

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	Unsure
-----	--	----	--	--------	--------

Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

1. Given the Covid -19 challenge and experience, I would like to see an emphasis on building local emergency response capacity into the planning process. This would be relevant in any future pandemic, environmental emergency, terrorist or external military threat. There are implications for new house design, and provision of safe local shelter arrangements, as well as flexible spaces for larger scale medical, feeding and other community needs in time of emergency. I am particularly concerned that we retain the integrity of our open leisure spaces and areas for safe outdoor exercise opportunities that have proved so important over the past year in terms of our physical and mental health.
2. Thinking particularly about Grantham, I also feel it is very important to retain the identity of the town in relation to the views of the countryside on the skyline, not allowing housing to develop in a haphazard way that detracts from the special character and geography of the town, set as it is in a valley surrounded by visible countryside from many vantage points. Preserving this feature of Grantham will hopefully be part of its attractiveness from a future economic regrowth point of view
3. As a pedestrian and cyclist (to and from, as well as within, Grantham town centre) I all too often do not feel as safe as I would like to feel - the speed and proximity of motor vehicles does not provide the relaxing setting for walking and cycling. We have to maximise opportunities and encouragement for people of all ages to take this sort of physical and mental exercise - again, Covid-19 has shown that "underlying health conditions" have made us more vulnerable to the worst effects of the virus. We have an opportunity, through the planning process to build in more human sustainability by giving pedestrians and cyclists just as much priority as motor traffic - and thereby also help Grantham regain its attractiveness as a relaxed and pleasant place to spend time and money

#### **Part C: Sustainability Appraisal Scoping Report**

#### **19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0093

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Mr	Mr
<b>First Name</b>	Nick	David
<b>Last Name</b>	Wade	Hutchinson
<b>Organisation</b>	JE Wade and Sons	Boyer
<b>Address</b>	██████████ ██████████ ██████████	██████████████████ ██████████ ██████████ ██████████
<b>Postcode</b>	██████████	██████████
<b>Telephone</b>		
<b>Email Address</b>	██████████	████████████████████████████████████████

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
Please see representation for more details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
Please see representation for more details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details

--

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

--

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
-----	--	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

--

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

--

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

--

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

--

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	<input checked="" type="checkbox"/>	Unsure	
-----	--	----	-------------------------------------	--------	--

If not, please provide details and any alternative proposals.

Please see representation for more details.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

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Yes		No		Unsure	
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If yes, please provide details.

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If not, please provide details.

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Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

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Please give details.

--

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Please give details

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Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

--

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

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**18. Any other Comments**

**Q14 – Any other Comments**

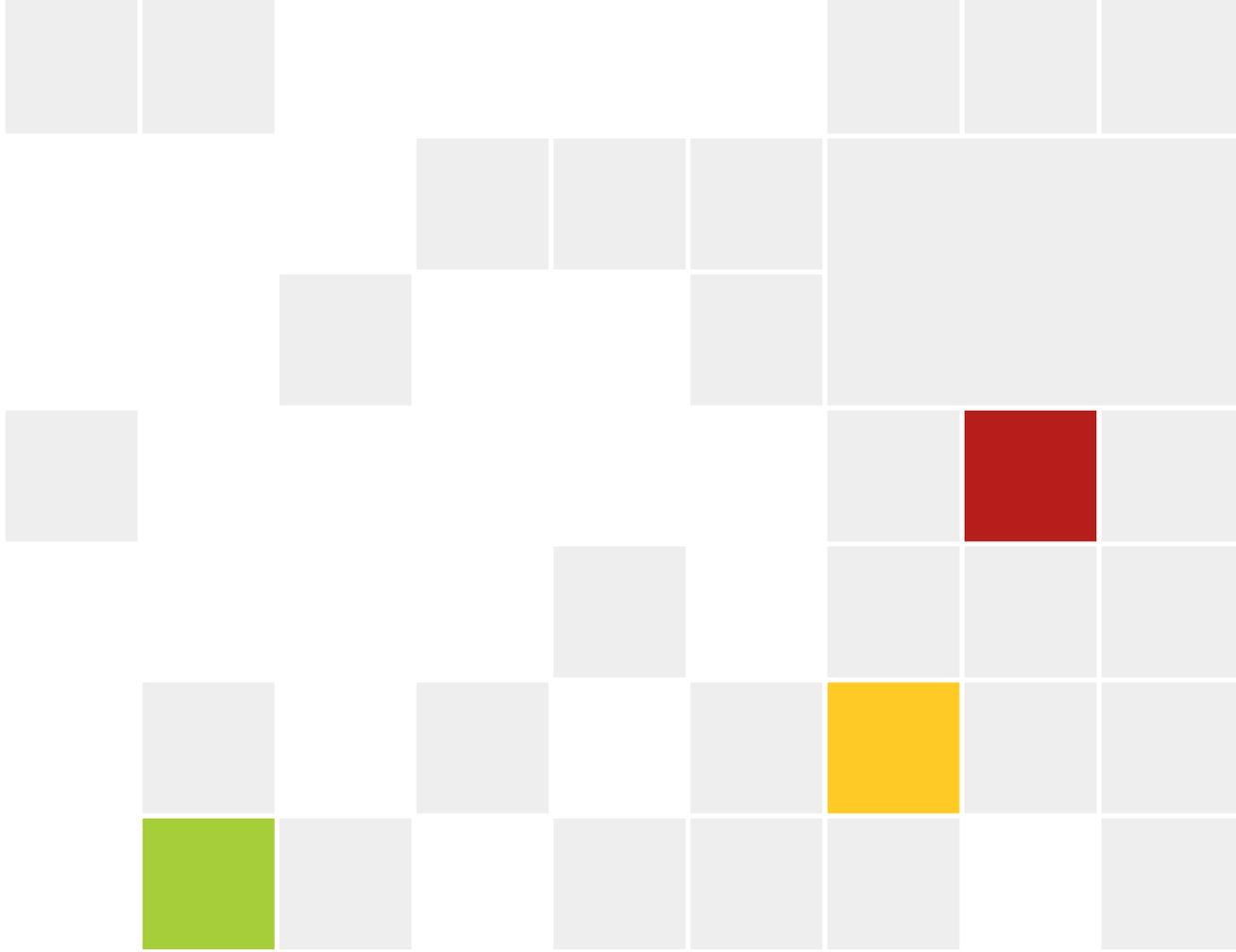
Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**



# South Kesteven Local Plan Representations

Issues and Options Consultation



**Boyer**

Report Control

Project:	South Kesteven Local Plan Representations
Client:	Nick Wade
Reference:	20.3020
File Origin:	
Primary Author	DH
Checked By:	LM

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	30/10/2020	Draft	LM

## **TABLE OF CONTENTS**

1. Introduction	2
2. Section 2: The Vision and Objectives	4
3. Policies Not Intended To Be Subject To Significant Change	5
4. Possible Policies To Be Changed or Introduced	7

## 1. INTRODUCTION

- 1.1 This Representation has been prepared by Boyer on behalf of Nick Wade in respect of the South Kesteven Local Plan Review – Issues and Options. Nick Wade owns land within the village of Sedgebrook, specifically land between School Lane and Abbey Lane that would be suitable for a modest scale of infill development.
- 1.2 The South Kesteven Local Plan will set out the spatial strategy for the administrative area of South Kesteven up to 2041. The Sustainability Appraisal produced by AECOM sits behind the Issues and Options consultation document as the main evidence based document to inform the strategy.
- 1.3 These representations relate specifically to the land within the village of Sedgebrook as set out in the below plan. They represent two separate small scale infill opportunities for residential development within the built up area of Sedgebrook. Both sites have been submitted separately to the Call for Sites.

Figure 1: Land east of School Lane and south of Abbey Lane



1.4 The proceeding sections of this Statement addresses in turn each of the relevant questions in the Consultation Response Form and assesses if the South Kesteven Local Plan Review – Issues and Options Consultation has been prepared in accordance with legal and procedural requirements.

1.5 As set out in paragraph 35 of the Revised Framework (2019), Local Plans are considered ‘sound’ if they are;

*‘a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.’*

## 2. SECTION 2: THE VISION AND OBJECTIVES

### Question 1a – The Vision

*So you agree that the Vision should be broadly the same for the new plan but the updated with respect to the plan period and housing growth level?*

- 2.1 The broad distribution of development is sound. The concern expressed within these representations is how the policies within the plan fail to facilitate the Council's vision for all villages to "retain their diversity and vitality, with thriving communities, well planned and carefully managed development". It is also contended that the policies fail to address the significant shift in National Policy with specific reference to Paragraph 68 of the Framework.
- 2.2 The restrictive nature of Policies SP3 and SP4 in the adopted Local Plan do not facilitate the necessary growth needed in smaller villages to retain vitality. Villages such as Sedgebrook have seen almost no new development in recent years that has resulted in the decline in local services and the general vitality of the village. The Plan should facilitate modest and proportionate growth to all villages so the benefits of development are experienced across the District.

### 3. POLICIES NOT INTENDED TO BE SUBJECT TO SIGNIFICANT CHANGE

#### Question 3 – Policies Not Proposed For Significant Change.

*Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details*

- 3.1 The latest National Planning Policy Framework puts more emphasis on the value of small and medium sized sites. Paragraph 68 states that they can make an important contribution to meeting the housing requirement of an area, and are often built- out relatively quickly. To promote the development of a good mix of sites local planning authorities should identify through the development plan at least 10% of their housing requirement on sites no larger than one hectare. They should also support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes.
- 3.2 This is a significant shift in Policy that needs consideration in the Local Plan Review. The current distribution of housing and policy for determining the suitability of windfall sites needs to be amended to better facilitate this type of development.
- 3.3 Policy SP3 is too restrictive in its current form. Particularly in its requirement that infill development must be:

*“within a substantially built up frontage or re-development opportunity (previously developed land”*

This stifles development and is too prescriptive in its restriction of development. It should be at the judgement of the decision maker whether a proposal is acceptable based on the three other criteria:

*b. It is within the main built up part of the settlement*

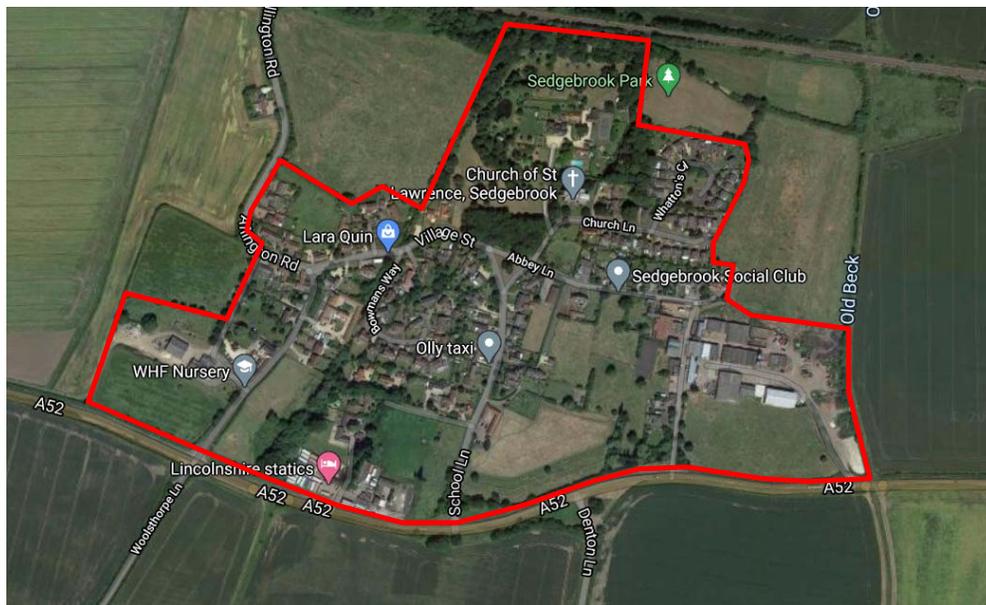
*c. It does not cause harm or unacceptable impact upon the occupiers amenity or adjacent properties*

*d. It does not extend the pattern of development beyond the existing built form; and it is in keeping with the character of the area and is sensitive to the setting of adjacent properties.*

These three criteria combined would give the decision maker the tools needed to make a judgement whether a slightly larger form of development was suitable.

- 3.4 If it was necessary and appropriate to do so the Council could ensure each village identified within policy SP2 had a defined settlement boundary that would specifically define the meaning of criteria “b” of Policy SP3. This might provide comfort that the Policy only resulted in the better use of land within the villages. In the case of Sedgebrook the settlement boundary could incorporate those small paddocks within the built up area of the village that are clearly suitable for modest infill development.
- 3.5 Below is a plan showing an appropriate settlement boundary for Sedgebrook that incorporates all of the “main built up area of the settlement” as defined by Policy SP3. It also incorporates clear defensible boundaries so any “infill development” retains the existing character of the village in recognition of criteria “d”. Development on land within the Settlement Boundary would then need to be assessed to ensure it does not cause harm or unacceptable impact upon the occupiers amenity or adjacent properties and is in keeping with the character of the area and is sensitive to the setting of adjacent properties.

Proposed Settlement Boundary Plan - Sedgebrook



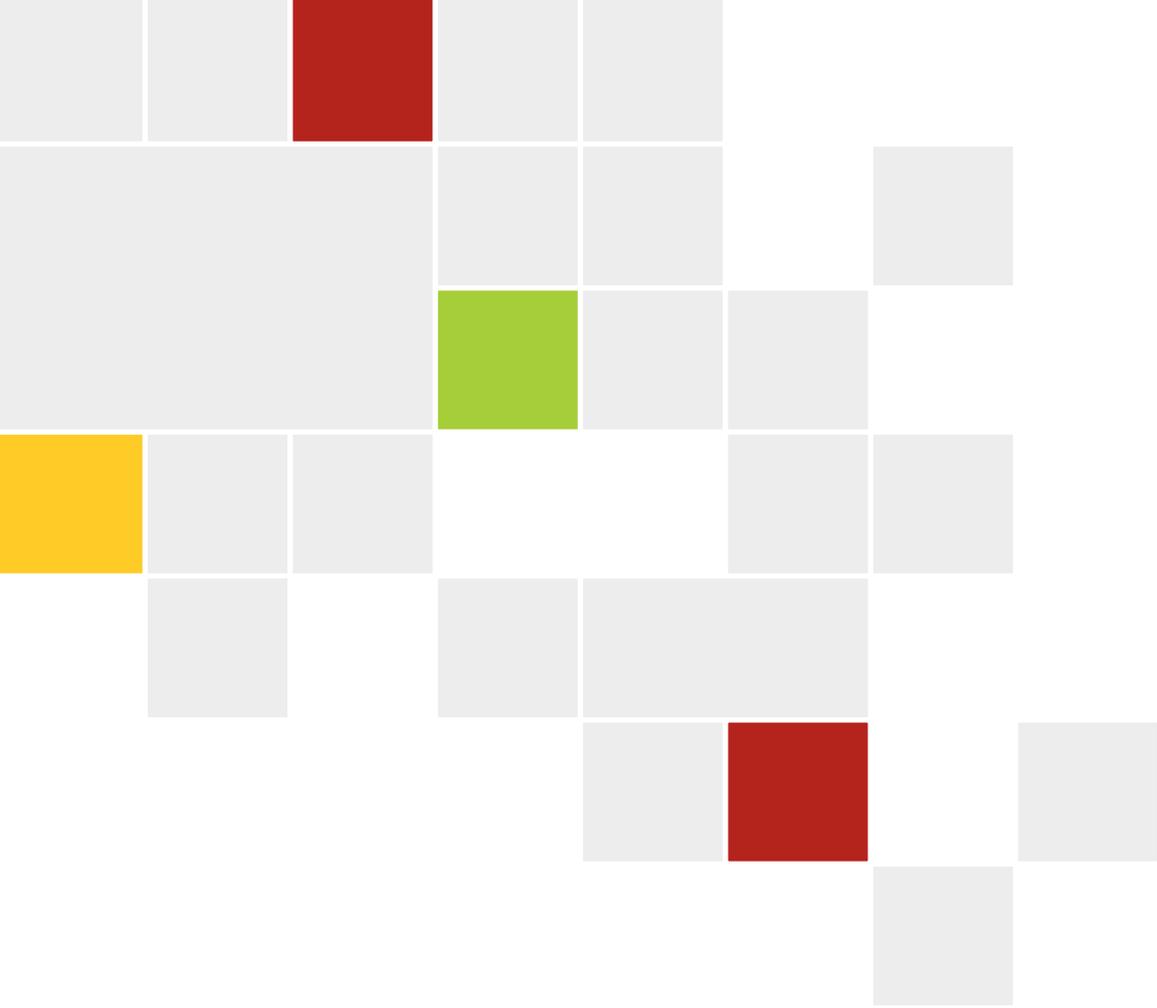
## 4. POSSIBLE POLICIES TO BE CHANGED OR INTRODUCED

### Question 7d

*Do you agree that it is not appropriate to make allocations in smaller settlements with South Kesteven whilst recognising that some development will occur through “windfalls”? If not, please provide details and any alternative proposals.*

- 4.1 It can only be “not appropriate” to make allocations to small villages if the Policy that facilitates windfalls is sufficiently flexible to allow development to occur to meet the Council’s vision of retaining the vitality of all villages. The current wording of Policy SP3 does not allow such development to occur as it is restrictive in only permitting development on sites within a substantially built up frontage. Opportunities of this very specific nature are very limited and are not sufficient to meet the Council’s aspiration of delivering 4% of the housing requirement in Other Settlements.
- 4.2 In addition to the proposed amendments to Policy SP3 in Section 3 above it might be appropriate for the Council to consider how the Settlement Hierarchy could be amended to meet the Council’s vision for villages. It is also appropriate, in light of Paragraph 68 of the Framework to consider whether 4% is a high enough distribution of housing to smaller villages if 10% of the housing requirement is to be delivered to small and medium sized sites of less than one hectare.
- 4.3 The current table contained on Page 16 of the consultation document shows that 893 dwellings are expected to be delivered on windfall sites out of a total supply of 19,076. This represents 4.6% of the supply which falls significantly short of the requirement of 10% for smaller sites in Paragraph 68 of the Framework. For the Council to increase this to 10% then 60 dwellings per year would need to be delivered through windfall sites. To double the windfall contribution, policy SP3 would need to be amended so slightly larger windfall sites within villages could be considered suitable for residential development.
- 4.4 The neighbouring North Kesteven District Council, under the Central Lincolnshire Local Plan have adopted a Local Plan that apportions growth to all villages commensurate to their size and function. For medium villages such as Sedgebrook it would be expected to accommodate a limited amount of development in order to support its function and sustainability. Typically this would be development proposals up to 9 dwellings or 0.25 hectares for employment uses. There are caveats to this including retaining the core shape and form of the settlement; not significantly harming the settlement’s character and appearance and; not significantly harming the character and appearance of the surrounding countryside or the rural setting of the settlement.

- 4.5 Central Lincolnshire have a further tier of “Small Villages” which is still less restrictive than Policy SP3 in allowing small scale development of up to 4 dwellings. This policy of allowing all settlements to grow in a proportionate and appropriate manner is much more effective in meeting Central Lincolnshire’s similar vision of retaining sustainable, thriving local communities in their villages.
- 4.6 The Council’s Sustainability Appraisal explores the possibility of facilitating an additional tier of growth in smaller villages. Presumably, this would be akin to the Settlement Hierarchy approach in North Kesteven. We support this approach.
- 4.7 In the appraisal the option scores poorly as it is considered that small villages are sensitive in terms of heritage and landscape impact. This is a generalisation as development within the built up area of Sedgebrook would have a minimal landscape and heritage impact. The appraisal also refers to poor connectivity and access to services. Sedgebrook is highly accessible as it is adjacent to the A52 and benefits from a regular bus service. There are suitable opportunities within small villages for slightly larger forms of development than that allowed under Policy SP3.
- 4.8 It may be appropriate to identify an additional tier where a slightly larger forms of development are supported, above that of Policy SP2. This may not necessarily involve allocating sites but could involve a more flexible wording of Policy SP2 being applied to windfall sites in this new tier of settlements. This would help to facilitate slightly larger yet still modest forms of development in more sustainable/accessible small settlements.
- 4.9 In summary, Policies SP2 and SP3 are too restrictive and will not facilitate sufficient windfall development within villages to either meet the Council’s vision or to meet the latest Framework requirement of delivering significantly more development on windfall sites (less than one hectare). We have included within these representations a variety of options of how slightly larger forms of windfall development could be supported in appropriate locations through amendments to these two policies.



Boyer



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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

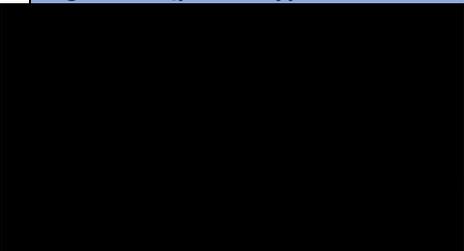
**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		Mrs
First Name		Gabrielle
Last Name		Rowan
Organisation	Longhurst Group Ltd & Jabberwocky Investments Ltd	Pegasus Group
Address		
Postcode		
Telephone		
Email Address		

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23.11.2020

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No	x	Unsure	
If not please provide details.					
<p>It is considered that the Vision for Bourne should be updated to remove reference to the role of the Neighbourhood Plan in allocating residential sites. It is considered that the Local Plan should allocate housing sites in Bourne and not defer this to the Neighbourhood Plan. In relation to such a key strategic subject such as housing delivery in a sustainable main town, it is considered that the most suitable approach would be for the Local Plan to identify and deliver housing allocations which the Neighbourhood Plan process can then assist and support with the local level detail required at a later stage. Other settlements in SKDC do not use the Neighbourhood Plan to allocate residential sites.</p> <p>By delaying the identification of these housing sites until an advanced stage of the Neighbourhood Plan process, there is a risk that this will significantly delay the strategic housing delivery for Bourne and the District; risk the Local Plan not meeting its strategic objectives and not identifying adequate housing in order to provide the benefits to Bourne.</p> <p>The vision for South Kesteven is to support the network of towns and villages to grow and develop and provide a range of accessible services. The allocation of housing sites via the Bourne Neighbourhood Plan restricts this element of the South Kesteven Vision.</p> <p>The vision for Bourne states that its role as a distinctive market town role will be further developed. However, the lack of housing allocations is constraining this. This in turn is impacting the town’s ability to support its own economy and the wider District economy, another aspect of the Vision. The lack of housing allocations has resulted in a complete lack of affordable housing delivery in the town (affordable housing delivery as at 2019/20 is 0), which is significantly impacting the ability of <i>“all sections of the community to enjoy a sustainable way of life”</i> – another essential element of the Vision for Bourne.</p> <p>The role of the Neighbourhood Plan in delivering the housing allocations for Bourne as part of the current Local Plan has not been successful. This current requirement is to deliver 100 houses during the plan period. As part of the Local Plan review, this housing requirement is set to increase to 364-746 houses up to 2041, which is considerably more significant and beyond the ability of the Neighbourhood Plan.</p> <p>Therefore, housing site allocations in Bourne should be identified in the Local Plan as part of this review and the Vision revised accordingly.</p>					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	

If not please provide details.

N/A

## 6. Proposal 2 - Objectives

### Q2 – Objectives

Do you agree that the Objectives should remain the same for the new plan?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not please provide details.

## 7. Proposal 3 – Policies not proposed to be changed significantly

### Q3 – Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not please provide details.

#### Adopted Local Plan Policy SP4

It is considered that Local Plan policies which restrict residential development in sustainable locations should be reviewed in order for SKDC to meet the emerging increased housing requirement. The Local Plan Review is seeking to increase housing provision to at least 754 houses per annum (up from 650 houses per annum in the Adopted Local Plan). In order to achieve this increase in supply within the Plan period, it will be necessary to allow development in sustainable locations on the edge of settlements. Local Plan Policy SP4 is a restrictive policy and does not allow for adequate sustainable development on the edge of settlements.

#### Adopted Local Plan Policy H4

It is considered that Local Plan Policy H4 (criterion A) should be amended to emphasise the need for elderly care accommodation and the support that will be given to such schemes in view of the critical shortage of such accommodation in the District faced with an ageing population. In South Kesteven, the proportion of people over the age of 85 is 24% higher than the national profile. Indeed, the number of people in the oldest age band is forecast to more than double by 2035 – a rate of growth significantly outstripping the national trajectory. If Central Government deems the need to provide housing for older people as critical nationwide, the argument exists that it is more than critical across the District.

## 8. Proposal 4 – Plan Period

### Q4 – Plan Period

Do you agree with the proposed plan period up to 2041?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

N/A

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

N/A

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
-----	--	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

N/A

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	x	No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

It is fully supported that SKDC is seeking to increase the housing provision in the emerging Local Plan and to ensure that up-to-date evidence is used as a basis for this provision.

It is considered that 754 dwellings per annum should be a starting point to assess housing need as set out in the Issues and Options consultation document.

However, it is possible that this requirement will have to be increased further in order to ensure that SKDC is meeting all of its future Local Housing Need. Calculating Local Housing Need in SKDC using the Government's current Standard Method results in a requirement of 767 houses per annum. Proposed changes to the way that Local Housing Need is calculated using the Government's new Standard Method shows a potential increase for SKDC to 839 houses per annum.

It is acknowledged that these changes are subject to consultation and change but it would be worthwhile for the Council to plan for houses in the range of 767-839 dwellings per annum to take into account affordability issues and to ensure that the Plan is flexible to respond to a changing housing position and to up-to date evidence.

### 11. Proposal 7 – Distribution of Growth

#### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details and any alternative proposals.

#### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

It is considered that Bourne is a sustainable location for growth and as a main Market Town should have a significant proportion of the housing allocations. It is suggested in the Issues & Options consultation that 8-10% of the District's housing provision should be located in Bourne. This equates to a range of 364-746 houses to be provided up to 2041. It is considered that housing allocations should be towards the higher of this range to ensure that adequate housing is provided in this sustainable location which suffers from a lack of affordability for a significant proportion of the population. Average house prices in Bourne far exceed average salaries, and even private rental is beyond the reach of many. Households on the average local income can only borrow £153,000 - even on a 90% mortgage - significantly below the average house price of c£230,000.

As set out in the response to question 6, it is likely that the housing provision in South Kesteven will be increased when Local Housing Need is calculated using the new Standard Method (up to 839 dwellings per annum). Therefore, it may be likely that Bourne will need to provide in excess of 746 houses in order to meet this increased housing requirement and to address affordability issues.

It is considered that the Local Plan should allocate housing sites in Bourne and not defer this to the Neighbourhood Plan. In relation to such a key strategic subject such as housing delivery in a sustainable main town and in view of the significant level of housing to be identified, it is considered that the most suitable approach would be for the Local Plan to identify and deliver housing allocations which the Neighbourhood Plan process can then assist and support with the local level detail required at a later stage.

By delaying the identification of these housing sites until an advanced stage of the neighbourhood plan process, there is a risk that this will significantly delay the strategic housing delivery for Bourne and the District; risk the Local Plan not meeting its strategic objectives and not identifying adequate housing in order to provide the benefits to Bourne.

The role of the Neighbourhood Plan in delivering the housing allocations for Bourne as part of the current Local Plan has not been successful and therefore housing site allocations should revert back to the Local Plan as part of this review.

Please refer to the response to the call for sites exercise submitted on behalf of Longhurst Group Ltd & Jabberwocky Investments Ltd in relation to a potential residential site at land off Beauford Drive, Bourne.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

N/A

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please provide details

It is considered that affordability should be a key factor in determining the level of growth required. (see response to Q7b)

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

N/A

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

N/A

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

N/A

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

N/A

**15. Proposal 11 – Energy Performance Standards****Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

N/A

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

N/A

**16. Proposal 12 – Need for Caravan Accommodation****Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

N/A

**17. Proposal 13 – Parking Standards****Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
-----	--	----	--	--------	--

**Please give details**

N/A

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

Please see response to Call for Sites on behalf of Longhurst Group Ltd & Jabberwocky Investments Ltd in relation to land off Beaufort Drive, Bourne.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

The Sustainability Appraisal does not properly evaluate the benefits which would ensue in directing additional housing growth to the Market Towns of Stamford, Bourne and The Deepings (Option MT2). The appraisal is skewed to illustrate that either Option MT1 or Option MT3 delivers the better outcomes when measured against sustainability, environmental and economic measures. However, the benefits of the provision of more housing (Option MT2) are not considered properly for example better housing affordability, benefits to existing population and community, health and wellbeing improvements to primary care services, public transport improvements and enhanced economic vitality.

It is considered that the sustainability appraisal should re-assess the benefits of Option MT2 and the assessment should be altered accordingly.

Thank you for responding to this consultation.



20 November 2020  
Issues and Options Grantham Estates Stamford Land 01

Planning Policy Team  
South Kesteven District Council  
St Peters Hill  
Grantham  
Lincolnshire  
NG31 6PZ

Lynette Swinburne BSc (Hons) Dip TP MRTPI



By email to: [Planningpolicy@southkesteven.gov.uk](mailto:Planningpolicy@southkesteven.gov.uk)

Dear Sir or Madam,

**SKDC LOCAL PLAN REVIEW (2044)  
ISSUES AND OPTIONS, REGULATION 18  
NOVEMBER 2020**

Savills (UK) Ltd are instructed on behalf of Grantham Estates, to submit representations in response to the SKDC Local Plan Issues and Options consultation (Regulation 18).

This letter comprises our representation in respect of the following consultation question:

**QUESTION 14 – Any Other Comments Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

In particular, our client wishes to make representations in relation to part of housing allocation STM-H2 which they believe would be better included within the Plan as part of employment allocation ST-E1. The comments relate to the parcel of land immediately to the north of that part of STM1-H2 which has planning permission for 100 houses (reference S17/0613).

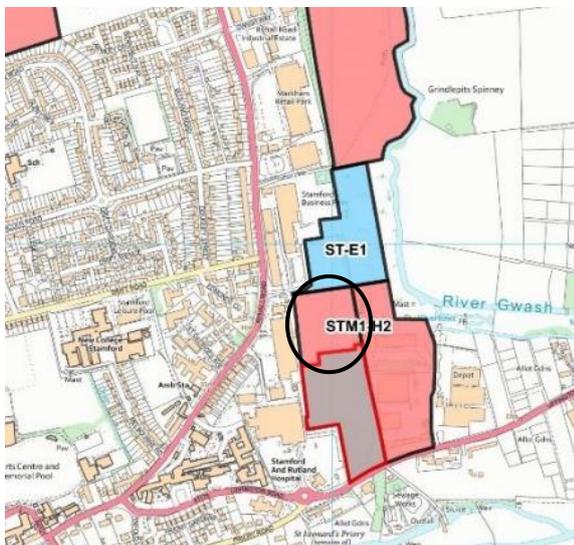


Figure 1: Site Location





The site is immediately adjacent to land within the ownership of Grantham Estates. Grantham Estates' land, which is to the west of the allocation, is in use for retail and commercial activities and have been successfully operating from here for many years.

The concerns of Grantham Estates can be summarised as follows:

- The proximity of the residential allocation may have a negative impact on the commercial and industrial businesses ability to operate.
- The land would be better suited to employment uses such as B1, B2 and B8 to complement those which adjoin to the north and west.
- It would be possible to connect the land in question to the road infrastructure of the adjacent employment uses.

It is therefore recommended that Local Plan Review considers the reallocation of the northern part of STM-H2 from residential uses to employment uses (B1, B2 and B8) as part of ST-E1.

I would be grateful if you could keep me updated in relation to the next stage of the Local Plan process.

Please do not hesitate to contact me should you require any further information.

Yours faithfully,

**Lynette Swinburne MRTPI**  
Associate Director, Savills (UK) Ltd

For Official Use Only:

REF: SK.IAO.0096

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Michael	
Last Name	Swann	
Organisation	N/A Private Resident	
Address	██████████ ██████ ███	
Postcode	██████	
Telephone	██████████	
Email Address	████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	20.11.2020.

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**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No	x	Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	X	No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	X	No		Unsure	
If not please provide details.					
Yes as far as they go.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	X	No		Unsure	
If not please provide details.					
Only if it includes Bourne T.C and The Residents of Bourne in consultation and to include the neighbourhood plan. In the allocation of housing sites in Bourne to 2036.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No	X	Unsure	
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not, please provide details of what changes you think should be made.

It should be retained exactly and not altered in any way.
-----------------------------------------------------------

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

Where would these be placed.
------------------------------

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

Dwellings should meet the needs of the people e.g. older people and first time buyers

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

Because of the lack of infrastructure and facilities growth. To many empty business premises.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	x	No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes		No	X	Unsure	
-----	--	----	---	--------	--

**If not, please provide details and any alternative proposals.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes	X	No		Unsure	
-----	---	----	--	--------	--

**Please provide details**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

Yes		No	X	Unsure	
-----	--	----	---	--------	--

**If yes, please provide details.**

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

Yes		No		Unsure	X
-----	--	----	--	--------	---

**If not, please provide details.**

I do not know the specific content of E1 and E2 to comment.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	X
-----	--	----	--	--------	---

If not, please provide details.

I do not know the specific content of E3 to comment.

#### 14. Proposal 10 – Climate Change

##### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

However, developers must be made to stick to the original submitted plan following application with no amendments.

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	X
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##### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	X
-----	--	----	--	--------	---

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	X	Unsure	
-----	--	----	---	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	X	No		Unsure	
-----	---	----	--	--------	--

Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

When applying for planning clarity on the exact location must be detailed.  
Must take into account the role of Bourne neighbourhood plan and the Town Council and residents when choosing development locations up to 2036.

Local residents made their feelings well known that they do not want to see any developments to the west of Bourne close to Bourne Woods. Over 400 people have objected to this previously.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

None.

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0097

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

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The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mrs	
First Name	Christine	
Last Name	Swann	
Organisation	N/A Private Resident	
Address	██████████ ██████ ███	
Postcode	██████	
Telephone	██████████	
Email Address	████████████████████	

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	20.11.2020.

--	--

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not please provide details.

--

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not please provide details.

--

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not please provide details.

Yes as far as they go.

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not please provide details.

Only if it includes Bourne T.C and The Residents of Bourne in consultation and to include the neighbourhood plan. In the allocation of housing sites in Bourne to 2036.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not, please provide details of what changes you think should be made.

It should be retained exactly and not altered in any way.
-----------------------------------------------------------

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

Where would these be placed.
------------------------------

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

Dwellings should meet the needs of the people e.g. older people and first time buyers

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No	x	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

Because of the lack of infrastructure and facilities growth. To many empty business premises.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes		No	X	Unsure	
-----	--	----	---	--------	--

**If not, please provide details and any alternative proposals.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes	X	No		Unsure	
-----	---	----	--	--------	--

**Please provide details**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

Yes		No	X	Unsure	
-----	--	----	---	--------	--

**If yes, please provide details.**

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

Yes		No		Unsure	X
-----	--	----	--	--------	---

**If not, please provide details.**

I do not know the specific content of E1 and E2 to comment.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	X
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If not, please provide details.

I do not know the specific content of E3 to comment.

#### 14. Proposal 10 – Climate Change

##### Q10 – Climate Change Policies

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	X	No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

However, developers must be made to stick to the original submitted plan following application with no amendments.

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	X
-----	--	----	--	--------	---

##### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	X
-----	--	----	--	--------	---

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

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**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	X	Unsure	
-----	--	----	---	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	X	No		Unsure	
-----	---	----	--	--------	--

Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

When applying for planning clarity on the exact location must be detailed.  
Must take into account the role of Bourne neighbourhood plan and the Town Council and residents when choosing development locations up to 2036.

Local residents made their feelings well known that they do not want to see any developments to the west of Bourne close to Bourne Woods. Over 400 people have objected to this previously.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

None.

**Thank you for responding to this consultation.**

**Amy Bonfield**

---

**From:** Philip Ashbourn [REDACTED]  
**Sent:** 23 November 2020 19:50  
**To:** PLANNING POLICY  
**Subject:** SKDC LOCAL PLAN REVIEW 2041  
**Attachments:** I\_O\_Response\_Form\_v41 (7).docx

**Categories:** Yellow Category

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Please find my comments attached.Thanks for previous information re the Harrowby Road allotments.

My main concerns with the current plan is that it does not attack climate change or meet the housing needs of the young and old; The latter has hit the media headlines in the last few days. It is not just the numbers that are important but the mix.

At the same time the Government has just called for new housing to be provided within existing settlements with easy walking and cycling distances to facilities and.not on the edges where car dominant estates prevail.

Thanks

Philip Ashbourn

For Official Use Only:

REF: SK.IAO.0098

CN:

ADD:



SOUTH  
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COUNCIL

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Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Mr	
<b>First Name</b>	Philip	
<b>Last Name</b>	Ashbourn	
<b>Organisation</b>		
<b>Address</b>	<div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 100%; height: 15px; margin-bottom: 5px;"></div>	
<b>Postcode</b>	<div style="background-color: black; width: 100%; height: 15px;"></div>	
<b>Telephone</b>	<div style="background-color: black; width: 100%; height: 15px;"></div>	
<b>Email Address</b>	<div style="background-color: black; width: 100%; height: 15px;"></div>	

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**3. If you are not already on our consultation database and you respond your details will automatically be added to the database**

<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
<div style="background-color: black; width: 100%; height: 15px;"></div>	23 November 2020

**Part B: Issue and Options Consultation Questions**

**5. Proposal 1 – 2036 Vision for South Kesteven**

**Q1a – The Vision**

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes		No x		Unsure	
-----	--	------	--	--------	--

If not please provide details.

The vision needs to be for the more radical in challenging climate change and meeting housing needs for the young and the old.

**Q1b – The Vision**

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No x		Unsure	
-----	--	------	--	--------	--

If not please provide details.

See above

**6. Proposal 2 - Objectives**

**Q2 – Objectives**

Do you agree that the Objectives should remain the same for the new plan?

Yes		No x		Unsure	
-----	--	------	--	--------	--

If not please provide details.

See above

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No x		Unsure	
-----	--	------	--	--------	--

If not please provide details.

See above

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<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not, please provide details of what changes you think should be made.					
<b>Q5b – Settlement Hierarchy Methodology</b>					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not, please provide details of what changes you think should be made.					
<b>Q5c – New Settlement</b>					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If so, please outline any suitable and deliverable proposals.					

--

<b>10. Proposal 6 – Housing Need and Requirement</b>					
<b>Q6 – Housing Need and Requirement</b>					
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?					
Yes		No x		Unsure	
If not, what evidence do you have to justify an alternative need and requirement?					
Types of housing are as important as numbers. The great need is for affordable housing to rent or buy for young people and sheltered housing for elderly people. This housing could be provided within towns, meeting current policy to build new housing within existing settlements and not on the edges on car dominant estates. This would also encourage walking and cycling to existing facilities to improve health and reduce pollution.					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
Do you agree that Grantham should remain as the focus for growth in South Kesteven?					
Yes x		No		Unsure	
If not, please provide details and any alternative proposals.					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?					
Yes		No		Unsure	
If not, please provide details and any alternative proposals.					
<b>Q7c – Larger Villages</b>					
Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?					

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**  
 Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***  
 Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be

brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

--

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No x		Unsure	
-----	--	------	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

The Council needs to be far more challenging in every area. I accept that Government is sending out ever changing mixed messages but more radical policies need to be adopted that change the way we live it.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes x		No		Unsure	
-------	--	----	--	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

**Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?**

<b>Yes</b> xx		<b>No</b>		<b>Unsure</b>	
---------------	--	-----------	--	---------------	--

**Please give details.**

**Q11c – Viability Implications of Higher Energy Performance Standards**

**If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?**

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**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

**Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

**Please give details**

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

**Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.**

<b>Yes</b> x		<b>No</b>		<b>Unsure</b>	
--------------	--	-----------	--	---------------	--

**Please give details**

**Do you mean car parking? The provision of more and more roads and car parking has to be challenged if we are to fight climate change.**

Cycle parking standards are also needed.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0099

CN:

ADD:



SOUTH  
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**South Kesteven District Council Local Plan Review  
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The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Clerk to the PC	
First Name	Peter	
Last Name	Armstrong	
Organisation	Londonthorpe & Harrowby Without PC	
Address	██████████ ██████████	
Postcode	██████████	
Telephone	██████████	
Email Address	████████████████████████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes		No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					

6. Proposal 2 - Objectives					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	
If not please provide details.					

7. Proposal 3 – Policies not proposed to be changed significantly					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	
If not please provide details.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes

No

Unsure

If not please provide details

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes

No

Unsure

If not, please provide details of what changes you think should be made.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes

No

Unsure

If not, please provide details of what changes you think should be made.

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes

No

Unsure

If so, please outline any suitable and deliverable proposals.

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

------------------------------------------

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

------------------------------------------

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
------------	--	-----------	--	---------------	--

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

<b>Yes</b>	<b>y</b>	<b>No</b>		<b>Unsure</b>	
------------	----------	-----------	--	---------------	--

If yes, please provide details.

The council feels the local plan fails to address the needs of the Gypsy and Traveller community on several counts. Firstly, the local plan is able to identify development sites for 19,000 new homes many of these are within our parish but not one pitch for the Gypsy and Traveller community.

Secondly, it makes reference to the Gypsy and Traveller Accommodation Assessment 2016 (GTAA) which identifies the need for 32 pitches and was completed and adopted by the Council without any consultation with the local residents.

The specific lack of provision in the plan for these pitches means that any application in relation to Gypsy and Traveller sites puts the local planning department in a difficult position, in that the criteria in H5 are ignored and planning applications drive the planning policy. That is to say, the need to meet the GTAA recommendations is greater than the quality of the development.

For example, the local plan review ignores the fact that the planning application at Cold Harbour is under appeal. The developers are convinced that they will win the appeal base on hundreds of other appeals over-turned across the country. The statistical likelihood is that it will also occur with this appeal. The Planning Department recommended the original application despite only meeting one of the five criteria set out in H5 in the emerging local plan. (This has been demonstrated already within our parish with the one allowed on Harrowby Lane.) (See below)

The site is at the confluence of the A52 and the High Dike, a small triangular piece of land – in all intents and purposes – a traffic island which has approximately 14,000 vehicles per day encircling it at speeds up to 70 miles per hour. (Bordered by our parish on the west)

Several applications in nearby Old Somerby have been rejected on the basis that they are not in keeping with the village, however, this is not a consideration adopted by the planning Department for the Cold Harbour application, a very small and isolated hamlet of 7 houses, one of which is Grade II listed.

The secrecy with which the GTAA recommendations have been pushed through highlights the stealth and underhand way in which planning applications like the one at Harrowby Lane have been conducted. The original application was granted for 2 pitches only to be occupied by one family. After period of about a year another application for a day block was made with cooking and washing facilities. During both the application processes no reference to the GTAA was made. Had this been included then it would be clear that the intention always was to expand the site to 6 pitches, opening it up to more families. It, therefore, can be interpreted that, as in the recommendation of the GTAA for Cold Harbour, the development at Cold Harbour will be expanded from 6 to 25 pitches. That would see an increase of the local population of the hamlet by nearly 500%.

In summary, the local plan states in H5:

- a. *the proposed site provides an acceptable living environment for its residents.*
- b. *the site has good access to the highway network and will not cause traffic congestion or safety problems.*

Both of these criteria should have rejected the application at Cold Harbour by the planning officers given its location, but the officers instead recommended it

- c. *the site is in reasonable proximity to shops, schools, and health facilities.*

Again, given Cold Harbour's isolation and rural location there is no reasonable proximity to anything, no public transport not even a footway or streetlight.

- d. *the site is not identified as an area at risk of flooding in the Strategic Flood Risk Assessment (SFRA). This is the only criteria which the application passes.*

- e. *the scale and layout of the site will respect its relationship with any residential (settled) community and not place undue pressure on the local infrastructure.*

With the GTAA recommendation that the site at Cold Harbour would accommodate 25 pitches (let's say 50 adults and 40-50 children) then this would completely overwhelm the established community of 15 adults and 8 children and would not be in keeping with the settled community. It would even outnumber the population of that part of Harrowby within ½ mile of the site.

The local plan does not identify any sites, suitable or otherwise. This in turn fails to provide suitable guidance for residents, developers, and planning officers alike. The necessity to meet the needs of the GTAA seems to override the local plan and its criteria in respect of Gypsy and Travellers.

It is evident that planning applications and developers are driving the planning policy here and that the council has no control, and moreover, the District Councillors cannot demonstrate their responsibility and accountability.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details.</b>					
<b>Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas</b>					
<b>Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details.</b>					

<b>14. Proposal 10 – Climate Change</b>					
<b>Q10 – Climate Change Policies</b>					
<b>Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.</b>					

<b>15. Proposal 11 – Energy Performance Standards</b>					
<b>Q11a Energy Performance Standards in Residential Development</b>					
<b>Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>Q11b – Energy Performance Standards in Non-Residential Development</b>					
<b>Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	

Please give details.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
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Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

**There does not seem to be any understanding of the governments drive for only new electric vehicles by 2030, no new petrol or diesel cars being sold. All new housing should have an accessible charging point at the property. At present planners are allowing homes to be built with no parking at the property.**

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

20 November 2020  
Issues and Options LCC 01



Planning Policy Team  
South Kesteven District Council  
St Peters Hill  
Grantham  
Lincolnshire  
NG31 6PZ

Lynette Swinburne BSc (Hons) Dip TP MRTPI

By email to: [Planningpolicy@southkesteven.gov.uk](mailto:Planningpolicy@southkesteven.gov.uk)

Dear Sir or Madam,

**SKDC LOCAL PLAN REVIEW (2044)  
ISSUES AND OPTIONS, REGULATION 18  
NOVEMBER 2020**

Savills (UK) Ltd are instructed on behalf of 'Lincolnshire County Council Corporate Property, to submit representations in response to the SKDC Local Plan Issues and Options consultation (Regulation 18).

This letter comprises our representation in respect of the following consultation questions:

- QUESTION 1a – The Vision Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.
- QUESTION 3 – Policies not proposed to be changed significantly Q4 – Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.

**PLANNING POLICY CONTEXT**

In making this submission it is pertinent to refer to national planning policy and guidance, namely that set out in the 2019 National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG).

The 2019 NPPF establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three dimensions to sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role.

***QUESTION 1a – The Vision Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.***

The Vision for The Deepings states:

*“The Deepings*

*will have further developed its distinctive market town role. Planned growth will take place through new developments mainly to the east of the town to meet local needs and respond to market demands. The Plan will seek to ensure that The Deepings’ defining assets, including heritage assets and accessible green space are retained and enhanced where possible. The economy of the town will be supported through the supply of appropriate land to develop a diverse, vibrant and modern economy to increase jobs, enhance prosperity and provide a better balance between housing and employment growth. The growth will be supported*



*by improvements to infrastructure and services and will enable all sections of the community to enjoy a sustainable way of life.”*

These representations accompany a site submitted into the Call for Sites ‘Land to the West Millfield Road/East of A15, Market Deeping’. The site, which is on the western side of Market Deeping is well located, and is enclosed by the A15 which extends along the entire western boundary of the town. It is bordered by extensive mature trees and hedging along its eastern, southern and western boundaries. As set out in the detailed site submission, it was previously considered as a suitable location for development and was proposed as an allocation for housing in the Regulation 18 Consultative Draft Local Plan 2017 (CDLP) under ‘DEP1 H2 (SKLP30) for 200 dwellings (indicative). At that time, the site was considered to be sound and deliverable.

The ‘Sites and Settlement Consultation’ in July 2016 (Regulation 18) presented an assessment of those sites submitted to the Council which had development potential. SKLP30 was identified as one of only three sites within Market Deeping which was ‘less constrained to housing development’. This site is of a scale which would enable a comprehensive level of development which could make a meaningful contribution to housing and community facilities, such as Public Open Space, in the area.

A recent planning application on the site, whilst refused on policy grounds, demonstrated that there are no technical reasons why the site would not be able to accommodate housing and its development, based on the indicative scheme would offer real benefits to the community, opening up this site, which does not have public access at present, and creating new areas of Public Open Space for residents.

It is therefore suggested that the Vision is updated, and the following removed or amended: ‘*Planned growth will take place through new developments mainly to the east of the town*’. Instead, the Vision should state ‘*Planned growth will take place through new developments mainly **on the edge of the town***’.

**QUESTION 3 – Policies not proposed to be changed significantly**

**Q4 – Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.**

Our client does not agree with the retention of Policy SP4 which states:

*“SP4: Development on the Edge of Settlements*

*Proposals for development on the edge of a settlement, as defined in Policy SP2, which are in accordance all other relevant Local Plan policies, will be supported provided that the essential criteria a – f below are met.*

*The proposal must:*

*a. demonstrate clear evidence of substantial support from the local community\* through an appropriate, thorough and proportionate pre-application community consultation exercise.*

*Where this cannot be determined, support (or otherwise) should be sought from the Town or Parish Council or Neighbourhood Plan Group or Forum, based upon material planning considerations;*

*b. be well designed and appropriate in size / scale, layout and character to the setting and area;*

*c. be adjacent to the existing pattern of development for the area, or adjacent to developed site allocations as identified in the development plan;*

*d. not extend obtrusively into the open countryside and be appropriate to the landscape, environmental and heritage characteristics of the area;*

*e. in the case of housing development, meet a proven local need for housing and seeks to address a specific targeted need for local market housing; and*

*f. enable the delivery of essential infrastructure to support growth proposals.”*

Specifically, it is criteria a. of the policy which is queried. Whilst not wishing to undervalue the importance of community consultation, a development proposal that is consistent with all other criteria under this policy should not be deemed to be unacceptable on account of there not being substantial community support.

In those settlements identified as suitable locations for growth, especially in the Market Towns, this policy requirement seems to be unnecessarily restrictive, placing a disproportional burden on developers in locations which South Kesteven have identified as important locations for growth. Infill within the settlement

boundary is not always possible at a scale which is sustainable due to limited infill opportunities, and constraints associated with brownfield land. Therefore, we are concerned that this restrictive approach to development on the edge of settlements may have an adverse impact on the delivery of housing in these areas.

Pre-application engagement with the community is good practice for many types of development, and is often a means of gaining useful input into the development of a scheme. To simply have a policy requirement to obtain 'substantial support' from the local community or support from the Town, Parish Council or Neighbourhood Plan Group/Forum does not recognise the value of the engagement process and how it can be used to shape and modify proposals. Whilst engagement with the community is generally supported as part of the application (or pre-application) process, a policy which has a requirement for '(substantial) support' at its heart, is considered to be too binary and not in the spirit of the presumption in favour of sustainable development, which is the golden thread running through the NPPF.

It is agreed that the other criteria listed in the first part of policy SP4 are fair and in the interests of securing appropriate development that respects the scale, form and pattern of the settlement. We also agree with the policy's criteria relating to rural exception sites for affordable housing.

Therefore, it is considered that criteria to the policy should be amended to remove a, which goes further than the NPPF in terms of securing support and places an additional barrier to achieving sustainable development. Instead, it is considered that the policy should focus on *engagement* to ensure that there are opportunities for the local community to meaningfully participate in the development of proposals as they evolve.

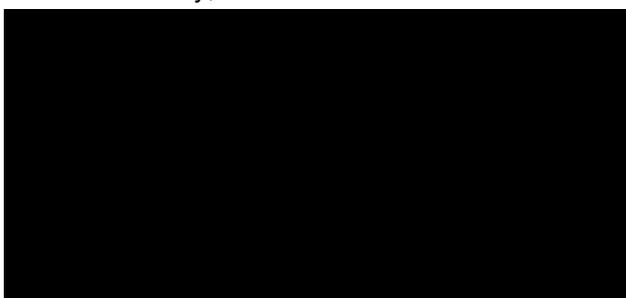
The White Paper 'Planning for the Future' (October 2020) recognises the need for increased democracy in the planning process and suggests measures to encourage as many people as possible to participate in planning. This approach could represent a way to encourage all the voices in a community to consider development opportunities, rather than the current system which is often dominated by the most vocal and sometimes single interest groups.

It is recommended that policy SP4 is amended to shift the focus away from a binary test about community support towards an approach that requires developers to proactively engage with a wide range of residents when schemes are being prepared.

I would be grateful if you could keep us updated in relation to the next stage of the Local Plan process.

Please do not hesitate to contact me should you require any further information.

Yours faithfully,



Associate Director, Savills (UK) Ltd



# BOURNE TOWN COUNCIL

Tel: [REDACTED]

South Kesteven District Council  
St Peters Hill  
Grantham

19<sup>th</sup> November 2020

## **South Kesteven District Council Local Plan Issues and Options (October 2020)**

Bourne Town Council welcomes the contents of the Plan (Issues and Options) and the opportunity for continued collaborative working with South Kesteven District Council.

The document recognises the relevant strategic matters to be addressed and the Town Council agree with the issues that have been identified and support the options being explored.

A detailed response to the consultation questions, as relevant to Bourne Town Council, is provided below.

### **Question 1a – The Vision**

At the present time the Neighbourhood Plan Committee and Bourne Town Council have been given the responsibility to determine where housing allocation should be placed up to 2036 and therefore until the plan is produced and gone through consultation there should be no further increase in allocation for Bourne.

Furthermore, any future allocation should take into consideration the significance of the position of the A15 corridor (it must also be borne in mind that when the A1 is closed the A15 becomes an alternative route for traffic travelling south).

Bourne Town Council feel that any new housing developments should meet the minimum standards required by the South Kesteven policy on sustainability

### **Question 1b – The Vision**

Whilst the Town Council is supportive of the vision it is the detail behind that vision that is important.

The infrastructure currently supporting the Town does not adequately meet the needs of the current and planned population nor does the vision address the economy of the Town Centre.

### **Question 4 – Plan Period**

The time period suggested will enable the Plan to have at least a 15 year horizon from the proposed adoption date of 2024 which is stipulated as a minimum in the latest NPPF. Although there may be benefits in having a longer plan period, this also means that the Local Plan review would need to plan for higher numbers of housing and increased employment provision over the longer time period. Given that the Government is stipulating that Plans will need to be regularly reviewed, new evidence may necessitate changes to housing and employment requirements in the short to medium term which means that the plan period suggested is preferable.

Public Office Hours: Monday to Friday 9.30am – 4.00pm

Email: [REDACTED]

### **Question 6/7 - Housing Need and Requirement/Distribution of Growth**

Whilst the Town Council has no reason to question the housing need and requirement it feels that the distribution of this requirement is somewhat loaded towards Bourne.

The table shown on page 16 of the consultation document shows completions from 2018 if the completions were shown from 2011 then following information is revealed.

Location	Net Completions April 2011- March 2020	Percentage of District Completions
Grantham	1551	31%
Stamford	831	17%
Bourne	1494	30%
The Deepings	489	9.85%

As previously stated the Neighbourhood Plan Committee in association with Bourne Town Council were given the responsibility to determine the siting of housing allocations through to the period 2036. As this is in process there should be no further increase for Bourne until the results of this process are known.

With regard to the proposal that Bourne should remain a focus for growth the Town Council are of the opinion that this would only be acceptable if there was a clear plan to support this growth with the relevant and much needed infrastructure.

### **Question 9a/9b – Revisions to Employment Policy**

The Town Council is in agreement with the proposal that they see no need to change the employment land strategy as set out in proposal 9 unless there is strong and robust evidence that the sites previously proposed are no longer suitable or deliverable. However, the Town Council does agree that employment allocations should be reviewed if an updated employment land study is completed and bearing in mind the planned continued growth of the Town.

The Town Council trust that you find their responses useful and constructive.

Yours Faithfully,

Ian Sismey  
Clerk to Bourne Town Council

Public Office Hours: Monday to Friday 9.30am – 4.00pm

Email: [REDACTED]



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Ms	
<b>First Name</b>	Jilliean	
<b>Last Name</b>	Marshall	
<b>Organisation</b>		
<b>Address</b>	██████████ ██████████ ██████████ ██████████ ██████████	
<b>Postcode</b>	██████████	
<b>Telephone</b>	██████████	
<b>Email Address</b>	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
████████████████████	23/11/2020

**Part B: Issue and Options Consultation Questions**

5. Proposal 1 – 2036 Vision for South Kesteven				
<b>Q1a – The Vision</b>				
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?				
Yes		No		Unsure
If not please provide details.				

<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes		No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes		No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	
If not please provide details.					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes		No		Unsure	
If not please provide details					

--

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

--

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details of what changes you think should be made.

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**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No		Unsure	
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Please provide details

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

--

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

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**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
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Please give details

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**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**With Proposal 10 (Climate Change) and Proposal 11(a) Energy Performance Standards for Residential Dwellings in mind**, whilst the report provides for new builds to adopt measures to adapt to climate change, and there is clearly incentive for homeowners to adopt recommendations to reduce their carbon footprint, I believe there is room to improve the incentive for landlords to adapt their properties to reduce same. I believe it would be beneficial to look at the energy assessment criteria used in the producing of Energy Performance Certificates to give a more balanced portrayal of energy ratings / performance and encourage the improvement of rental properties to help reduce the detrimental effect on the environment of ageing and inefficient heating and hot water systems and insulation irregularities.

The building of new homes, however energy-efficient, can only add to the carbon footprint and I feel it is important to be able to offset this with reductions in the carbon footprint of existing dwellings, most significantly those where no incentive currently exists for improvements in this

area.

My recent experience of the disparity between energy efficiencies in a rented and an owned property (of a similar energy rating) has been quite astonishing.

### **Part C: Sustainability Appraisal Scoping Report**

#### **19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0103

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Philip	
Last Name	Cupit	
Organisation	Barrowby Parish Council	
Address	██████████ ██████████ ██████████ ██████████ ██████ ██████████	
Postcode	██████████	
Telephone	██████████	
██████ Address	████████████████████	

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
██████████	23 <sup>rd</sup> November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>				
<b>Q1a – The Vision</b>				
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?				
Yes ✓		No		Unsure
If not please provide details.				
The vision should include proposals to ensure the sustainability of larger VILLAGES to avoid them becoming suburbs of the nearby towns. Villages are self- contained units and provision needs to be made to integrate new occupants with existing populations by the provision of enhanced social facilities.				
<b>Q1b – The Vision</b>				
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?				
Yes		No ✓		Unsure
If not please provide details.				
Climate change is only going to get worse for the foreseeable future. The vision needs to be more challenging and to set higher standards of expectations.				

<b>6. Proposal 2 - Objectives</b>				
<b>Q2 – Objectives</b>				
Do you agree that the Objectives should remain the same for the new plan?				
Yes		No ✓		Unsure
If not please provide details.				
It is important that ensuring a sense of place that is compatible to existing village communities To facilitate and sustain a network of sustainable communities which offer a sense of place, that are safe, inclusive and can respond to the needs of local people, establishing an appropriate spatial strategy that will guide the scale, location and form of new development across the District, providing the long term basis for the for the planning of South Kesteven. Objective 8 relates to transport infrastructure. Consideration needs to be given to an overhaul of traffic flow within the CBD of the town and the junctions at London Road/Bridge End Road (especially if a major development is to take place on Spitlegate Heath) and Manthorpe Road/Belton Lane if increased traffic is to come into town from the north and the north east of the town. Improvements in public transport are an absolute necessity.				

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>				
<b>Q3 – Policies not proposed to be changed significantly</b>				

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

Yes ✓		No		Unsure	
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**If not please provide details.**

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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

Yes ✓		No		Unsure	
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**If not please provide details**

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

Yes ✓		No		Unsure	
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**If not, please provide details of what changes you think should be made.**

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**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

Yes		No ✓		Unsure	
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**If not, please provide details of what changes you think should be made.**

**A shop that sells bread and milk is not a realistic village facility. Weightings of key factors need to be adjusted to be fairer.**

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**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

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Yes ✓		No		Unsure	
<b>If so, please outline any suitable and deliverable proposals.</b>					
Rather than spoil the existing character of existing villages, consideration should be given to creating new garden villages on green field sites adjacent but not conjoining with either the town or existing villages.					

<b>10. Proposal 6 – Housing Need and Requirement</b>					
<b>Q6 – Housing Need and Requirement</b>					
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?					
Yes ✓		No		Unsure	
<b>If not, what evidence do you have to justify an alternative need and requirement?</b>					
Provided that relatively small communities (larger villages) are given more than their fair share of expected development. Within the curtilage of Barrowby we already have an increase of 270 new houses on an existing community of approximately 800 houses. Barrowby has had more than its fair share of development under the existing plan. Barrowby should be overlooked for any further major development in the revised local plan.					

<b>11. Proposal 7 – Distribution of Growth</b>					
<b>Q7a – Focus of Housing Growth on Grantham</b>					
Do you agree that Grantham should remain as the focus for growth in South Kesteven?					
Yes ✓		No		Unsure	
<b>If not, please provide details and any alternative proposals.</b>					
Provided more is done to promote leisure and entertainment facilities and supporting infrastructure is improved.					
<b>Q7b – Stamford, Bourne and The Deepings</b>					
Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?					
Yes ✓		No		Unsure	
<b>If not, please provide details and any alternative proposals.</b>					
<b>Q7c – Larger Villages</b>					
Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?					
Yes		No ✓		Unsure	

**If not, please provide details and any alternative proposals.**

**But share the developments with those larger villages where little or no development has taken place recently. Barrowby Parish is having 800+ new houses within the next few years. Other villages should now be considered.**

**Q7d – Other Settlements**

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes		No ✓		Unsure	
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**If not, please provide details and any alternative proposals.**

**Some of the smaller villages would welcome modest further development and some are capable of taking additional modest development. Each should be considered. Continued development of larger villages will destroy their character and sense of place.**

**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

Yes ✓		No		Unsure	
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**Please provide details**

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

Yes		No ✓		Unsure	
-----	--	------	--	--------	--

**If yes, please provide details.**

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

Yes ✓		No		Unsure	
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**If not, please provide details.**

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes ✓		No		Unsure	
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If not, please provide details.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No ✓		Unsure	
-----	--	------	--	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

SKDC should influence the desirability of driving a fossil fuelled car into Grantham. Incentives should be offered for non-fossil-fuelled vehicles and petrol/diesel vehicles should be discouraged. A more comprehensive and frequent public transport system should be developed to enable the populations of larger villages to access the towns without using a private vehicle.

Building regulations and Planning decisions should insist on higher than minimum standards of insulation and glazing. Electrical charging points should be provided on all new residential dwellings and public and non-residential buildings should have publically accessible charging points available for visitors, clients and customers.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes ✓		No		Unsure	
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes ✓		No		Unsure	
-------	--	----	--	--------	--

Please give details.

As a general rule: Minimum requirements = 50%. E.g. triple glazing, insulation with 150% of minimum thermal values than currently required, useage of air or ground source heat pumps.

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

**Please give details**

We are all aware that insulation standards and glazing standards of 25/30 years ago are now felt to be woefully inadequate. We should be planning and providing to meet future needs not the minimum as is now required.

Housing development has proved to be a lucrative business in the 21<sup>st</sup> century as demonstrated by bonuses etc. for chief executives. Meanwhile the cost of energy has increased to householders, penalising the less well off members of our society. Maybe we need to question whether these large profits are socially and morally acceptable in this, the third decade of this century. Perhaps all big business should be pushed into having a social conscience and profits should be reduced in the interest of the common good rather than diminish contributions that otherwise might have been made to the community's benefit.

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No ✓		Unsure	
-----	--	------	--	--------	--

**Please give details**

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No ✓		Unsure	
-----	--	------	--	--------	--

**Please give details**

All new households should have as a minimum sufficient parking spaces for at least one car per bedroom

**18. Any other Comments**

**Q14 – Any other Comments**

**Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?**

**A constant commitment towards focussing development on the larger villages as well as the major urban conurbations will have a detrimental impact on the character and essence of these communities.**

**By definition, consistently increasing the sizes of the larger villages will eventually make them into small towns or suburbs of the major settlements, and their identities as separate villages will be destroyed. Change has to be managed. Facilities should be provided to enable an increasing population in villages to be subsumed into local village life.**

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0104

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	Mr
First Name	Steve	Nigel
Last Name	Louth	Harris
Organisation	Richborough Estates Ltd.	Boyer
Address	[Redacted Address Information]	
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23/11/2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No		Unsure	
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes		No		Unsure	
If not please provide details.					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					

**Do you agree with the proposed plan period up to 2041?**

Yes		No	<input checked="" type="checkbox"/>	Unsure	
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**If not please provide details**

Please see representation for more details.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

Yes	<input checked="" type="checkbox"/>	No		Unsure	
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**If not, please provide details of what changes you think should be made.**

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not, please provide details of what changes you think should be made.**

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If so, please outline any suitable and deliverable proposals.**

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?**

Yes		No	<input checked="" type="checkbox"/>	Unsure	
-----	--	----	-------------------------------------	--------	--

**If not, what evidence do you have to justify an alternative need and requirement?**

Please see representation for more details.

### 11. Proposal 7 – Distribution of Growth

#### Q7a – Focus of Housing Growth on Grantham

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

Yes		No		Unsure	
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**If not, please provide details and any alternative proposals.**

#### Q7b – Stamford, Bourne and The Deepings

**Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?**

Yes	<input checked="" type="checkbox"/>	No		Unsure	
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**If not, please provide details and any alternative proposals.**

Please see representation for more details.

#### Q7c – Larger Villages

**Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not, please provide details and any alternative proposals.**

#### Q7d – Other Settlements

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

Yes		No		Unsure	
-----	--	----	--	--------	--

**If not, please provide details and any alternative proposals.**

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

Please provide details

Please see representation for more details.

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes		No		Unsure	
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes		No		Unsure	
-----	--	----	--	--------	--

If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No		Unsure	
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
-----	--	----	--	--------	--

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes

No

Unsure

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes

No

Unsure

Please give details

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**

## Report Control

Project:	South Kesteven District Council Local Plan Representations
Client:	Richborough Estates Ltd
Reference:	
File Origin:	Document1
Primary Author	Laura McCombe
Checked By:	Nigel Harris

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	20/11/2020	Draft	DH
2	23/11/2020	Final	NH



## **TABLE OF CONTENTS**

1. Introduction	2
2. Response to Consultation Questions	4
Question 1a – The Vision	4
Question 1b – The Vision	4
Question 2 – Objectives	4
Question 4 – Plan Period	4
Question 5a – Settlement Hierarchy	5
Question 6 – Housing Need and Requirement	5
Question 7b – Stamford, Bourne and The Deepings	8
Question 7e – Consideration of the Market and Deliverability	12
3. Conclusion	14

## **APPENDIX**

Appendix 1 – Development Framework Plan

# 1. INTRODUCTION

- 1.1 This Representation has been prepared by Boyer on behalf of Richborough Estates Ltd in respect of the South Kesteven District Council Local Plan Review (2041) Issues and Options Report (2020).
- 1.2 The Council have now begun the review of their Local Plan in line with the Inspectors report which committed the Council to undertake an early review from April 2020 with submission by the end of December 2023. Once adopted, this Local Plan will form part of the Development Plan and will replace the current Local Plan (2011 - 2036).
- 1.3 The Local Plan Review subject of this representation will establish the planning framework for the District up until 2041. It will cover key issues such as housing provision, retail and town centres, infrastructure provision and the environment. As part of which, it will allocate land for housing, employment and retail uses and set out policies which planning applications will be determined against in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, section 70(2) of the Town and Country Planning Act 1990 and paragraph 2 of the Revised Framework (2019).
- 1.4 The Council published their Local Development Scheme in August 2020 which sets out a projected timescale for the Local Plan Review. It identified the following consultation periods; Issues and Options Local Plan (Regulation 18) in October 2020, Draft Local Plan (Regulation 18) in August 2022 and Pre-submission Local Plan in April 2023 with a submission in December 2023 (Regulation 22). Following which the entire calendar year has been identified for the examination period (Regulation 24) with an adoption in December 2024 (Regulation 26).
- 1.5 Our client controls Land off Lincoln Road, Market Deeping which falls just beyond South Kesteven District Council's administrative boundary. Although the site directly relates to the town of Market Deeping, it is within Peterborough City Council. The site extends 8.2 hectares. It immediately adjoins the River Welland on its northern boundary and provides some road frontage on to Lincoln Road and Sutton Lane on its south west and south eastern boundaries, respectively.

- 1.6 Richborough Estates have prepared a Development Framework which has been appended to this representation. The Plan shows that the site could accommodate 165 dwellings with access off Lincoln Road and Suttons Lane. The Public Right of Way which runs along the river will be retained and an additional primary pedestrian route will be provided through the centre of the site. The Green Infrastructure Gateway proposed through the centre of the site would also accommodate a community orchard, sustainable urban drainage features, locally equipped areas of play and a natural area of place.
- 1.7 The proceeding sections of this Statement address in turn each of the relevant questions in the South Kesteven District Council Local Plan Review Issues and Options Report (2020) and although at an early stage it assesses whether the Local Plan Review (2041) is being prepared in accordance with legal and procedural requirements.
- 1.8 As set out in paragraph 35 of the Revised Framework (2019), Local Plans are considered 'sound' if they are;
  - 'a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.'

## 2. RESPONSE TO CONSULTATION QUESTIONS

### Question 1a – The Vision

*Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details*

- 2.1 Given that the vision has been positively prepared and accords with sustainability principles, it is broadly agreed that it should remain the same for the Local Plan Review (2041) with updates to reflect the amended plan period, growth level and changes to allocation.

### Question 1b – The Vision

*Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?*

- 2.2 The current vision does sufficiently address climate change by directing development towards the most sustainable areas within the District. This includes the four market towns which are Grantham, Stamford, Bourne and The Deepings.
- 2.3 Evidently, the Covid-19 pandemic has resulted in significant economic implications for the District. The planning system has the potential to be a key driving force behind the economic recovery and it is therefore essential that South Kesteven District Council's vision, objectives and subsequent planning policies are aspirational to support growth across all sectors and importantly that they are deliverable.

### Question 2 – Objectives

*Do you agree that the Objectives should remain the same for the new plan? If not please provide details.*

- 2.4 It is agreed that the objectives should remain the same for the new Local Plan.

### Question 4 – Plan Period

*Do you agree with the proposed plan period up to 2041?*

- 2.5 The South Kesteven District Council Local Plan Review (2041) covers a period spanning 21 years from today. In accordance with the published Local Development Scheme, the Council are aiming to have the Plan adopted by December 2024. At which point, the Plan will cover a period of 17 years. As detailed in paragraph 22 of the Revised Framework (2019), strategic policies should look ahead over a minimum of a 15 year period from adoption.

2.6 Although the plan period complies with paragraph 22 of the Revised Framework (2019), it is important to reiterate that this is a minimum period. In order for the Council to achieve their growth aspirations, it would be prudent for the plan period to be extended. This would enable the Council to adopt a more proactive approach for planning for the long term needs of the District, in particular with regards to the delivery of housing as part of new settlements or significant extensions to existing settlements which is outlined in paragraph 72 of the revised Framework (2019) as being one of the best mechanisms to significantly boost the supply of homes. Notwithstanding this, the minimal approach to the Plan period provides little flexibility should there be any unexpected delays during the plan making process.

2.7 Thus, the Council should extend the plan period beyond 2041.

#### **Question 5a – Settlement Hierarchy**

*Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.*

2.8 Settlement hierarchy's are an excellent planning tool for ensuring that development is directed towards the most sustainable areas in accordance with local and national planning policies. It is agreed that the current settlement hierarchy is appropriate by directing growth to the four sustainable market towns and therefore it should be retained within the Local Plan Review (2041).

#### **Question 6 – Housing Need and Requirement**

*Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?*

2.9 The Council's current plan sets out a need of 650 dwelling per annum which is the result of an uplift from the original target of 625 new homes a year because of a poor build-out rate between 2011 and 2018. This is rather than adopting the Government's standard methodology which would have required 767 dwelling per annum and the Council states it can therefore spread the shortfall (thus far) over the entire plan (to 2036) as opposed to a 5 year period. 2

2.10 However, when looking at the justification for the new 754 dwelling per annum target the Council is proposing this is based upon the 2014 household projections and the latest affordability ratio (currently 2018) in accordance with national policy. As the Council proposes that 2018 be used as a baseline for the plan period as it aligns to the evidence being used, is recent and therefore relevant to this plan review. This will need to be reviewed when newer household projections and affordability ratios are published. 2

- 2.11 When looking forward to these future adjustments to the Standard Method, it is assumed these would result in further increases from the current level and therefore the Council should seek to increase the figure of 754 to a higher number, to take account of likely future increases in the local housing need.
- 2.12 This is because the affordability ratio in the area has increased from 6.89 in 2011 to 8.16 in 2019, which represents a 16% increase over 8 years, according to the most recent data on the median house prices ratios in South Kesteven. If this rate of increase were continue over the new proposed Local Plan period from 2018 to 2041, this could mean that the affordability ratio could reach 11.91 by 2041, if appropriate action is not taken to arrest this rate of increase.
- 2.13 If this trend were to continue, then further increases would need to be planned for to make sure that the figure finally adopted as the new Local Plan target does not become out of date during its production process. The Council should not wait for future adjustments to the standard method to be made part way through the local plan production process as this may cause delays to an already long process. They should seek to 'bake in' an element of expected future uplifts to the local housing need requirement to ensure that the local plan process can proceed smoothly.
- 2.14 This concern about the length of time it takes to prepare and adopt a Local Plan is well founded, as despite the Government's recent announcement to change the planning system so that Local Plans only take 30 months (2.5 years) to prepare, the current (recently adopted in 2020) plan for 2011-2036 took over five years to prepare.
- 2.15 In addition to the above, there is also concern about the past rates of delivery in the District. As the Council admits in its own Local Plan, the rates of delivery in the area between 2011 and 2018 are poor. Subsequently, the Council (according to the latest results) have been failing the Housing Delivery Test by only delivering 82% of the houses required (1,602 compared to 1,947). On that basis, the Council would need to add a 20% buffer to its housing needs when determining if it has a 5 year supply of housing land. This approach should be taken to its currently devised local housing need figure of 754 dpa, which would increase it to 905 dwelling per annum.

- 2.16 Although it may be argued that the local housing need figure takes account of past delivery and thus it 'wipes the slate clean' in terms of previous under-delivery, South Kesteven has for a long time not been meeting its needs, according to its own monitoring data. The latest 5 Year Housing Land Supply Position (2019) shows that on average between the 2011/12 and 2018/19 monitoring years, an average of 531 dwelling per annum were completed. This is against a target of 650 dwelling per annum showing that over the long term they have only been meeting 82% of their (current and lower) target. This suggests a longer term problem of delivery in the area, and thus they should proactively plan for a higher level of housing to enable rates of delivery to be boosted.
- 2.17 Looking specifically at affordable housing, the latest Strategic Housing Market Assessment for the area (2017) sets out a requirement for 238 dwelling per annum of affordable units. This was a decrease of 41 dwelling per annum from the previous assessment undertaken in 2015, and yet for some reason the Council's recently adopted plan refers to the 2014 SHMA which set a target of 343 dwellings. Regardless, the Local Plan sets a target of 30% of on-site units to be provided as affordable, a decrease from the 2010 Core Strategy of 35%. This reduction in target seems odd considering the worsening affordability situation in the District, as well as the Council's reference to an outdated Strategic Housing Market Assessment in its current plan (which highlights a higher need figure than their latest data).
- 2.18 We attempted to find information specifically relating to the delivery of affordable housing, however, there was very little information, with the Council's most up to date Annual Monitoring Report being from 2014. This showed that between 2011/12 and 2013/14 the number of affordable homes delivered was 264 (117, 56 and 91 in each year respectively) compared to a Core Strategy target of 236 dwellings. The delivery of affordable housing is similar to that of market housing, in that it has been disappointing. The lack of recent data, and the information we do have points to a need to uplift housing targets to enable further affordable units to be brought forward. On that basis a significant uplift to enable additional affordable housing should be applied to the housing target in the new Local Plan.
- 2.19 Overall, the Council should seek to go beyond the local housing need set out by national policy and be ambitious about making up for lost time due to its previous poor rates of delivery. On the basis of their past performance and their current status under the Housing Delivery Test, we would suggest an additional 20% uplift to the current target to help ensure there is sufficient growth planned for in future.

2.20 As set out in paragraph 24 of the Revised Framework (2019), local planning authorities are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. Notably, paragraph 26 states that *'effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.'* Thus, to be considered 'sound' South Kesteven District Council will need to cooperate with neighbouring authorities, including Peterborough City Council. Cooperation between the two Council's will need to relate to a number of issues, including housing need within both areas and cross boundary matters such as our clients site.

#### **Question 7b – Stamford, Bourne and The Deepings**

*Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth? If not, please provide details and any alternative proposals.*

- 2.21 As outlined above, it is agreed that the existing settlement hierarchy is an appropriate mechanism for directing development to the most sustainable locations.
- 2.22 The Deepings, which comprises of Market Deeping and Deeping St James/Frognaal, is clearly a very sustainable location for growth given its provision of retail, recreation opportunities, education establishments, health facilities and employment. Immediately opposite our client's site is a bus stop that connects Peterborough to Market Deeping and Bourne. At peak times this service runs three times per hour and take 22 minutes to reach the centre of Peterborough.
- 2.23 The Sustainability Appraisal (2020) prepared by AECOM to support the Local Plan Review (2041) assessed the sustainability implications of directing growth towards Stamford, Bourne and the Deepings. Continuing the current Local Plan's focus of growth on Stamford, Bourne and The Deepings or renewing and increasing the focus of growth on Stamford, Bourne and The Deepings scored higher on the majority of sustainability themes except biodiversity and geodiversity, landscape, historic environment and air, land, water and soil resources, Boyer's commentary on this assessment has been provided in the table below.

SA Theme	Boyer's Commentary
Biodiversity and geodiversity	<p>The assessment has outlined a number of biodiversity constraints within The Deepings and other market towns to ultimately conclude that reducing the focus of growth within the Market Towns will help limit potential effects from new development on features and areas of biodiversity interest and support the resilience of ecological networks. This may include potentially locating development in less sensitive areas of the District, relative to the Market Towns.</p> <p>However, this is highly dependent on which sites South Kesteven allocate for development. It is strongly contended, that there are opportunities in The Deepings to deliver development to meet the housing need whilst mitigating against any potential impacts and delivering biodiversity net gain. Indeed, the Development Framework prepared in respect of Land off Lincoln Road, Market Deeping incorporates high levels of Green Infrastructure which will undoubtedly provide mitigation measures and biodiversity net gain.</p>
Landscape	<p>As detailed in the assessment, The Deepings is located wholly within the Fens LCA and the results of the South Kesteven Landscape Character Assessment demonstrated that landscape sensitivity to new employment and residential proposals within the Fen Margin LCA and The Fens LCA ranges from low to medium. Thus, the assessment concludes '<i>opportunities could exist in certain locations around the edge of existing settlements for some areas of new development</i>', including our clients site at Land off Lincoln Road, Market Deeping.</p>
Historic environment	<p>The Deepings benefits from five scheduled monuments, two conservation areas and 103 listed buildings and on that basis the assessment has concluded that reducing growth in market town would conserve and protect heritage assets. However, it is strongly contended that development can come forward in The Deepings which would accords with the aspirations and policies contained within Chapter 16 of the Revised Framework (2019). The Development Framework prepared in respect of our client's site indicates the Listed Buildings within the immediate vicinity of the site and the proposed development has been sympathetically designed to minimise the impact on the assets.</p>

Air, land, water and soil resources	We concur with the view that the market towns have the broadest range of services and facilities in the District and an increased level of development in these location would limit the need to travel and support sustainable transport sourced. Notably, it states that The Deepings do no have significant air quality issues.
Climate Change	Whilst the assessment is inconclusive it does state that <i>'the Market Towns provide accessibility to a range of local services and facilities which reduces the reliance on private vehicles for undertaking some day-to-day activities. Therefore, continuing and increasing the focus of growth within the market towns through Option MT1 and MT2 will support a limitation of greenhouse gas emissions from transport through encouraging new development in locations with closer proximity to key amenities and public transport networks'</i> . With regards to flooding, whilst there are areas in the market towns and more specifically The Deepings which are at risk at flooding, Land Off Lincoln Road benefits from existing flood defences and is almost entirely within Flood Zone 1 and as shown on the Development Framework Plan development would be supported by a Sustainable Urban Drainage System.
Population and community	We concur with the assessment which reads as follows; <i>'Accessibility to social and community services and facilities is a key influence on community cohesion, settlement vitality and the quality of life of residents. In this respect, the three market towns have a range of services and facilities. A continued and enhanced focus of development within these settlements through Option MT1 and MT2 will therefore support accessibility to the wider choice of amenities present in these locations. In this respect, due to the requirements of developers to support infrastructure and services, for example through the Community Infrastructure Levy (CIL) and Section 106 agreements, payments may support the development of new and enhanced facilities.'</i>
Health and wellbeing	As set out in the assessment, directing growth in the Market Towns will support health and wellbeing because they have good access to primary health care services and sports and recreational facilities. Given the sustainability of the Market Towns, including The Deepings, it will encourage healthier modes of travel such as walking and cycling.
Transport	As highlighted throughout this representation, focusing development in the most sustainable locations will undoubtedly reduce the need to travel and this is also agreed in the sustainability appraisal.

Economic vitality	We agree with the assessment on economic viability which concludes that <i>'The provision of additional growth in Stamford, Bourne and The Deepings would place development in locations with good access to existing employment opportunities, including outside of the District in Peterborough. Additional development in these locations also has the potential to enhance the economic vitality of the towns and support employment and training opportunities.'</i>
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2.24 As outlined in paragraph 1.5, our clients site although in The Deepings falls within the administrative boundary of Peterborough. Peterborough City Council adopted the Peterborough Local Plan on 24th July 2019. The Plan allocated housing to deliver 18,840 dwellings between 2016 and 2036. The majority of housing (59%) was allocated immediately adjoining Peterborough to the north at Norwood, west at East of England Showground, south at Hampton and Great Haddon and east at Stanground South. The remainder was accommodated within the urban area of Peterborough (27%) and to the villages (5%) and on windfall sites (9%). As part of the Local Plan process, Peterborough reviewed a number of strategic land opportunities including further urban extensions, new settlements and larger village extensions. One of these opportunities was a large extent of land immediately opposite the site (as denoted in the orange line on Figure 1 below).



2.25 The Site has been assessed in the Developer Suggested Urban Extension and/or New Settlements – Evidence Site Profile for Land at Market Deeping Bridge (DEG004U) (Edition 2 July 2017). The assessment was primarily prepared by Oxalis Planning Ltd on behalf of Milton (Peterborough) Estates Company. Attached is Peterborough City Council’s assessment.

2.26 The assessment outlined that the site has the potential to deliver;

- 33.6 ha (approximate) net developable area (based on 60% of gross area) – approximately 875 homes assuming an average density of 35 per hectare on around 25 hectares;
- Approx. 3ha – 4ha employment (B1 uses);
- Primary School (up to 2 FE) on-site to meet on-site demand of around 250 primary children plus provision of an opportunity to deliver additional capacity to meet local needs currently met in Northborough;
- Contribution towards Secondary School Provision (approx. 170 secondary school aged children anticipated to be resident); Local Centre containing convenience retail and, subject to demand, space for community facilities (e.g. health) – part of a 4ha neighbourhood centre including the Primary School;
- Highways works to provide new vehicular access points with Lincoln Road, and potentially the A15; new cycle and pedestrian links;
- Extensive open space and green infrastructure provision on-site with connected network of green spaces running within and across the site, linked to existing routes and networks nearby.

2.27 The assessment makes reference to the fact that the site has a number of sustainability benefits which accords with the objectives set out in paragraph 8 of the Revised Framework (2019). However, as concluded in the aforementioned site assessment and concurred by Boyer Planning ‘the administrative boundary would have limited if any bearing on the day to day choices residents make regarding employment, retail, and travel.’

**Question 7e – Consideration of the Market and Deliverability**

2.28 Yes it is considered that market capacity is a factor which should be weighed into consideration when determining growth areas. Marketability is however difficult to measure and the main focus should relate to achieving sustainable development in accordance with the economic, social and environmental objectives outlines in paragraph 8 of the Revised Framework (2019).

2.29 Deliverability is an essential consideration for the plan-making process. This is emphasised throughout national planning policy and guidance and in particular paragraph 16 of the Revised Framework (2019) states that plans should ‘be prepared positively, in a way that is aspirational but deliverable’.

2.30 Furthermore, as detailed in paragraph 1.xx of this Representation for a Plan to be considered 'sound' it must be effective which includes ensuring it is deliverable over the plan period.

2.31 Our client's site is deliverable in the short term. There are two title ownerships that are controlled by Richborough Estates. The proposal is for a primary point of access from Lincoln Road with a secondary point of access to Suttons Lane. The site is of a scale that would be highly desirable to house builders and would not require significant infrastructure provision.

### 3. CONCLUSION

- 3.1 In conclusion, we agree with South Kesteven District Council's approach to direct development towards the four market towns in order to achieve local and national sustainability objectives.
- 3.2 The Council have identified that in their view the housing need is 754 dwellings per annum. This is however a minimum number to be planned for and delivered and in this case there is a need for the Council to opt for a higher housing need figure as a result of its previous poor rates of delivery and in order to provide an economic uplift. As a result of the detailed assessment provided in response to Question 6, Boyer concludes that an additional 20% uplift on the current target would ensure there is sufficient growth planned for the future. The housing need is therefore 905 dwellings per annum.
- 3.3 Our client controls Land off Lincoln Road, Market Deeping which has the potential to deliver 165 dwellings within the administrative boundary of Peterborough. Although the site falls outside of South Kesteven District Council the arbitrary administrative boundary would not have any impact on how future residents would live and relate to Market Deeping.
- 3.4 Directing development for Market Deeping to the south of the settlement is the most logical, accessible and sustainable strategy for the long term growth of the settlement. Land south of Market Deeping benefits from being the closest available land to the services and facilities within the town centre while benefiting from direct access to the highways network and a regular existing bus route along Lincoln Road.
- 3.5 Peterborough have already shown interest in distributing development to this location in their positive assessment of the large site to the west of Lincoln Road - Land at Market Deeping Bridge (DEG004U). It would therefore seem likely that they would assess a similar yet smaller proposal east of Lincoln Road in a similar positive manner. A large-scale extension to South of Market Deeping on both sides of Lincoln Road is therefore something that should be considered and one that will require some level of collaboration between the two neighbouring Authorities to minimise impacts and maximise the benefits of such a proposal.
- 3.6 In order to ensure the plan is positively prepared, justified, effective and consistent with national policy, the Council should give due consideration to this representation.



# **APPENDIX 1 – DEVELOPMENT FRAMEWORK PLAN**



**KEY PRINCIPLES**

1. PRIMARY ACCESS VIA LINCOLN ROAD AND SUTTON'S LANE;
2. PROPOSED PRIMARY INFRASTRUCTURE PROVIDING KEY MOVEMENT THROUGHOUT THE DEVELOPMENT;
3. SECONDARY MOVEMENT ROUTES SERVING SMALL CLUSTERS OF DEVELOPMENT;
4. INTERNAL FOCAL GREEN SPACES TAKING INFLUENCE FROM EXISTING URBAN FORMS IN MARKET DEEPIING HISTORIC CORE;
5. LOCALLY EQUIPPED AREA OF PLAY SERVING NEW AND EXISTING RESIDENTS;
6. NEWLY CREATED 'MAXEY GREENWAY' CREATING A GREEN LINK BETWEEN EXISTING MOVEMENT CORRIDORS AND PROPOSED RIVERSIDE WELLAND PARK;
7. NEWLY CREATED 'WELLAND PARK' PROVIDING ADDITIONAL LANDSCAPED WALKING ROUTES FOR NEW AND EXISTING RESIDENTS;
8. OPPORTUNITIES FOR COMMUNITY ORCHARD PLANTING PROMOTING INCLUSION AND SOCIABILITY FOR ALL RESIDENTS;
9. NEWLY CREATED RAMBLING ROUTES PROMOTING MAXIMUM PERMEABILITY FOR GREENER FORMS OF MOVEMENT;
10. OUTWARD FACING DEVELOPMENT PROVIDING PASSIVE SURVEILLANCE OVER NEWLY CREATED OPEN SPACE;
11. SITE LOW POINTS UTILISED FOR SUSTAINABLE URBAN DRAINAGE (TBC); AND
12. RETAINED VISUAL LINKS FROM THE LINCOLN AND SUTTON'S JUNCTION TO THE HISTORIC MAXEY HOUSE.

**KEY**

- SITE LOCATION (TBC)  
20.26 ACRES / 8.2 HECTARES
- RESIDENTIAL DEVELOPMENT  
- 4.81 HA / 11.88 ACRES @ 35 DPH =  
APPROX 165 DWELLINGS
- ACCESS VIA LINCOLN ROAD AND SUTTON'S LANE (TBC)
- PRIMARY MOVEMENT ROUTES
- SECONDARY MOVEMENT ROUTES
- PRIVATE LANES
- RETAINED PUBLIC RIGHTS OF WAY (CORRECT TO BING OS MAPPING - 21.08.20)
- PRIMARY PEDESTRIAN MOVEMENT ROUTES
- EXISTING VEGETATION (INDICATIVE)
- PROPOSED STRUCTURAL PLANTING
- PROPOSED ORNAMENTAL PLANTING
- COMMUNITY ORCHARD PLANTING
- PUBLIC OPEN SPACE APPROX 3.39 HA / 8.37 ACRES  
= 41.3% OPEN SPACE
- SUSTAINABLE URBAN DRAINAGE
- LOCALLY EQUIPPED AREAS OF PLAY
- AREAS OF NATURAL PLAY
- LISTED BUILDINGS

A	QUANTUM UPDATED	17.09.2020	RL	JW
Rev	Description	Date	Drawn	Chk'd

For Official Use Only:

REF: SK.IAO.0105

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details		2. Agents Details (if Applicable)
Title	Mr	Mrs	Mrs
First Name	Jeff	Judith	Tara
Last Name	Thompson	Beddows	Shippey
Organisation			Harcourt Land and Developments
Address			
Postcode			
Telephone			
Email Address			

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23/11/2020

**Part B: Issue and Options Consultation Questions**

**[Please see Vision Statement and responses to Issues and Options Consultation document that accompanies this submission section 7 for further details on responses to questions below.](#)**

## 5. Proposal 1 – 2036 Vision for South Kesteven

### Q1a – The Vision

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes	X	No		Unsure	
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If not please provide details.

In terms of Grantham the vision should also refer to the town capitalising on its existing employment development areas adjoining the A1, which have the potential for growth, particularly in the growing retail and logistics market place through growing demand on the strategic road network for B8 warehouse and distribution space.

Grantham's role as the Sub-Regional Centre should continue to be strengthened through significant housing and employment growth. Much of the success of employment growth around the town is due to its proximity to the A1, which provides a strategic corridor the full length of the country. Furthermore, the employment trend across the country has continued to shift towards the logistics/storage and distribution market, with this trend being exacerbated by the growth in online retail during the pandemic. In order to strengthen Grantham's role as Sub-Regional Centre, and to capitalise on the continuing trend, and indeed to support the economic recovery, the Council must explore employment opportunities near to Grantham and along the A1 corridor, such as land at Gonerby Moor.

### Q1b – The Vision

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

Yes		No		Unsure	X
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If not please provide details.

The Vision should be in line with Government objectives to deliver a Carbon neutral economy and developments in line with International Agreements.

## 6. Proposal 2 - Objectives

### Q2 – Objectives

Do you agree that the Objectives should remain the same for the new plan?

Yes	X	No		Unsure	
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If not please provide details.

The objectives contained within the current South Kesteven Local Plan (Adopted January 2020) should remain broadly appropriate for continuation within the Local Plan Review' is subject to any necessary amendments required once the proposed strategy, to address the specific issues to be considered within the Plan Review, has been finalised.

Objective 2 of the Plan seeks *“To develop a strong, successful and sustainable economy that provides a sufficient number and wide range of employment opportunities for local people”*. Quite rightly the plan looks to provide more, better quality jobs (i.e. opportunities in knowledge-rich business and higher skilled roles) and improving the skill levels of the working population within the District.

The provision of such opportunities at Gonerby Moor by expanding the Downtown Employment Area to include the sites proposed through these representations would assist with delivering the objectives for South Kesteven, especially in relation to developing the skill levels of the resident working population in the growing retail and logistics warehouse and distribution industry.

Objective 9 seeks to meet the identified development needs of the District whilst safeguarding the best and most versatile agricultural land. The proposed employment allocations at Gonerby Moor are entirely consistent with this objective. The sites proposed are Grade 3 agricultural land and it is considered that proposals fully accord with Objective 9 of the Local Plan Review.

Objective 12 of the Plan aspires *“to protect and promote the enhancement, sensitive use and management of the District’s natural, historic, cultural assets, green infrastructure and the built environment through good design...”*. The proposals would be designed to protect and enhance the biodiversity assets of the site in order to contribute to an overall biodiversity net gain. Similarly, the site’s landscape character has been assessed and the conclusions of this work has fed directly into the Master Plan. Key environmental and ecological objectives would be to provide landscape buffers and the enhancement of the landscape character to ensure that the scheme would assimilate with the local landscape alongside creating an innovative and attractive character that is distinct but complementary to the local setting.

Objective 14, which seeks *“to promote the prudent use of finite natural resources and the positive use of renewable resources”*. The proposals would develop a detailed energy strategy to inform master planning and building-integrated approaches to meeting the net zero carbon ready standards to be implemented. This would include high levels of building energy efficiency and performance, low carbon heating systems and integrated renewable energy sources such as Solar PV, which are increasing around Grantham. Opportunities to utilise these materials, as part of the construction of the proposals would be considered in order to assist in reducing carbon emissions and also in the creation of a distinctive local character for the settlement. The proposals put forward for would fully accord with the Council’s Local Plan objectives

## **7. Proposal 3 – Policies not proposed to be changed significantly**

### **Q3 – Policies not proposed to be changed significantly**

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not please provide details.**

The list of Local Plan policies identified in Proposal 3 of the Issues & Options consultation document are unlikely to require significant alteration as part of the Local Plan Review. Some policies listed may require minor amendments. This would ensure that such policies would be updated so as to remain consistent with the spatial strategy for development to be progressed through the Local Plan Review, and in responding to any updated evidence prepared in due course to support the Plan Review.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

**Do you agree with the proposed plan period up to 2041?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not please provide details**

Subject to the finding of the New Employment Land Study, that will inform the emerging Local Plan of future employment needs of the district.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

**Do you think the Settlement Hierarchy should be retained in the new Local Plan?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No		Unsure	
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No		Unsure	
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

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**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No		Unsure	X
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If not, please provide details and any alternative proposals.

--

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No		Unsure	
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If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No		Unsure	
-----	--	----	--	--------	--

If yes, please provide details.

### 13. Proposal 9 – Revisions to the Employment Policy

#### Q9a – Strategic Employment Allocations

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

The updated Employment Land Study must consider whether the overall employment strategy remains appropriate and deliverable, including detailed analysis of the appropriateness and deliverability of the current Strategic Employment Allocations. The on-going COVID-19 pandemic has changed the employment land and retail markets substantially. This factor alone makes it vital that a review of the Employment Land Study appropriately assesses the current demand (quantitatively and qualitatively) for employment land, and the likely future pattern of demand in a post-COVID-19 market.

By way of example COVID-19 has accelerated home-working and has driven an unprecedented increase in the use of e-commerce, which is reliant on warehouse and distribution. The District Council will no-doubt in considering this issue pay special regard to the comments raised by Inspector Clews in the recent Local Plan Examination regarding deliverability of the strategy, would be equally applicable in considering the employment land strategy.

Inspector Spencer also concluded that Strategic Employment Allocation in Policy E1 and Policy E2 were sound for delivering the identified employment strategy. As these allocations are predominately comprised of sites benefiting from planning permission, including the Designer Outlet Centre at Downtown at Gonerby Moor, there is no justification to de-allocate these sites.

Furthermore, given the market changes to the demand for employment land within the District (and beyond), additional high-quality employment locations for warehouse and distribution warehousing close to the A1 should be identified within the updated evidence or result from the extension to the Plan Period. Inspector Spencer concluded the Employment Land Study (2015) was overly cautious in terms of the opportunity available to South Kesteven to capitalise on its access to the A1 and the increasing demand for logistics and warehousing facilities. In the light of those recent conclusions and the growing changes to the retail and logistics markets, precipitated by COVID-19 pandemic we consider that a review of the Employment Land Study will identify an increase demand for logistics and warehousing within South Kesteven; the sites identified at Gonerby Moor through these representations are well placed, adjoining and with easy access to the A1 to meet these future demand and deliver modern, sustainable, energy efficient and high quality logistics and distribution warehousing fit for the 21<sup>st</sup> century market place.

#### Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details.**

Particular emphasis needs to be put on availability for the retail and logistics markets.

The employment policies of the emerging Local Plan should provide flexibility and innovation to employment land delivery, in a fast moving and evolving market particularly in relation to the retail and logistical warehouse distribution sector. Particularly in sustainable locations adjoining the strategic road network.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>X</b>
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**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

In light of the timescales for the preparation and adoption of the Local Plan Review, the policies of the Local Plan will require amendment in the light of the implications of the Environment Bill and the Government’s Future Homes Consultation.

In regard to the former the National Planning Policy Framework and the adopted South Kesteven Local Plan already include a requirement for development proposals to seek to secure biodiversity net gains. Notwithstanding that the Environment Bill once on the Statute Book will impose a statutory requirement to achieve a 10% net gain in biodiversity value. As such, it will be necessary for the Local Plan policies to be amended to reflect this statutory requirement

Accordingly, Policy EN2 (Protecting Biodiversity and Geodiversity) will need to be reviewed as it presently only requires the Council to seek to deliver a net gain on all proposals “where possible”. This approach will be inconsistent with the statutory requirement once in force.

The Government’s Future Homes Consultation proposes amendments to the Building Regulations which would require all homes built from 2025 to deliver 75-80% reductions in CO<sub>2</sub> emissions compared to homes built today.

The Planning for the Future White Paper indicates that all homes built under the Future Homes Standard would be “net zero carbon ready”, with the ability to become fully zero carbon homes

over time, as the electricity grid continues to decarbonise, and, therefore, reducing the need for retrofitting.

In the context of the above the current Local Plan policies does not include any reference to the need for homes delivered during the plan period to be 'zero carbon ready'. Accordingly, the plan policies will need amendment to introduce this requirement. This must also be consistent with Council's response to its declared Climate Change Emergency, in which they are seeking to be net zero carbon by 2050.

For non-residential development, it is anticipated that Government will introduce a similar requirement i.e. all non-residential properties to be developed as being net zero carbon ready, in due course. Therefore, it would be appropriate for the Local Plan Review to plan positively and prepare for the introduction of these standards now.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
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#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

--

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No		Unsure	
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Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes		No		Unsure	
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Please give details

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**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**



SOUTH KESTEVEN LOCAL PLAN  
REGULATION 18: ISSUES & OPTIONS CONSULTATION

# GONERBY MOOR GRANTHAM

VISION STATEMENT & CONSULTATION RESPONSES  
ON BEHALF OF MR J.THOMPSON & MRS J.BEDDOWS

23<sup>RD</sup> NOVEMBER 2020



DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE



# CONTENTS

## GONERBY MOOR GRANTHAM

VISION STATEMENT & CONSULTATION RESPONSES  
TO REGULATION 18: ISSUE & OPTIONS  
CONSULTATION

Contact: **Tara Shippey - Harcourt Land & Developments**



Prepared by Pegasus Group on behalf of **Harcourt Land & Developments**  
**23<sup>rd</sup> November 2020**  
Project code **P20-3148**



1	BACKGROUND	4
2	THE PROPOSALS	8
3	PLANNING POLICY CONTEXT	8
4	ACCESSIBILITY & SUSTAINABILITY	15
5	LANDSCAPE & ARBORICULTURE	16
6	FLOOD RISK, DRAINAGE & UTILITIES	19
7	EMERGING LOCAL PLAN ISSUES & OPTIONS	20

## 1. BACKGROUND

### 1.1 Context

1.1.1 These representations are made to the regulation 18 Consultation (Issues and Option) to the emerging South Kesteven Local Plan 2019 to 2041.

1.1.2 The representations firstly put forward for consideration land at Gonerby Moor, Grantham for B1 and B8 employment land as set out in this Vision Statement; in addition the representations address the relevant questions which are raised through the Issues and Options Consultation.

### 1.2 Introduction

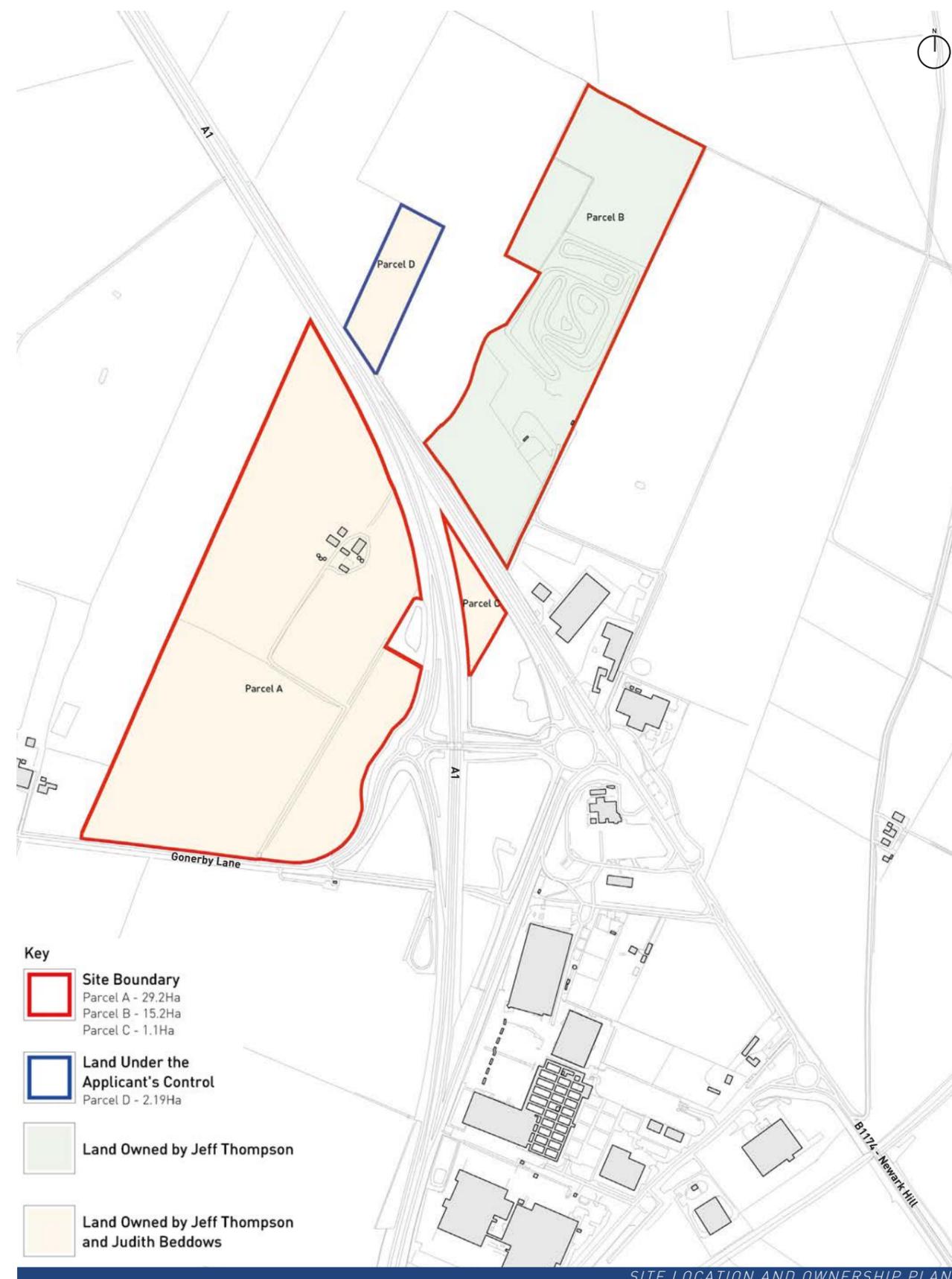
1.2.1 The employment site promoted for allocation in the emerging Local Plan review, through these representations, comprises three parcels of land, extending in total to circa 45.5 hectares (112.4 acres) in total ('the Sites'). The three parcels comprise:

1. Parcel A - circa 29.2 hectares (72.2 acres) of principally high-quality Class B8 development. This site is owned by Mr Jeff Thompson and Mrs Judith Beddows;
2. Parcel B - circa 15.2 hectares (37.6 acres) of principally high-quality Class B8 development. This site is owned by Mr Jeff Thompson only;
3. Parcel C - circa 1.1 hectares (2.7 acres) of principally high-quality Class E development. This site is owned by Mr Jeff Thompson and Mrs Judith Beddows;
4. Parcel D - land owned by Mr Jeff Thompson and Mrs Judith Beddows, but not formally promoted for employment within this issues and options response.

1.2.2 The sites are owned by Mr Jeff Thompson and Mrs Judith Beddows, who are part of the same family and are shown on the Site Location Plan. For planning policy purposes, the Sites are located in the open countryside.

1.2.3 The Sites are situated to the east and west of the A1, part of the strategic highway network in England linking London with the north east of England. The A1 also provides strategic road links to the east of England via the A15, A47 and A14/M11 and to the west of England via the A52, A47 and A14.

1.2.4 The area within which the Sites are situated is known as Gonerby Moor. The Sites are connected to the road network in the area by the relatively new grade-separated junction to the immediate north of the major established Downtown retail (46 hectares), manufacturing and employment area (which is subject to a resolution of the District Council's Planning Committee to grant planning permission (S17/2155), subject to completing a S106 Agreement, for the erection of a Designer Outlet comprising 20,479 sqm of Class A1 and A3 uses, which also includes a strategic trunk road service area operated by Moto. This area is the subject of Policy SAP5 of the District Council's Site Allocations and Policies Plan that identifies the retail and employment area as a 'locally important existing employment site'.



SITE LOCATION AND OWNERSHIP PLAN

1.2.5 The B1174 to the east of the A1 provides connection to Grantham, circa 3.3 miles to the south, whilst the B1174 also continues on the west side of this junction (Gonerby Lane). The B1174 is a bus route to/from Grantham.

1.2.6 Parcels A and B by virtue of their respective locations adjoining the A1 provide an accessible strategic location for B8 warehouse and distribution development, that would provide qualitative employment opportunities and offer choice in what is a growing logistics and retail market place. The Sites by virtue of their location in relation to Grantham also provides opportunities for an accessible workforce and consequently would create a range of new jobs and attract inward investment for the town, in what already an established employment location.

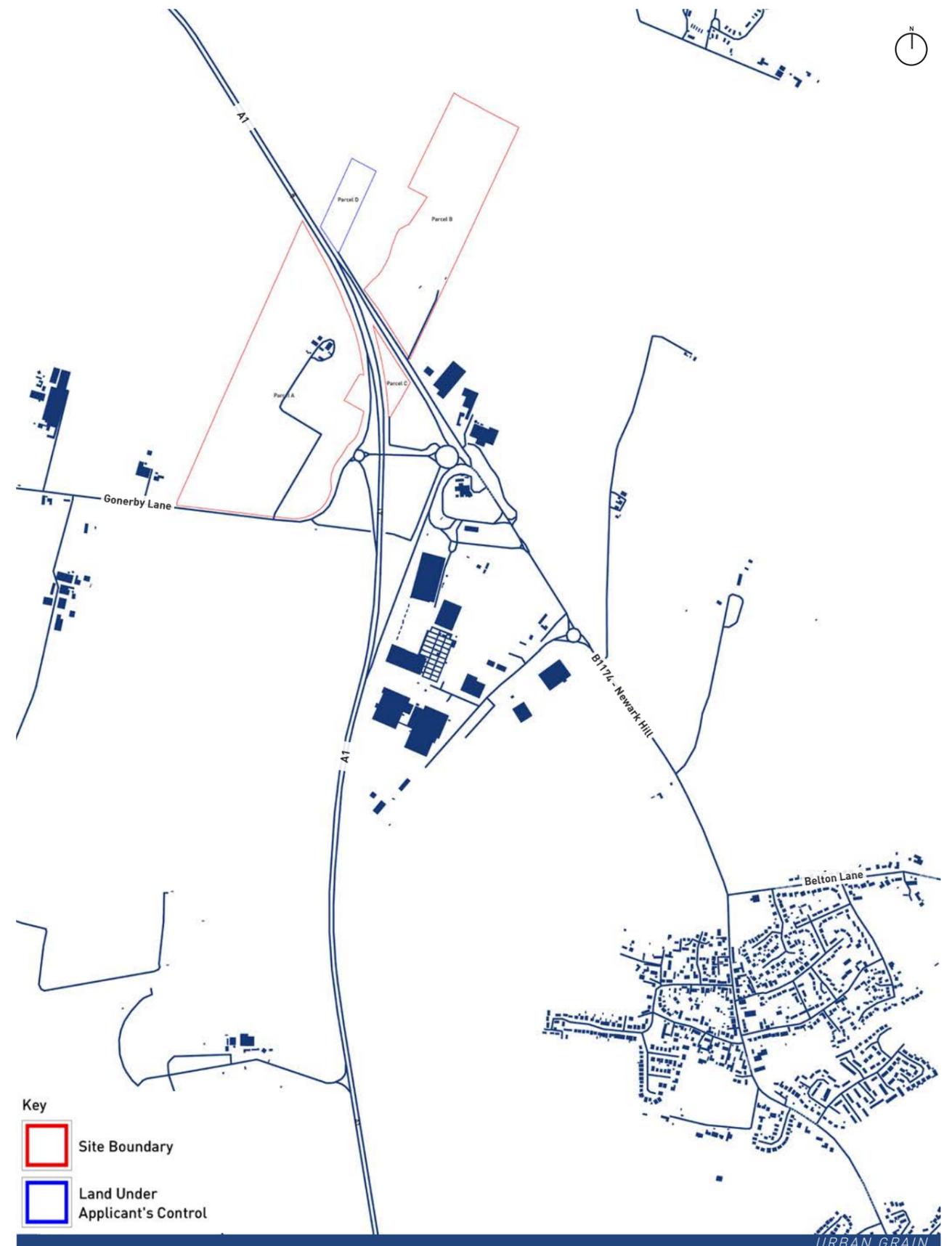
1.2.7 Parcel A is principally flat arable farmland, with a few trees and hedgerow boundaries (and ditches) and little by way of technical or development constraints for the proposed employment allocation. There are redundant farm buildings and farmhouse. To the west of Parcel A are other employment uses, including Area UK equestrian showground, recognised internationally, Allington Car Boot and Market Site, and a large solar farm to the south adjoining the A1. There are a small number of residential properties scattered within the area.

1.2.8 Parcel B is partly occupied by Ryan Wilson, who operates Moto 101, a Moto Cross facility. Again, there are few technical or development constraints to the development proposed for the proposed employment allocation.

1.2.9 Parcel C is an island site situated between. On the western side) the southbound carriageway of the A1 and (on its eastern site) the current A1 southbound off-slip road. It is a flat and featureless area of land that could accommodate an allocation for a Class E office or light industrial development.

1.2.10 As indicated above the Sites and not affected by any significant legal, development, technical or other constraints to preclude their allocation for employment development as sought. As such the Sites are demonstrably available, achievable and developable.

1.2.11 The landowners are advised by a highly respected team of consultants including Marrons Planning (Town Planning), Golby and Luck (Landscape), RPS (Highways, Transportation, Flood Risk, Drainage and Utilities), and Pegasus Group (Masterplanning).



## 2. THE PROPOSALS

### 2.1 The Proposed Employment Opportunity

2.1.1 In summary, the proposed employment opportunity presented by the Site comprises:

1. Employment – circa 135,000 sqm of high-quality employment development (Class E, B2 and B8);
2. S106/CIL contributions;
3. Access proposals to serve the developments together with any required off-site highway improvements necessitated by the development;
4. Landscape, biodiversity and Green Infrastructure enhancements and open space provision;
5. Sustainable transport provisions, emergency access provision including cycle and walking;
6. Sustainable drainage provision.

## 3. PLANNING POLICY CONTEXT

3.1.1 The South Kesteven Core Strategy (adopted July 2010) provides no special designation for the site. In planning policy terms, the land is open countryside.

3.1.2 The South Kesteven Local Plan (2011 - 2036) was recently adopted on the 30th January 2020. This followed an Inspector's Report on the 6th January that insisted on a policy commitment within the plan to an early review to address, amongst other things, an updated assessment of employment land requirements and changing circumstances around local housing need. Similar to the Core Strategy, the Local Plan indicates only that the site is open countryside.

3.1.3 The Local Plan's (2011 - 2036) spatial strategy is to focus growth towards the major town of Grantham and then to the other towns and some larger villages. The Inspector agreed that this spatial strategy was an entirely appropriate response to deliver a sustainable pattern of development in the context of the need to boost the local economy, deliver homes, support the sustainability of communities, maximise sustainable travel options and to conserve and enhance the natural and historic qualities of what is predominantly a rural district. At the point of submission, the plan distributed 50% of the housing growth and 75% of employment land growth towards Grantham. As a consequence of Main Modifications, Grantham's proportion of growth increased to 53% with the share of housing growth to Stamford and smaller villages falling.

3.1.4 The evidence base that underpins the Local Plan (2011 - 2036) includes the Employment Land Capacity Study 2010; the Employment Land Capacity Study 2015; and the Grantham Capacity and Limits to Growth Study (July 2015). These studies largely informed decisions around suitable employment and housing site selection for the Local Plan.

3.1.5 The Employment Land Capacity Study 2010 assesses four potential employment land sites in Grantham and Gonerby in an attempt to identify the most suitable sites to meet the forecast employment need. Land at Gonerby Moor ranked "high" and came top scoring 26/35 in the assessment. The study states that:

*'SK019 Gonerby Moor east (45.54ha): one of the best performing potential development sites assessed, the highly accessible nature of this area, allied with the absence of development constraints, could make this an attractive site to develop for B8 uses, whilst Gonerby Moor's successful cluster of industrial / businesses uses would reduce the element of risk attached to the site.'*

3.1.6 The Grantham Capacity and Limits to Growth Study 2015 (Section 3.12) assesses Gonerby Moor as a potential growth option – also referred to as Area 6. The site that is the subject of this Vision Document is located within the southern half of Area 6. The report found the following:-

- The site comprises average quality Grade 3 agricultural land throughout Area 6;
- The A1/ B1174 (which is a bus route) junction provides connections to Grantham, Allington and the primary road network. The combination of bus routes, footpaths and future cycleways and roads mean that the southern half of the area is considered highly suitable in terms of connectivity and promoting sustainable transport methods;
- Area 6 is a generally open and low lying agricultural landscape. The majority of Area 6 is considered to have a 'medium sensitivity' to employment development within the Landscape Character Assessment. The area west of the A1/ B1174 junction is in part influenced by the A1 and existing farm structures;
- Area 6 performs well in terms of impacts upon heritage assets;
- Development of new employment premises has the potential to reduce deprivation in more central parts of Grantham that are easily accessible from Area 6 along the B1174;

- Area 6 is already an employment-focussed location, with significant potential to build upon this existing strength. The centre of Area 6, focussed on the B1174/A1 junction, would be in demand for B8, which would be advantageous in transport and amenity terms. There is likely to be demand for large-footprint employment uses on both the western and eastern sides of the A1;
- Gonerby Moor benefits from few defensible boundaries. The most logical spatial pattern of development here would therefore be to stay close to the existing roads and the B1174 or the A1, thus reducing its spatial impact.

3.1.7 The report concluded that new development should be limited to an area within 1km of the A1/B1147 junction, and to the north of Gonerby Lane. It states:

*“For land within the 1km radius from the A1 junction and west of the A1, there is some potential for using the long, straight hedgerows east of Willowtrees House as a defensible boundary for development along the A1 and north of Gonerby Lane in this location. Subject to mitigation including an appropriate landscaping strategy and buildings not exceeding the height of the existing buildings at Downtown, this land is suitable as a contingency site for employment development. Note that Western Power Networks have stated that it would be expensive (but possible) to lay a cable under the A1 to connect any development here to the grid”.*

3.1.8 As noted above, the Inspector’s final report on the current Local Plan (2011 – 2036) commits the Council to undertake an early review of the Local Plan from April 2020 with submission by the end of December 2023. An Issues and Options consultation has commenced which sets out the key issues and options to be considered within the review. The Issues and Options document states that a number of policies in the adopted Local Plan require updating to ensure they are consistent with national policy or to enhance their effectiveness.

3.1.9 Paragraphs 4.31 and 4.32 of the Issues and Options consultation document note that the allocation of employment land at Policies E1, E2 and E3 of the recently Local Plan (2011 – 2036) were based on evidence from an Employment Land Study undertaken in 2015, which the Council recognise is now dated and does not take account of changing economic circumstances since then, as well as the likely economic impact following the COVID19 crisis. Within the Issues and Options consultation document, the Council proposes that allocated strategic employment sites set out in Policies E1 and E2 will remain allocated throughout the review, unless there is strong and robust evidence that they are no longer suitable or deliverable. The Council also proposed to undertake an update of the Employment Land Study, which will then be used as evidence in the review of the Local Plan, specifically to consider the need for sites set out in Policy E3 together with their suitability and deliverability.

3.1.10 Our client agrees that, in light of the out-datedness of the evidence base upon which the decision to allocate employment land under Policies E1, E2 and E3 of the Local Plan (2011 – 2036) was made, it is entirely appropriate to update the Employment Land Study with a view to assessing the suitability and deliverability of the current employment allocations and potentially allocating replacement or additional sites that are more suitable, respond better to the changing economic demands of the market and are thus more likely to be deliverable within the short-term (which is where the demand exists). For the reasons set out above, and based on the findings of the Grantham Capacity and Limits to Growth Study (2015), it is clear that land at Gonerby Moor represents a highly logical, suitable and deliverable employment site prospect for South Kesteven.



AERIAL DRONE IMAGE WITH INDICATIVE SITE BOUNDARY SHOWN



AERIAL DRONE IMAGE WITH INDICATIVE SITE BOUNDARY SHOWN



AERIAL DRONE IMAGE WITH INDICATIVE SITE BOUNDARY SHOWN



AERIAL DRONE IMAGE WITH INDICATIVE SITE BOUNDARY SHOWN



#### 4. ACCESSIBILITY & SUSTAINABILITY

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <p>4.1.1 RPS have undertaken an Initial Transport Assessment of the proposals for the development of employment land at Gonerby Moor.</p> <p>4.1.2 In the context of the larger site to the west of the A1, it is considered that suitable access can be provided to the development of the land via an improvement of the existing roundabout junction serving the A1 northbound slip roads and Gonerby Lane. The upgrading of this junction through an increase in the size of the roundabout will offer the opportunity to create an additional leg to the junction forming a dedicated access to the development with direct connections to the A1.</p> <p>4.1.3 Whilst not necessary to serve the site, a secondary access could be formed to the site from Gonerby Lane over the frontage access.</p> <p>4.1.4 Turning to the land to the east of the A1, the proposals for this development area are to introduce a new roundabout junction on the existing slip road with access taken from the junctions to the proposed employment areas either side of the existing slip road. This would then open up these areas of land for development which are otherwise constrained by lack of access. The section of the existing slip road to the south of the sites and new junction would then be converted to a two way road allowing access to and from the existing junction to the south.</p> | <p>4.1.5 As part of these proposals, the new junction could also improve access to the existing commercial operations to the east of the slip road.</p> <p>4.1.6 Such access arrangements to and from both sites would allow direct connections to the A1 both north and south bound for HGV traffic associated with the distribution of goods etc. As part of any application a full Transport Assessment would be provided and assess the local transport network, although it is considered that the scale of the development would not cause a severe impact in either of the network peak hours, given the type of the uses proposed.</p> <p>4.1.7 To enhance access to the site for employees, it is proposed that the existing pedestrian and cycle links are extended into the sites to allow connections by sustainable travel to the areas to the east of the A1 and south of the existing junction. This includes the existing commercial and retail areas and the existing bus services within the local area which serve these existing uses.</p> |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

5. LANDSCAPE & ARBORICULTURE

5.1.1 This is located within the Trent and Belvoir Vale landscape character area with the published landscape character assessment setting out the following summary:

*“Landscape sensitivity to new employment and residential proposals is likely to be. Whilst the landscape itself contains relatively few sensitive features, there is little structure to help assimilate new development. Woodlands and trees in the landscape are typically associated with the settlement, so new development assimilated within existing settlement edges, could be mitigated by appropriate landscape proposals in keeping with the established character.”*

5.1.2 The land is generally open and low lying with urban influences from the adjoining A1 and Downtown employment area to the immediate south. The Grantham Capacity and Limits to Growth Study undertaken by AECOM in July 2015 concluded (page 127) that this area:

*“...is considered to have medium sensitivity to employment... development within the Landscape Character Assessment. The area to the south east of the A1 services is considered to have low to medium sensitivity. The area east of the B1174 lies in close proximity to an existing commercial unit generally enclosed by substantial field boundaries and tree planting. The area west of the A1/B1174 junction is in part influenced by the A1 and existing farm structure.”*

5.1.3 The Aecom analysis also concluded that:

*“Notwithstanding these constraints, there is some potential for employment development....as long as it relates well to and stays close to the A1/B1174 junction. The open character of Gonerby Moor west and north of the A1 makes this land generally less suitable than land to the east in terms of landscape impact and spatial opportunities/constraints.*

*For these reasons...outside a 1km radius from the B1174 bridge over the A1 is considered not suitable for development...”*

5.1.4 The proposal will clearly relate to the existing Gonerby Moor Employment Area, which is recognised as a locally important existing employment site, and is within 1km from the B1174 bridge over the A1. The AECOM Study recognised that the hedgerows in this immediate area to the west and east of the A1 presented defensible boundaries for development, as shown in Figure 52 to the AECOM Study.

5.1.5 The AECOM Study does examine the potential for mitigation within this 1km area from the B1174 bridge over the A1 and concludes (p128)

*“Subject to mitigation including an appropriate landscape strategy and buildings not exceeding the height of existing buildings at Downtown, this land is suitable as a contingency site for employment development”*

5.1.6 The sites comprise land with an agricultural classification Grade 3 and is not considered to be ‘best and most versatile agricultural land. This is consistent with the findings of the AECOM Study shown in Figure 4.

5.1.7 Key sensitivities which will require to be addressed through on-going landscape impact assessment work includes being the degree to which the proposal may impact on views from Newark Hill to the east and whether or not the proposal will affect the setting of Belvoir Castle to the south-west.

5.1.8 Belvoir Castle is 5 miles away but when you consider and by its elevated position on the elevated Belvoir ridge enjoys panoramic views over a significant distance to the north and east. These views extend to Ratcliffe Power Station, most of Nottingham City Centre and the power stations at Goole including Drax and Ferrybridge on a clear day. It notes that the area to the west of the A1 is closer to Belton (5.4km) than Belvoir Caste (9kms away).

5.1.9 It comprised Element 5 of the Setting Study, in which it is considered “not sensitive provided that development rises no higher than the ridge or tree line”.

5.1.10 The AECOM Study went on to conclude:

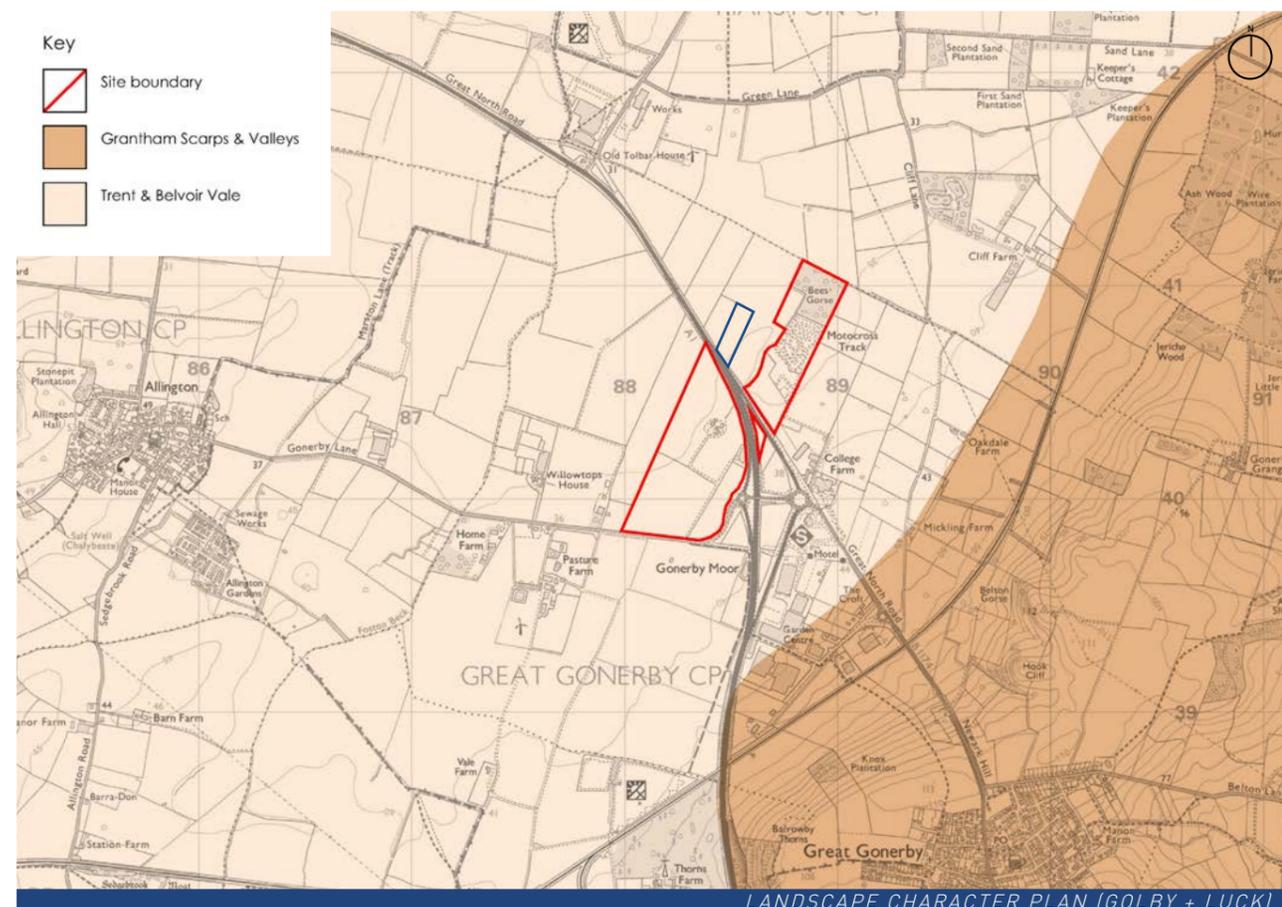
*“Based on the land’s performance in any assessment based on the principles of the Belton House and Park setting study...it is considered to be suitable for development on the heritage criterion subject to height restriction. The existing retail units at Downtown, though large, are in fact relatively low lying and it would be appropriate to mitigate the heritage impact of any development on land west of the A1 at Gonerby Moor by limiting it to the height of existing lower lying units east of the A1”.*



5.1.11 This consideration will require further consideration, which would be addressed in due course to support this representation.

5.1.12 Arising from the above in addition to heights of buildings, further key considerations in terms of mitigating impacts from buildings should focus on material and building colour. Such factors as these will be key to enabling the development proposed to be successfully assimilated into the sites landscape context adjoining the A1 and the existing Downtown employment development hub at this location.

5.1.13 In line with the conclusions of the AECOM Study, it is considered that the sites put forward represent a realistic opportunity for high quality employment development to the west and east of the A1/B1174 junction at Gonerby Moor. Indeed, the parcels A and C proposed in these representations, to the Issues and Options Consultation, was a recommended by the AECOM Study as suitable locations for growth for employment use in the longer term, particularly for B8 uses, due to surrounding land uses and access to the strategic road network (AECOM Study page 134 and Figure 54). There is likely to be demand for large-footprint employment uses on both the western and eastern sides of the A1 in this location.



## 6. FLOOD RISK, DRAINAGE & UTILITIES

### 6.1 Flood Risk & Drainage

- 6.1.1 When considering flood risk and drainage, this initial review has considered both sites in this regard. From this it has been established that both sites are within Flood Zone 1 and hence within the sequentially most preferable zone for proposed developments.
- 6.1.2 As part of any proposals for the sites full surface water drainage assessments will be undertaken. The approach will be to ensure on site attenuation ponds are provided and that the residual surface water run off will be at the green field run off rate. Measures will be provided within the scheme to incorporate sustainable urban drainage scheme techniques (SuDS) to accommodate surface water discharge including the appropriate allowance for climate change.

### 6.2 Utilities

- 6.2.1 As part of any proposals for the site details of the existing utilities supplies within the local area will be assessed. This will include a review of the electricity, gas, water and telecommunications apparatus that are located in proximity of each site.
- 6.2.2 In the context of foul water discharge it is understood there is capacity within the existing system to accommodate new development and this will be reviewed as part of any detailed proposals for the site.

## 7. EMERGING LOCAL PLAN ISSUES & OPTIONS

### **QUESTION 1a – The Vision**

*Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.*

### **QUESTION 1b – The Vision**

*Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District? If not please provide details.*

7.1.1 It is agreed that Grantham’s role as the Sub-Regional Centre should continue to be strengthened through significant housing and employment growth. Much of the success of employment growth around the town is due to its proximity to the A1, which provides a strategic corridor the full length of the country. Furthermore, the employment trend across the country has continued to shift towards the logistics/storage and distribution market, with this trend being exacerbated by the growth in online retail during the pandemic. In order to strengthen Grantham’s role as Sub-Regional Centre, and to capitalise on the continuing trend, and indeed to support the economic recovery, the Council must explore employment opportunities near to Gratham and along the A1 corridor, such as land at Gonerby Moor.

### **QUESTION 9a – Strategic Employment Allocations**

*Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable? If not, please provide details.*

7.1.2 The Inspector’s final report on the current Local Plan (2011 - 2036) commits the Council to undertake an early review of the Local Plan from April 2020 with submission by the end of December 2023. The Issues and Options document states that a number of policies in the adopted Local Plan require updating to ensure they are consistent with national policy or to enhance their effectiveness.

7.1.3 Paragraphs 4.31 and 4.32 of the Issues and Options consultation document note that the allocation of employment land at Policies E1, E2 and E3 of the recently Local Plan (2011 – 2036) were based on evidence from an Employment Land Study undertaken in 2015, which the Council recognise is now dated and does not take account of changing economic circumstances since then, as well as the likely economic impact following the COVID19 crisis. Within the Issues and Options consultation document, the Council proposes that allocated strategic employment sites set out in Policies E1 and E2 will remain allocated throughout the review, unless there is strong and robust evidence that they are no longer suitable or deliverable. The Council also proposed to undertake an update of the Employment Land Study, which will then be used as evidence in the review of the Local Plan, specifically to consider the need for sites set out in Policy E3 together with their suitability and deliverability.

7.1.4 Our client agrees that, in light of the out-datedness of the evidence base upon which the decision to allocate employment land under Policies E1, E2 and E3 of the Local Plan (2011 – 2036) was made, it is entirely appropriate to update the Employment Land Study with a view to assessing the suitability and deliverability of the current employment allocations and potentially allocating replacement or additional sites that are more suitable, respond better to the changing economic demands of the market and are thus more likely to be deliverable within the short-term (which is where the demand exists). For the reasons set out above, and based on the findings of the Grantham Capacity and Limits to Growth Study (2015), it is clear that land at Gonerby Moor represents a highly logical, suitable and deliverable employment site prospect for South Kesteven.



DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE





**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details		2. Agents Details (if Applicable)
<b>Title</b>	<b>Mr</b>	<b>Mrs</b>	<b>Mrs</b>
<b>First Name</b>	<b>Jeff</b>	<b>Judith</b>	<b>Tara</b>
<b>Last Name</b>	<b>Thompson</b>	<b>Beddows</b>	<b>Shippey</b>
<b>Organisation</b>			<b>Harcourt Land and Developments</b>

<b>Address</b>	██████████ ██████████ ██████████	██████████ ██████████ ██████████	██████████ ██████████ ██████████
<b>Postcode</b>	██████████	██████████	██████████
<b>Telephone</b>	██████████	██████████	██████████
<b>Email Address</b>	██████████ ██████████	██████████ ██████████	██████████ ██████████

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

<b>Signature (please type for an electronic response)</b>	<b>Date</b>
██████████	23/11/2020

**Part B: Issue and Options Consultation Questions**

**Please see [Vision Statement and responses to Issues and Options consultation document that accompanies this submission section 7 for further details on responses to questions below.](#)**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>				
<b>Q1a – The Vision</b>				
<b>Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?</b>				
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>
<b>If not please provide details.</b>				
Subject to the current policies being updated in light of emerging government policy. Particularly in relation to housing growth, which is considered in the answers below.				

### Q1b – The Vision

**Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>X</b>
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**If not please provide details.**

The Vision should be in line with Government objectives to deliver a Carbon neutral economy and developments in line with International Agreements.

### 6. Proposal 2 - Objectives

#### Q2 – Objectives

**Do you agree that the Objectives should remain the same for the new plan?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not please provide details.**

Grantham should maintain its role as a key location for new development. There should be restraint around the Deepings, Bourne and Stamford. In this context the larger villages will have an important role to play in assisting to meet housing requirements of the district. Great Gonerby is one of the larger villages closely adjoining Grantham and is sustainably located and with a good level of services and facilities to assist in meeting those housing needs of the district.

The relationship between Grantham and the strategic road corridor - A1, should not be underestimated in seeking to promote new economic development, inward investment and new jobs in and around Grantham.

The objectives contained within the current South Kesteven Local Plan (Adopted January 2020) should remain broadly appropriate for continuation within the Local Plan Review' is subject to any necessary amendments required once the proposed strategy, to address the specific issues to be considered within the Plan Review, has been finalised.

An early review of the adopted Local Plan is required in order to consider the implications of the increased housing needs resulting from the use of the Standard Method, the need to allocate sufficient land to inter alia the requirement to update the Employment Land Study, and the Council's declaration of a climate emergency.

### 7. Proposal 3 – Policies not proposed to be changed significantly

#### Q3 – Policies not proposed to be changed significantly

**Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
<b>If not please provide details.</b>					
<p>The list of Local Plan policies identified in Proposal 3 of the Issues &amp; Options consultation document are unlikely to require significant alteration as part of the Local Plan Review. Some policies listed may require minor amendments. This would ensure that such policies would be updated so as to remain consistent with the spatial strategy for development to be progressed through the Local Plan Review, and in responding to any updated evidence prepared in due course to support the Plan Review.</p>					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
<b>Do you agree with the proposed plan period up to 2041?</b>					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
<b>If not please provide details</b>					
<p>Subject to the current government consultation on the New Standard Method. If South Kesteven is required to provide a significant increase in housing provision its current housing requirement then consideration may need to be given to a longer plan period.</p>					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
<b>Do you think the Settlement Hierarchy should be retained in the new Local Plan?</b>					
<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
<b>If not, please provide details of what changes you think should be made.</b>					
<p>The National Planning Policy Framework through paragraph 11 is underpinned by a presumption in favour of sustainable development, whereby development should be directed to locations which are (or can be made) sustainable, where development would be supported by a range of local services and facilities. As such support in principle is given to the settlement hierarchy identified in the Local Plan. No amendments are sought to the position of the individual settlements identified within this hierarchy.</p> <p>In the light of the potentially significant uplift in the housing requirements for the District to be delivered over the plan period support is given to retaining the current spatial development strategy with particular reference to the important role larger villages can play as sustainable locations to delivering housing, both open market value and importantly affordable homes.</p> <p>Focus on provision of land for new housing development must focus around Grantham and the larger villages, with concern again being expressed about significant scale of new housing</p>					

development at Stamford, Bourne and The Deepings because of heritage and location/lack of facilities being significant constraints to continuing foci for growth in these towns.

**Q5b – Settlement Hierarchy Methodology**

**Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details of what changes you think should be made.**

**Q5c – New Settlement**

**Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If so, please outline any suitable and deliverable proposals.**

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

**Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, what evidence do you have to justify an alternative need and requirement?**

See also Vision Statement Submission - Paragraph 7.

We support in line with Paragraph 60 of the Framework the use of the Standard Method used in the Local Plan Review. There is significant uncertainty at present in understanding what is an appropriate local housing need given the current debate regarding the Standard Method for calculating local housing needs.

The Issues & Options Consultation document identifies a Local Housing Need of 754 dwellings per annum using the 2014-based household projections and 2018-based affordability ratios. It is noted that since the preparation of the consultation document, the Office for National Statistics (ONS)

released the 2019-based affordability ratios. Using this dataset results in an identified housing need for the District of 732 dwellings per annum. This results in a 16% uplift in the housing needs beyond the 650 dwellings per annum requirement identified within the adopted Local Plan (January 2020).

The Government is clear that the current standard method is not appropriate for achieving the Government’s policy of delivery 300,000 dwellings per annum nationally. This ‘policy’ is set out within the Planning for the Future White Paper, and also short-term measures set out within the “Changes to the Current Planning System” paper, which inter alai seeks to amend the standard method for calculating Local Housing Need. If the currently proposed revised Standard Method is adopted the result would be a significant increase in the District’s Local Housing Need well above the currently identified Local Housing Need and adopted Local Plan requirements. It would uplift the 732 dwellings per annum to 838 dwellings per annum.

Any changes arising from whatever figure the new Standard method finally arrives is likely to take place during the preparation of the ongoing Local Plan Review. This does mean the District Council should plan positively to meet whatever uplift in Local Housing Need is finally settled rather than proceeding on the basis of the potentially time-limited, lower housing need currently identified.

Irrespective of whatever final changes are made to the Standard Method, the PPG makes clear that the Local Housing Need figure calculated using the Standard Method should be viewed as a starting point and a minimum figure. Paragraph 010 of the PPG (Ref: 2A-010-20190220) provides there may be circumstances where it is appropriate to consider whether the housing need is higher than the standard method indicates. This should be a factor in the light of the above that the District Council consider and address now to deliver both market and affordable housing; in respect of the latter there is an acknowledged acute shortage (see Local Plan Inspector’s Report to adopted Local Plan January 2020).

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

**Do you agree that Grantham should remain as the focus for growth in South Kesteven?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

South Kesteven District Council will need to develop an appropriate spatial strategy and identify where the higher quantum of housing growth will be distributed as part of the Local Plan review. Paragraph 3.1.4 of the supporting Vision Statement to these representations notes that there seems to be no evidence to suggest that the distribution strategy of the new Local Plan should be changed significantly from the adopted Local Plan.

However, it is noted that the evidence base that informed the spatial strategy for the Local Plan (namely the Settlement Hierarchy Review and the Settlement Hierarchy Update paper) simply score and rate settlements on the services and facilities accommodated within them. The

evidence base around settlement hierarchy fails to take into account the relationships between larger villages such as Great Gonerby and the major town of Grantham.

The village of Great Gonerby is situated less than 1 mile north from Grantham with excellent connectivity along Grantham Road/Gonerby Road, yet this is not reflected within the Plan's settlement hierarchy or Great Gonerby's apportionment of growth within the Plan's distribution of development strategy. Our client's land at Great Gonerby presents an opportunity to accommodate large-scale residential development that benefits from close proximity to all the services and facilities of the major town of Grantham, yet does not compromise the integrity of Great Gonerby as a Large Village by resulting in coalescence with Grantham.

The site's close proximity to Grantham means that it was captured within a Potential Direction of Growth area A within the Grantham Capacity and Limits to Growth Study (July 2015). However, the assessment work then broke down the broad Directions for Growth into specific locations 1 – 6, which omitted our client's site. It is argued that in reviewing of the evidence base needed to update the Local Plan and ensure it meets the increased housing need, Area 1 (North of Manthorpe and Gonerby Hill Foot) should be broadened so that land to the north of Belton Lane is incorporated into the study area. This land provides an extensive area of land that would be capable of meeting the increased growth needs of Grantham as the town continues to grow and fulfil its role as a Sub-Regional Centre.

#### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes		No	X	Unsure	
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If not, please provide details and any alternative proposals.

Grantham should maintain its role as a key location for new development. There should be restraint around The Deepings, Bourne and Stamford.

Refer also to response to Question 5a.

#### Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	X	No		Unsure	
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If not, please provide details and any alternative proposals.

Please see response above to Question 7a.

#### Q7d – Other Settlements

**Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**If not, please provide details and any alternative proposals.**

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**Q7e – Consideration of the Market and Deliverability\***

**Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?**

<b>Yes</b>	<b>X</b>	<b>No</b>		<b>Unsure</b>	
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**Please provide details**

<p>The focus of the local plan should be about delivery of new homes in sustainable locations where there is an identified market for sales.</p>
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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If yes, please provide details.**

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

**Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?**

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
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**If not, please provide details.**

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

**Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?**

**Yes**

**No**

**Unsure**

**If not, please provide details.**

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

**Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?**

**Yes**

**No**

**Unsure**

**X**

**If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

In light of the timescales for the preparation and adoption of the Local Plan Review, the policies of the Local Plan will require amendment in the light of the implications of the Environment Bill and the Government’s Future Homes Consultation.

In regard to the former the National Planning Policy Framework and the adopted South Kesteven Local Plan already include a requirement for development proposals to seek to secure biodiversity net gains. Notwithstanding that the Environment Bill once on the Statute Book will impose a statutory requirement to achieve a 10% net gain in biodiversity value. As such, it will be necessary for the Local Plan policies to be amended to reflect this statutory requirement

Accordingly, Policy EN2 (Protecting Biodiversity and Geodiversity) will need to be reviewed as it presently only requires the Council to seek to deliver a net gain on all proposals “where possible”. This approach will be inconsistent with the statutory requirement once in force.

The Government’s Future Homes Consultation proposes amendments to the Building Regulations which would require all homes built from 2025 to deliver 75-80% reductions in CO<sub>2</sub> emissions compared to homes built today.

The Planning for the Future White Paper indicates that all homes built under the Future Homes Standard would be “net zero carbon ready”, with the ability to become fully zero carbon homes over time, as the electricity grid continues to decarbonise, and, therefore, reducing the need for retrofitting.

In the context of the above the current Local Plan policies does not include any reference to the need for homes delivered during the plan period to be 'zero carbon ready'. Accordingly, the plan policies will need amendment to introduce this requirement. This must also be consistent with Council's response to its declared Climate Change Emergency, in which they are seeking to be net zero carbon by 2050.

### 15. Proposal 11 – Energy Performance Standards

#### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes		No		Unsure	
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#### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes		No		Unsure	
-----	--	----	--	--------	--

Please give details.

#### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>Please give details</b>					

<b>17. Proposal 13 – Parking Standards</b>					
<b>Q13 – Parking Standards</b>					
<b>Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	
<b>Please give details</b>					

<b>18. Any other Comments</b>					
<b>Q14 – Any other Comments</b>					
<b>Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?</b>					

**Part C: Sustainability Appraisal Scoping Report**

<b>19. Comments about the Sustainability Appraisal Scoping Report</b>					

**Thank you for responding to this consultation.**



SOUTH KESTEVEN LOCAL PLAN  
REGULATION 18: ISSUES & OPTIONS CONSULTATION

# LAND NORTH OF BELTON LANE **GREAT GONERBY**

VISION STATEMENT & CONSULTATION RESPONSES  
ON BEHALF OF MR J.THOMPSON & MRS J.BEDDOWS

23<sup>RD</sup> NOVEMBER 2020



DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE



# CONTENTS

## LAND NORTH OF BELTON LANE GREAT GONERBY

VISION STATEMENT & CONSULTATION RESPONSES  
TO REGULATION 18: ISSUE & OPTIONS  
CONSULTATION

Contact: **Tara Shippey - Harcourt Land & Developments**



Prepared by Pegasus Group on behalf of **Harcourt Land & Developments**  
**23<sup>rd</sup> November 2020**  
Project code **P20-3147**



1	BACKGROUND	4
2	THE PROPOSALS	6
3	PLANNING POLICY CONTEXT	9
4	ACCESSIBILITY & SUSTAINABILITY	10
5	LANDSCAPE & ARBORICULTURE	11
6	FLOOD RISK, DRAINAGE & UTILITIES	13
7	EMERGING LOCAL PLAN ISSUES & OPTIONS	14

## 1. BACKGROUND

### 1.1 Context

1.1.1 These representations are made to the regulation 18 Consultation (Issues and Option) to the emerging South Kesteven Local Plan 2019 to 2041.

1.1.2 The representations firstly put forward for consideration land to the north of Belton Lane, Great Gonerby for residential (C3) development as set out in this Vision Document; in addition, the representations address the relevant questions which are raised through the Issues and Options Consultation.

### 1.2 Introduction

1.2.1 The residential land proposed for allocation in the emerging Local Plan review, through these representations, comprises agricultural land extending in total to circa 17 hectares (42 acres) in total ('the Site').

1.2.2 The site is owned within the same family, details are shown on the Site Location and Ownership Plan (Page 6). For planning policy purposes, the Site is located in the open countryside.

1.2.3 Great Gonerby is a medium sized village with a population of circa 2,200 people (2011 Census). The village is situated two miles north from the centre of Grantham. The village sits on top of a hill which rises to 113m(360ft) above sea level. The main road (B1174) runs through the village in a roughly north to south direction and was originally the Great North Road.

1.2.4 The village is well served by community and other facilities including the 14th century St. Sebastians Church, a Methodist Chapel, a village school, a playgroup, public house, a grocery store and a post office/shop. Other communal facilities include a Memorial Hall, a Social Club and a playing field with play area and floodlit Multi-Sport facility.

1.2.5 It is situated less than 1-mile (1.6 km) north from the centre Grantham. The growth of the village in the 1990s has meant that it is separated from the town by approximately 400 yards (366 m). It is well connected and sustainably located to Grantham and its services and facilities by public transport and cycle/pedestrian routes.

1.2.6 The site is currently undulating arable farmland with some trees and a hedgerow boundary. The Site forms part of a larger area of agricultural land to the north (which is not the subject of this proposal) and is effectively separated by a 132 KV OHC which crosses the site in a northwest- south-east direction.

1.2.7 These representations put forward a development area of circa 5 hectares of land that could accommodate up to 300 dwellings. Access to the Site would be taken from Belton Lane and would meet relevant highway authority requirements. A public right of way (Footpath GtGO 3/1) runs north-south through the site and this route would be preserved by the proposals for the Site. This is shown in Concept Masterplan - Revision B.

1.2.8 In terms of the Site, this is located at the northern edge of the Grantham Scarps and Valleys Landscape Character Area and is partially within the formerly designated Prominent Area of Special Protection. This designation covered the ridges either side of the plateau as they are both prominent in views to the east and west.

1.2.9 The land to the south of Belton Lane is a complex landscape, largely occupied by historic field patterns.

1.2.10 Applications have been made at the eastern edge of Great Gonerby within this former landscape designation and consented. Within the site the areas that relate most to this former designation are the sections of land at the edge of the ridge (the 105m contour) and the land to the east of this contour, more specifically the south-east. The key issues relate to the skyline landscape setting of the topographical bowl that surrounds Grantham and the setting of Belton House and its Registered Park and Garden.

1.2.11 The Site is not affected by any legal, technical, development or other constraint and as such, being in family ownership, is available, achievable and developable.

1.2.12 The landowners are advised by a highly respected team of consultants including Marrons Planning (Town Planning), Golby and Luck (Landscape), RPS (Highways, Transportation, Flood Risk, Drainage and Utilities), and Pegasus Group (Masterplanning).





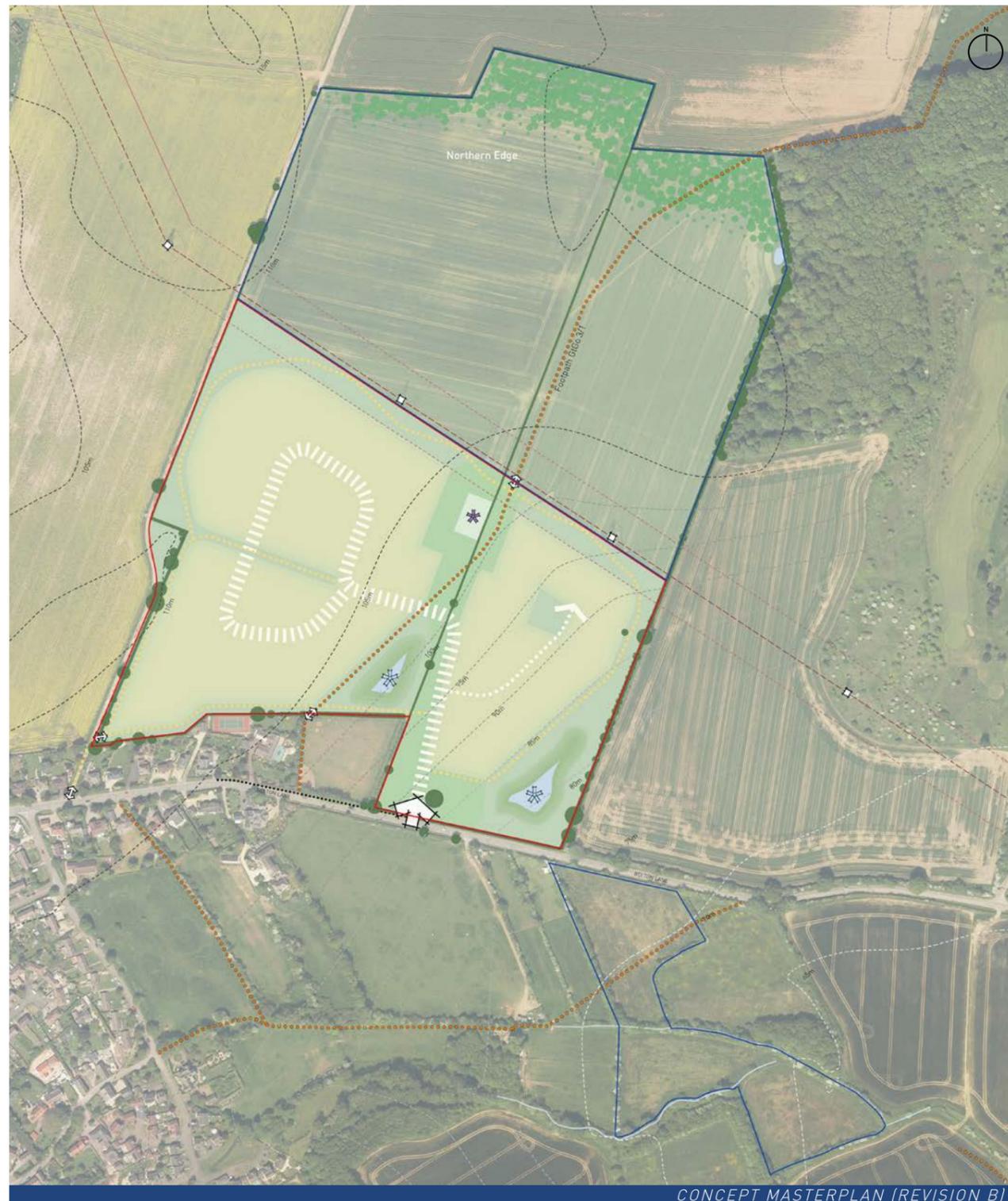
## 2. THE PROPOSALS

### 2.1 The Proposed Residential Opportunity

2.1.1 In summary, the proposed residential opportunity presented by the Site comprises:

1. Residential – up to 300 new homes providing a broad range of house types (including policy compliant affordable and custom-built homes);
2. S106/CIL contributions;
3. Access proposals to serve the developments together with any required off-site highway improvements necessitated by the development;
4. Landscape, structural woodland planting, biodiversity and Green Infrastructure enhancements and open space provision;
5. Sustainable transport provisions, emergency access provision including cycle and walking links;
6. Sustainable drainage provision.





### 3. PLANNING POLICY CONTEXT

3.1.1 The South Kesteven Core Strategy (adopted July 2010) provides no special designation for the site. In planning policy terms, the land is open countryside.

3.1.2 The South Kesteven Local Plan (2011 - 2036) was recently adopted on the 30th January 2020. This followed an Inspector's Report on the 6th January that insisted on a policy commitment within the plan to an early review to address, amongst other things, an updated assessment of employment land requirements and changing circumstances around local housing need. Similar to the Core Strategy, the Local Plan indicates only that the site is open countryside.

3.1.3 The Local Plan's (2011 - 2036) spatial strategy is to focus growth towards the major town of Grantham and then to the other towns and some larger villages. The Inspector agreed that this spatial strategy was an entirely appropriate response to deliver a sustainable pattern of development in the context of the need to boost the local economy, deliver homes, support the sustainability of communities, maximise sustainable travel options and to conserve and enhance the natural and historic qualities of what is predominantly a rural district. At the point of submission, the plan distributed 50% of the housing growth and 75% of employment land growth towards Grantham. As a consequence of Main Modifications, Grantham's proportion of growth increased to 53% with the share of housing growth to Stamford and smaller villages falling.

3.1.4 Great Gonerby is less than 1 mile away from Grantham and is identified within Policy SP2 of the Local Plan (2011 - 2036) as being a larger village and capable of accommodating new growth; indeed a housing allocation of circa 45 dwellings is identified within the village (land at Eastthorpe Road).

Notwithstanding its close proximity and functional relationship with Grantham, the village has a primary school, a playgroup, a convenience store and a post office/shop. Further facilities include a public house, a memorial hall, a social club and a playing field with play area and floodlit multi-sport facility; along with open spaces and equipped play areas.

3.1.5 In order to accommodate the significant increase in housing requirement within South Kesteven (a rise from 645 dwellings per annum to a minimum of 754 dwellings per annum, although there is more likely to be a need to accommodate circa 839 dwellings per annum), it will be necessary to proportionally increase the quantum of housing directed towards the Larger Villages such as Great Gonerby. However, in addition to this, and in order to continue to direct the majority of the district's growth towards Grantham and allow it to fulfil its role as a Sub-Regional Centre, it will be necessary to consider further opportunities to accommodate larger-scale housing around the town. Land North of Belton Lane presents an opportunity to accommodate large-scale residential development that benefits from close proximity to all the services and facilities of the major town of Grantham, yet does not compromise the integrity of Great Gonerby as a Large Village by resulting in coalescence with Grantham. As argued in Section 10 of this document, the role of Great Gonerby within the settlement hierarchy of the Plan should be reviewed to reflect its close proximity and functional relationship with Grantham, and its apportionment of growth increased accordingly.



#### 4. ACCESSIBILITY & SUSTAINABILITY

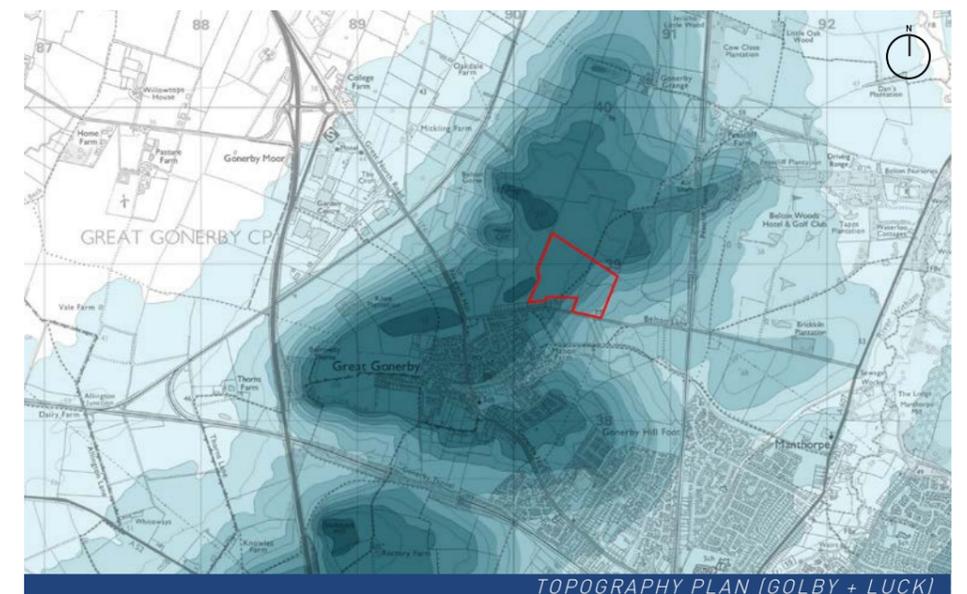
- 4.1.1 RPS have undertaken an Initial Transport Assessment of the proposals for the development of circa 300 dwellings on land to the north of Belton Lane, Great Gonerby.
- 4.1.2 The proposal is to access the site via a new priority junction over the frontage of the site. As part of this the existing 30mph speed limit would be relocated to the east of the new access.
- 4.1.3 The access can be delivered to the full standards required with the appropriate visibility splays. Between the site access and the existing residential dwellings within Great Gonerby a new footway would be provided to create the opportunity for residents to walk between the new development and the existing facilities. A second pedestrian access is to be provided to the west of the site linking to Belton Lane via an existing track. The third point of access would be the retention of the existing PROW which crosses the site and links to Belton Lane.

- 4.1.4 As part of any detail appraisal of the site a Transport Assessment would be prepared to assess the overall impact. However it is considered that the scale of the development would not result in a severe impact in either of the network peak hours. As part of any assessment the junction of Belton Lane and the B1174 would be assessed. If measures were required to mitigate the impact of the development this could include the provision of traffic signals at this junction or a mini roundabout.
- 4.1.5 In terms of accessibility, the site is within walking distance of the main facilities within Great Gonerby including the primary school, Post Office and local stores together with the existing bus stops. Accordingly access to Grantham is available by sustainable travel including links to the Rail Station within Grantham.

#### 5. LANDSCAPE & ARBORICULTURE

- 5.1.1 The residential promotion site is located at the northern edge of Great Gonerby at the edge of the Grantham Scarps and Valleys Landscape Character Area (LCA) on a plateau of land that extends between the valley setting of Grantham to the east and extensive low-lying valley setting of the Vale of Belvoir to the west.
- 5.1.2 The Grantham Scarps and valleys LCA is defined by Grantham that extends across the valley floor of the River Witham and the surrounding ridgelines that contained the setting of the settlement from the wider character areas of the Belvoir Vale to the north-west, the limestone ridge of the Lincolnshire Edge to the east and Fens beyond, and the upland farmlands to the south that extend across the landscapes central to South Kesteven.
- 5.1.3 Great Gonerby sits to the north-west of Grantham as an outlying settlement located on rising ground that includes the relatively wide plateaus above the 100m contour. The land to the south of Great Gonerby is constrained by a relatively narrow band of farmland that separates Gonerby Hill Foot to the south-east that comprises the north-west urban suburban fringe of Grantham.

- 5.1.4 To the north and west the landform falls at a steep gradient across the scarp slopes at the eastern end of the Belvoir Ridge with the wider expanse of the Belvoir Vale beyond. To the east the landform falls into a more contained and intimate valley setting of a tributary to the River Witham.
- 5.1.4 To the north-east, in the context of the site the landform extends across the ridgeline plateau before falling to the east towards Belton Lane and Belton Woods Hotel and Golf Club. In the 2007 South Kesteven Landscape Character Assessment, the setting of Great Gonerby was summarised as being of high sensitivity to the north, south and west, and medium to high sensitivity to the north-east in the context of the site. In summary, the site constitutes the least sensitive landscape associated with Great Gonerby.
- 5.1.5 This is reinforced through the lack of any landscape designation that would suggest an increased value or sensitivity to change, and there being no statutory or non-statutory designations that would prohibit the development of the site for residential purposes.



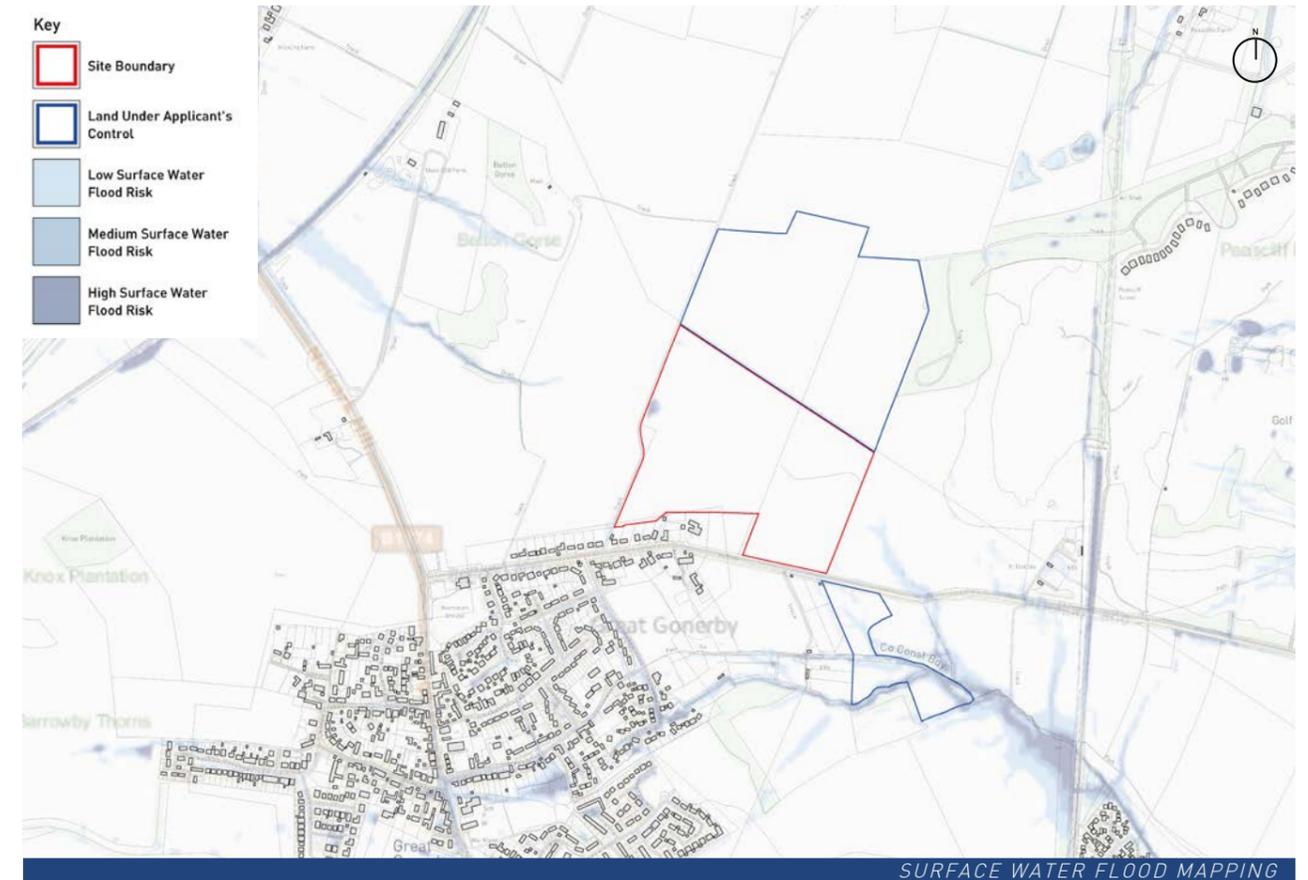
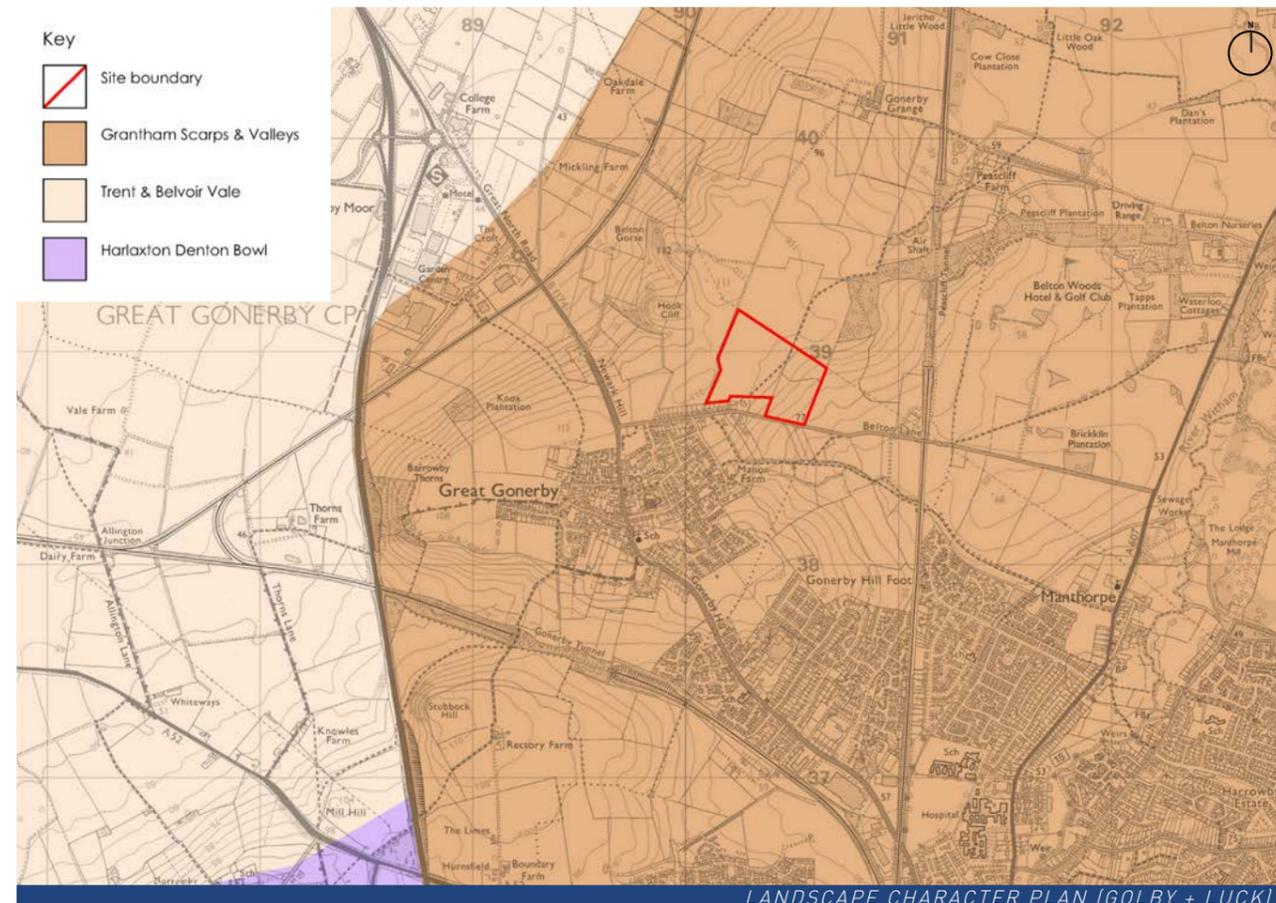
TOPOGRAPHY PLAN (GOLBY + LUCK)

- 5.1.6 The Site:
- a) Is not affected by TPO or designated areas of Ancient Woodland;
  - b) Is not located within any nationally or locally designated landscape;
  - c) Does not contain any nationally, regionally or local designated ecological habitats;
  - d) Is not in proximity to any SSSI sites

5.1.8 The key constraints of the site can be summarised as its elevated location, although it is no higher or prominent than the wider settlement, and any possible interrelationship with Belton House and associated Registered Park and Garden, although due to the intervening treed setting of the golf course this relationship is likely to be very limited.

5.1.7 The Site comprises land with an agricultural classification Grade 3 and is not considered to be 'best and most versatile agricultural land. This is consistent with the findings of the Grantham Capacity and limits to Growth Study undertaken by AECOM in July 2015,

5.1.9 The development has the potential to secure extensive structural landscaping measures and green infrastructure, extending the existing woodland character to the east to mitigate any visual effect on the wider setting of the valley, Grantham and Belton House.



## 6. FLOOD RISK, DRAINAGE & UTILITIES

### 6.1 Flood Risk & Drainage

6.1.1 When considering flood risk and drainage, this initial review has considered the site. From this it has been established that the site is within Flood Zone 1 and hence within the sequentially most preferable zone for proposed development.

6.1.2 As part of any proposals for the site, a full surface water drainage assessments will be undertaken. The approach will be to ensure on site attenuation ponds are provided and that the residual surface water runoff will be at the green field run off rate. Measures will be provided within the scheme to incorporate sustainable urban drainage scheme techniques (SuDS) to accommodate surface water discharge including the appropriate allowance for climate change.

### 6.2 Utilities

6.2.1 As part of any proposals for the site details of the existing utilities supplies within the local area will be assessed. This will include a review of the electricity, gas, water and telecommunications apparatus that are located in proximity of the site.

6.2.2 In the context of foul water discharge it is understood there is capacity within the existing system to accommodate new development and this will be reviewed as part of any detailed proposals for the site.

## 7. EMERGING LOCAL PLAN ISSUES & OPTIONS

### **QUESTION 6 – Housing Need and Requirement**

*Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?*

- 7.1.1 The Inspector’s final report on the current Local Plan (2011 - 2036) commits the Council to undertake an early review of the Local Plan from April 2020 with submission by the end of December 2023.
- 7.1.2 The Issues and Options document states that a number of policies in the adopted Local Plan require updating to ensure they are consistent with national policy or to enhance their effectiveness. Paragraphs 4.11- 4.12 recognises that the Local Plan housing target of 650 dwellings per year was based on information that is now largely out of date, and inconsistent with more recent government guidance on calculating housing need. Paragraph 4.14 states that as of April 2020, the national standard method results in a housing need figure of 754 dwellings per year for South Kesteven.

Dealing with this increased housing need through a plan-led approach is one of the key reasons for conducting an early review. However, it is noted that the Government’s most recently proposed Standard Housing Method Figure for South Kesteven is 839 dwellings per year. Although this figure has yet to be formally taken forward by the Government and is currently the subject of wider national review, South Kesteven must plan for the potential higher rate of growth going forward for a number of reasons. Firstly, because the current standard method figure of 754 dwellings per annum should be considered a minimum and not an upper limit to plan for. Secondly, because the plan would have a built in contingency should the higher proposed figure of 839 dwellings per annum become imposed upon the authority.

### **QUESTION 7a – Focus of Housing Growth on Grantham**

*Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals.*

### **QUESTION 7c – Larger Villages**

*Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities? If not, please provide details and any alternative proposals.*

- 7.1.3 (N.B. these comments also relate to QUESTION 5a – Settlement Hierarchy - Do you think the Settlement Hierarchy should be retained in the new Local Plan?)
- 7.1.4 South Kesteven District Council will need to develop an appropriate spatial strategy and identify where the higher quantum of housing growth will be distributed as part of the Local Plan review. Paragraph 4.20 notes that there seems to be no evidence to suggest that the distribution strategy of the new Local Plan should be changed significantly from the adopted Local Plan. However, it is noted that the evidence base that informed the spatial strategy for the Local Plan (namely the Settlement Hierarchy Review and the Settlement Hierarchy Update paper) simply score and rate settlements on the services and facilities accommodated within them. The evidence base around settlement hierarchy fails to take into account the relationships between larger villages such as Great Gonerby and the major town of Grantham.

- 7.1.5 The village of Great Gonerby is situated less than 1 mile north from Grantham with excellent connectivity along Grantham Road/Gonerby Road, yet this is not reflected within the Plan’s settlement hierarchy or Great Gonerby’s apportionment of growth within the Plan’s distribution of development strategy. Our client’s land at Great Gonerby presents an opportunity to accommodate large-scale residential development that benefits from close proximity to all the services and facilities of the major town of Grantham, yet does not compromise the integrity of Great Gonerby as a Large Village by resulting in coalescence with Grantham.

- 7.1.6 The site’s close proximity to Grantham means that it was captured within a Potential Direction of Growth area A within the Grantham Capacity and Limits to Growth Study (July 2015). However, the assessment work then broke down the broad Directions for Growth into specific locations 1 – 6, which omitted our client’s site. It is argued that in reviewing of the evidence base needed to update the Local Plan and ensure it meets the increased housing need, Area 1 (North of Manthorpe and Gonerby Hill Foot) should be broadened so that land to the north of Belton Lane is incorporated into the study area. This land provides an extensive area of land that would be capable of meeting the increased growth needs of Grantham as the town continues to grow and fulfil its role as a Sub-Regional Centre.



DESIGN



ENVIRONMENT



PLANNING



ECONOMICS



HERITAGE



19 November 2020  
201116 Issues and Options - Representations Harrowby Lane



Planning Policy  
South Kesteven District Council  
Council Offices  
St Peters Hill  
Grantham  
Lincolnshire  
NG31 6PZ

Maria Boyce



**By Email Only**

Dear Sir/Madam,

**Land to the North of Harrowby Lane**  
**South Kesteven District Council Local Plan Review (2041) Issues and Options Document**

This letter is sent in response to the South Kesteven District Council Local Plan Review- Issues and Options Consultation. Savills (UK) Ltd have been commissioned by Absolute Property Development Ltd to make representations to the Issues and Options Consultation in relation to their land interests at Harrowby Lane, Grantham.

The submission and comments made outline that the land north of Harrowby Lane is a deliverable and developable site to accommodate a sensitive residential development in line with National and Local Policy.

We understand the Issues and Options Consultation is being undertaken in line with Adopted Local Plan Policy M1 which requires the review of the Plan prior to 2023, as well as the inspectors recommendation. Given the evolving housing land supply position in South Kesteven, we are fully supportive of this Local Plan review which is required to bring the Local Plan in line with the Governments aspirations to deliver 300,000 dwellings per annum.

Specific commentary has been provided below in response to the questions of relevance outlined within the Issues and Options Document.

A Vision Document has been prepared for the site which outlines 2 options for the development of the land (both of which are to be assessed separately) for:

- Option 1: 50 dwellings
- Option 2: 25 dwellings

The Document and Plans demonstrate the full technical evidence base required to demonstrate the site's deliverability (0-5 years) and therefore as a site that can make a meaningful contribution to the district's housing land supply in the short term.



## **Commentary on the Issues and Options Document**

### **QUESTION 1 Objectives**

#### **Do you agree that the Objectives should remain the same for the new plan? If not then please provide details**

We support the objectives of the adopted Local Plan and suggest these remain for the Local Plan Review. We particularly support objective 6 which seeks to enhance the role of Grantham as an important Sub-Regional centre by ensuring the town is the main focus for new housing, employment and other facilities.

**Recommendation One:** Retain the Objectives outlined within the adopted Local Plan through the Local Plan Review to 2041.

### ***QUESTION 3- Policies not proposed to be changed significantly***

#### ***Q4- Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.***

Proposal 3 outlines the policies not proposed to be changed significantly through the Local Plan review. Policy SP4 'Development on the Edge of Settlements' is included in the list of policies to be retained through the Local Plan. We do not consider that this approach aligns with the NPPF, particularly with regard to the need to take a more pragmatic view of windfall sites, as outlined in the Housing Delivery Test Action Plan (2019, updated 2020).

The policy is overly restrictive with regards to gaining 'substantial community support' for proposals and Local Plan Policy SP4 must be reviewed in order to ensure further flexibility in the way that the policy is applied, particularly on the edge of Grantham, as the District's major settlement.

An overriding aim outlined within the National Planning Policy Framework (NPPF), is to ensure that Plans are 'prepared with the objective of contributing to the achievement of sustainable development', and are prepared in a way that is 'aspirational but deliverable'. This approach is supported through Paragraph 11 of the NPPF:

*'Plans should positively seek opportunities to meet the development needs of the area, and be sufficiently flexible to adapt to rapid change'*

Incorporating flexibility also ensures that development will be market led and any deliverability issues with allocated sites (which results in fewer or no development being brought forward) can be compensated for on sites elsewhere, ensuring development still meets the identified need of the settlement.

**Recommendation Two:** Review Local Plan Policy SP4 to ensure sufficient flexibility for edge of settlement sites to come forward.

### ***QUESTION 5a- Settlement Hierarchy***

#### ***Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not please provide details of what changes you think should be made.***

We agree that the Settlement Hierarchy outlined within the adopted Local Plan should be retained through the Local Plan Review. The distribution of dwellings across the District at a level proportionate to the level of shops and services in each settlement.

Whilst we support the key issues and opportunities outlined within the Issues and Options consultation document regarding providing support to a diverse local economy and thriving Town Centres, we feel it will be particularly important to ensure that the direction of future growth is well located in recognition of the significant positive impact residential development can have in supporting the sustainability and vitality of existing Market Towns.

National Planning Policy Guidance shows support for this approach, stating that:

*‘Residential development in particular can play an important role in ensuring the vitality of town centres, giving communities easier access to a range of services’.*

Proposal 1 as outlined within the Issues and Options document, seeks to strengthen the role of Grantham as a Sub-regional Centre through significant housing growth. The aim outlined within the consultation document is for Grantham to provide for both the local community and visitors from a wider area.

We support this objective and encourage the council to continue directing significant growth to Grantham to achieve this aim.

**Recommendation Two:** Support the vitality of the existing shops and services in Grantham by allocating sufficient suitable sites for residential development in and around the Market Town, particularly on accessible sites within easy walking distances to services and amenities.

**QUESTION 6 – Housing Need and Requirement**

***Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?***

This Local Plan review is being undertaken, in part, due to the adopted housing target of 650 dwellings per annum being based upon out of date assessments of housing need and the introduction of the Standard Method for calculating housing need in 2018, which has increased the housing requirement of South Kesteven to 732 dwellings per annum. The NPPF expects strategic policy making authorities to follow the standard method for calculating local housing need.

Changes to the standard method for assessing local housing need were released through the ‘Changes to the Current Planning System’ consultation in 2020. These changes use the most recent data and seek to achieve a better distribution of homes according to need and support the Governments ambition to support 300,000 homes a year. Figures referred to as ‘Standard Method 2’ were the result of these amendments.

Utilising the calculations within Standard Method 2, South Kesteven are required to deliver a minimum of 839 dwellings per annum. Whilst Standard Method 2 is currently in consultation stage, we believe this demonstrates a clear direction of travel, with the identified housing requirement of the District likely to increase. This should be considered and planned for at this early stage of the Local Plan review to ensure robustness.

Given the early stage of this review, South Kesteven should seek to ensure that their process is robust to avoid an early review. We strongly believe that the housing need for the District should therefore be increased to 839 dwellings as a minimum.

The NPPF requires Local Planning Authorities to be aspirational in their plan making. NPPG is clear that the Standard Method identifies a minimum housing need figure. In combination with the 2019 Housing Delivery Test result, which outlined a historic under-delivery in South Kesteven and subsequently recommended a buffer be applied to the housing requirement of the district, the Local Planning Authority must take this opportunity to plan positively and ambitiously with the aim of meeting the housing requirement of the district as a minimum and making up for historic under-delivery.

**Recommendation Four:** Plan for the increased housing need outlined within Standard Method 2 (839 dwellings per annum) as a minimum.

***QUESTION 7a – Focus of Housing Growth on Grantham Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals.***

Whilst we are supportive of the distribution of growth to all levels of the hierarchy across South Kesteven, we agree that the focus of growth (50-55%) in the district should be Grantham.

As previously outlined, Grantham is home to a number of shops and services as such, any growth in this area of the district would benefit from easy access to a range of services and minimise the requirement of future residents to travel.

In addition, Paragraph 68 of the NPPF recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area. This is considered to be particularly relevant in the short term, as such small and medium sites can often be developed and delivered relatively quickly. In recognition of this important contribution, the site is considered to be particularly appropriate for accommodating levels of growth in line with the spatial strategy.

Finally, given the historic under-delivery in the District, which has been highlighted by the Housing Delivery Test, South Kesteven have created an Action Plan to promote development through the District. One action within the Action Plan is to take a more pragmatic and positive view with respect to applications on windfall sites within Grantham and the wider district. This suggests that the reliance on windfall sites has been ineffective previously. Therefore growth in these locations should be planned for decisively through the use of positive planning policies and appropriate allocations such this site.

The land north of Harrowby Lane presents a clear opportunity to deliver sustainable development in Grantham, supporting local services and contributing to the vitality of the market town. The Vision Document outlines the technical evidence to support its allocation.

**Recommendation Five:** Continue to direct much of the Districts required growth to Grantham.

**Recommendation Six:** Allocate the Land to the North of Harrowby Lane.

***QUESTION 7e – Consideration of the Market and Deliverability\* Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?***

Yes – this is an extremely important consideration, not least because the alternative approaches for South Kesteven have not worked. Given the historic under-delivery in the District, which has been highlighted by the Housing Delivery Test, South Kesteven’s Action Plan specifically highlights the issues with the current allocations in terms of deliverability. The Action Plan champions a more proactive, pragmatic and positive view with respect to applications on windfall sites within Grantham and the wider district. Therefore growth in such appropriate locations should be planned for decisively through the use of positive planning policies and appropriate allocations such this site.

**Recommendation Seven:** Allocate the Land at Harrowby Lane to as a deliverable short term site, with market interest and funding for a revised application to be submitted immediately.

**Land to the North of Harrowby Lane**

These representations have been submitted with specific consideration to land to the North of Harrowby Lane. The development represents a sustainably located development on the edge of a defined built edge to Grantham providing a mix of housing and choice and the potential to contribute to a range of developer contributions including affordable housing, education and health contributions.

The site has the following benefits:

- Outside of settlement limits, the site at Harrowby Lane is undoubtedly one of the most sustainable locations for development within Grantham. There are a range of existing facilities, including Belmont Community Primary School, Harrowby C of E Infants School, Harrowby Lane Doctors Surgery,

Harrowby Lane Methodist Church, Tesco Express, local shops and takeaways, children's equipped play area and hard courts for football within walking distance of the site. The services already serve the immediate neighbouring areas and will be available to the proposed development when it is completed.

- The development will have a strong identity and sense of place that reflects its urban fringe location. New development, together with existing homes and facilities will add to the well served neighbourhood, with new green infrastructure, incorporating and building upon the existing ecology, will provide coherent connections and an attractive, well managed landscape setting for the new homes whilst providing opportunity for active leisure and play in a natural environment.
- The illustrative masterplan options set the framework and guidelines for a high quality design and architectural response for a future planning application.
- The site provides significant accessible new green infrastructure, incorporating and building upon the existing ecology to provide a net biodiversity gain across the site.
- The scheme will also facilitate wider connections and access to the countryside and recreational amenity areas such as Alma Woods Extensive consultation has been undertaken with the Woodland Trust, who are promoting their own woodland initiatives as part of Heritage Lottery Funding received. The proposals would help increase public access to these proposals and would provide a continuation of the woodland experience through the site, proving better connections to other recreation areas such as the Hills and Hollows. The NPPF (2019) states at para 200 that *"Local planning authorities should look for opportunities for new development....within the setting of heritage assets, to enhance or better reveal their significance"*.
- The scheme provides a robust drainage solution through use of sustainable urban drainage and would lead to a betterment of the pre-existing groundwater issues by rectifying existing water run off through the provision of a comprehensive drainage system.

Given the very limited impact of the development, the revised proposals for the site demonstrate it a clear contender for residential allocation which in tandem will deliver many public benefits.

We would be delighted to discuss proposals for the site with you in more detail.

Yours sincerely



**Maria Boyce MRTPI**  
Director

# Harrowby Lane

Vision Document for a deliverable, sensitive extension to Harrowby



# Harrowby Lane

The vision for Harrowby Lane is set out as a series of design principles that together establish a high quality extension to the Harrowby neighbourhood of Grantham.

The proposals will help create an improved urban edge to the town and deliver between 20-50 new family homes in line with the housing needs of the area.

## LEGEND

- Public Space
- Private Gardens
- Water Retention
- Roadways
- Shared Access
- Shared Road
- Decking

## Vision

The Local Plan Review for South Kesteven provides an ideal opportunity to consider new sites for growth within the District. Major growth continues to be promoted within Grantham as a key economic centre not only within Lincolnshire, but sub regionally.

As highlighted in the recent Inspector's Report, a range of sites will clearly be required to deliver this growth through a combination of town centre sites, the major urban extensions and sustainably placed urban fringe locations.

Harrowby Lane has a long planning history and as such a wealth of information is available to support its development. This Vision Document outlines two proposals for the smaller and medium scale development of the site. Both options have been carefully designed within the existing contours of the land to ensure that landscape impact is minimal. The land at Harrowby Lane offers many benefits, including:

### A sustainable location

The neighbourhood will be well connected by bus to Grantham town centre and the wider public transport network to further reduce dependence on the private car.

### New homes with a strong identity

Harrowby Lane will have a strong identity and sense of place that reflects its urban fringe location. New development, together with existing homes and facilities will add to the well serviced neighbourhood.

### Landscape led design

New green infrastructure, incorporating and building upon the existing ecology, will provide coherent connections & form an attractive, well managed landscape setting for the new homes whilst providing opportunity for active leisure & play in a natural environment.

### Connections and Access to Local Area and Wider Countryside

The existing network of footpaths, cycleways & roads will provide convenient connections to Alma Wood, local education & play facilities including nearby shops.



# Content

## Introduction

This document has been prepared to support the allocation of land at Harrowby Lane for the development of approximately 25-50 dwellings on the eastern edge of Grantham.

The document has been prepared the following team of consultants:

- » Savills (UK) Ltd – Planning and Heritage
- » ArkleBoyce Architects - Architecture, Masterplanning and Urban Design
- » Urban Wilderness – Landscape Architecture
- » Curtins – Transport, Access, Drainage and Ground Conditions

From analysis and evaluation of the land it is evident that the site has the potential to create a deliverable, developable and sustainable scheme.

## Purpose

The purpose of this document is to consider the capacity and technical ability to deliver growth at the land at Harrowby Lane, on the eastern edge of Grantham ('the site') and evidence how sustainable development could be delivered, taking into account the most recent appeal decision for the site.

The Vision Document considers how development on the site could come forward in line with the growth aspirations of South Kesteven. The document considers:

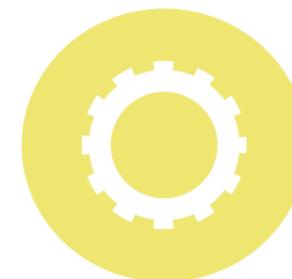
- » The site, its setting, placing it in the wider setting of Grantham
- » The technical challenges of delivering development on site, including landscape and visual impacts, heritage impact, topography, drainage, highways and ground conditions.
- » A vision and concept framework for sustainable development for the site.

## Background

Grantham is the main focus for growth within the area over the next 20 years as the key economic centre within the District. Given the level of growth required within and around the town the nature of the urban area and surroundings will change dramatically over the next 20 years. A range of housing sites of varying scales are required to achieve the growth and ensure that there is adequate and unconstrained land for development available to the market.

This document has been produced as part of the SKDC Call for Sites consultation and follows from a planning application and subsequent appeal made on the land.

The issues raised by the appeal have been thoroughly assessed and through the technical analysis a reduced scheme has been prepared addressing the landscape and heritage issues in full and the resulting revised scheme is submitted for consideration.



SITE  
CONTEXT



PRINCIPLE OF  
DEVELOPMENT



A SENSITIVE EDGE TO  
HARROWBY



SITE CONTEXT

# Location

The site is positioned on the eastern edge of Grantham on Harrowby Lane. The site abuts existing development in the form of 1970's sub-urban housing which is low to medium density. This housing is characterised by the significant green spaces and generous proportions given to the primary (loop) roads running through the site.

This is partly due to the change in level experienced by some of the housing, although the layout of the development is similar in areas where the topography is much flatter.

The site itself is greenfield and is currently used to graze livestock. The land is enclosed by established hawthorn hedging and self-seeded, semi-mature, ash and field maple along the Harrowby Lane boundary. The remaining boundaries are comprised of fragmented and overgrown sections of hawthorn, punctuated by occasional over-mature ash.

The land slopes from west to east and forms the lower to middle part of the ridge which runs to the east of Grantham. The site boundary however falls short of the ridge, and provides views across Grantham in a north-westerly direction. The site forms a generally consistent slope with the exception of a central area which projects slightly to form a 'headland'.

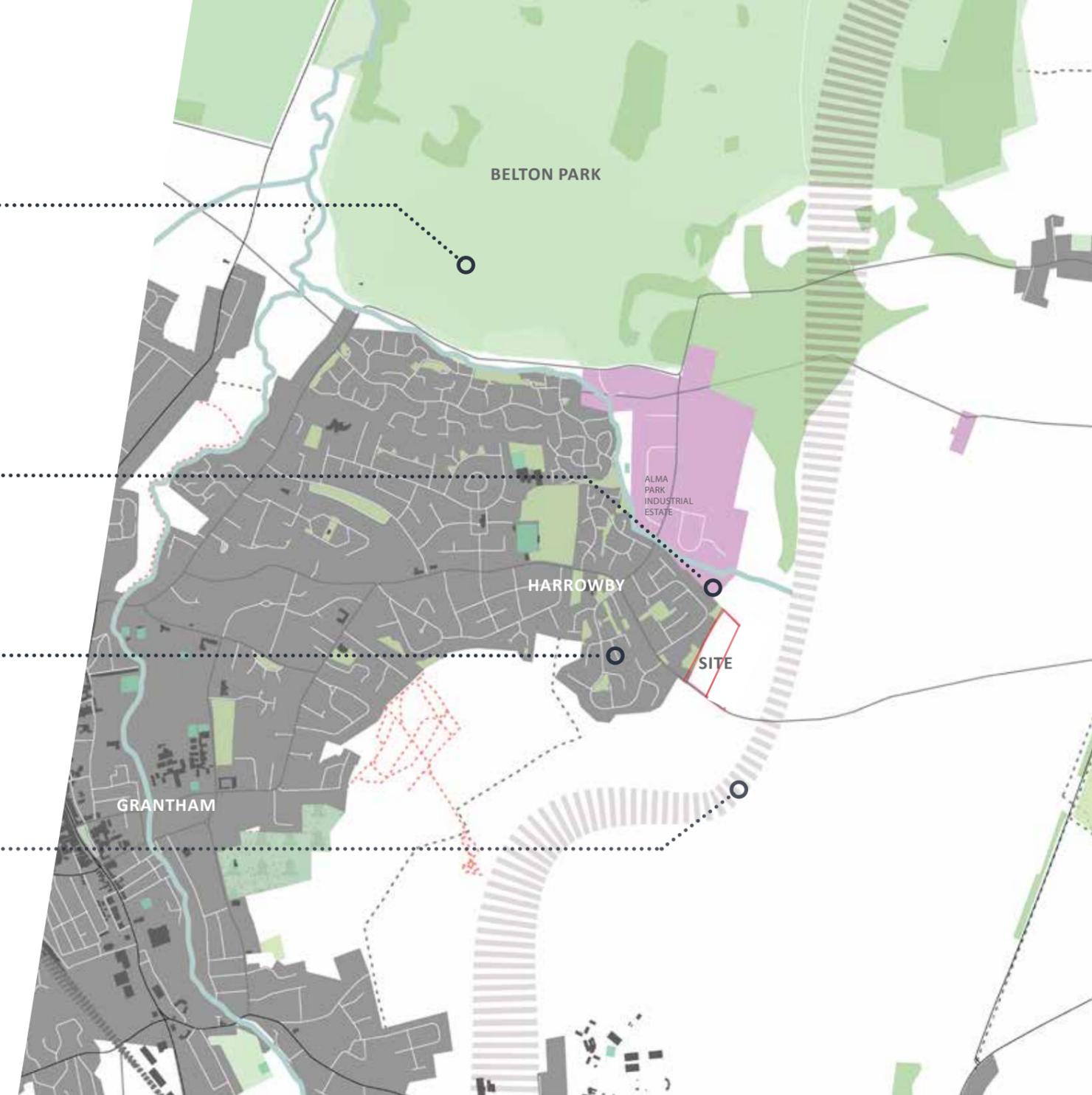
Site access can be obtained from three main points and there appears to have been gaps left within the adjoining 1970's housing development for the potential development of this site.

The local character along Harrowby Lane to the East is 1970s, 80s and 90s small to medium sized dwellings, offering medium to high density housing estates set on large loop roads and cul-de-sacs. The houses are located set within small to medium sized plots with generally small front and larger rear gardens. These dwellings are mainly two storey houses, interspersed with some bungalows.

Belton Park Golf Club is located c.1.5km from site and forms part of the Belton Park English Heritage Registered Park and Garden and which contains the Grade I listed Belton House.

To the North of the site sits a narrow strip of industrial buildings, Alma Park Industrial Estate.

The area around the site is on steadily rising land which plateaus around Canberra Crescent. The land then rises steeply to the East and South to form a ridge, covered by a mixture of open arable land and woodland.





SITE CONTEXT

# Local Character

The site is currently being used as pasture for grazing animals. Immediately to the west, the site predominately backs onto housing along Fifth Avenue with areas used for an informal children's play area and a managed green embankment.

### Local Vernacular

In terms of the use of materials there is wide variation across the area, however, almost all would be generally considered as traditionally built; brick and tile. Brick is the predominant walling material throughout. There are many different colours, textures and finishes, from red, orange and buff bricks. Immediately to the west of the site along Ninth Avenue the houses are constructed from buff bricks with painted horizontal timber cladding.

Roofs are a mix of clay tile, either traditional plain tiles but mostly machine cut plain, or concrete interlocking tiles. There is the occasional use of modern pantile. Some natural slate survives to the older houses.

### Parks and Recreation

There is good provision of public open space throughout the area with a combination of pockets parks and green ways forming an integral part of new developments and aligned with a retained historic field boundaries and tree belts. The new development provides the opportunity to improve the access and surveillance to these spaces. There are large recreation and sports fields linked to schools, often with full public or semi-public access and connected by public rights of way.

### Trees and Hedges

There are only a few trees located within the site, with the highest concentration found along the boundaries to the north and south.

To the west, beyond the site boundary, there is a small informal managed green embankment with some mature ash and oak trees and overgrown hawthorn hedgerows. The site's boundary comprises mainly hawthorn and bramble hedgerows, the vast majority of which are proposed to be retained and enhanced where appropriate.

### Landscape Character

Landscape character is defined by the ridge which serves to enclose the urban realm and provides a sense of visual containment. Alma Wood provides woodland cover along the ridge north of site. Other dispersed field boundary trees and hedges form a verdant approach to the town from the south and provide a green backdrop to Grantham when viewed from the opposite side of the valley.

View from site looking down Fifth Avenue and one of the existing small recreational areas





# Technical Analysis

As part of the masterplanning process a range of technical issues have been reviewed to inform the design solution and quantum of development that is achievable on the site.

## Highways and Movement

There are no public rights of way through the site, however there is an existing right of way adjacent to the boundary to the north, accessed through the children's play area on the corner of Fifth Avenue.

Vehicular movement is along the primary highway towards High Dike and Grantham Town Centre with secondary routes feeding residential estates. Pedestrian and cycle routes are only provided via the adopted footpaths.

## Access

Site access can be obtained from three main points. At two locations off Fifth Avenue there are road spurs that end abruptly suggesting that there was once the plan to extend the adjoining 1970's housing development at a later stage. These spurs create undesirable dead ends with no frontage and there is great potential to integrate these into the development of this site to provide an improved urban edge to the estate.

## Drainage

Based upon an agreed set of assumptions a Quick Storage Estimate (QSE) has been calculated for both a 100 year and 30 year plus climate change event based on 5 l/s and 1 ha for each half of the site. This provides an approximate volume of storage required in the development of the site.

The masterplan layout has been developed to ensure that the amount of storage can be accommodated on site. The eventual drainage solution will be determined at a later stage but could include SUDS, swales, ponds, permeable paving, underground tanks or a combination the above.



The technical analysis demonstrates that the development is both deliverable and credible creating a robust evidence base to support its allocation in the South Kesteven Local Plan.

## Topography

The highest point of the site is along the eastern boundary and slopes down towards the western boundary by approximately 20m. The site is divided by a natural high ridge running east west. The masterplan has been based on an accurate topographical survey of the site and its surroundings.

## Amenity of Existing Dwellings

The site has dwellings located along the boundary to the West. These existing dwellings at the closest point are located approximate 12m from the site boundary, increasing to 25m as the dwellings move towards the South. Due to the potential level differences, proposed dwellings along this boundary are set back to avoid any unnecessary loss of privacy.

## Solar Orientation

Dwellings will predominately face East and West with gardens benefitting from the sun for much of the day. The position of the internal rooms should make the best use of the orientation.

## Utilities

There are two existing overhead power lines which run across and the site and along the boundary to the East. These cables are buried as they move towards the residential settlement and it is the intention that these will be buried within the site to facilitate any new development.

There is currently no gas supply to the site and no water mains across the site. The covered reservoir to the South East has a concentration of distribution pipes running parallel with Harrowby Lane.

## Foul Water

There are currently no sewerage services running across the site. The existing infrastructure to the West will allow for connections into the adopted network. These are either to the North at the corner of Fifth Avenue or to the South along Harrowby Lane. Both these locations work well with the site levels and prevent the need for pumping stations.



# Facilities and Amenities



LOCAL SHOPS



GRANTHAM HIGH STREET



SUPERMARKET



RECREATIONAL AMENITY



LOCAL OPEN SPACE



EMPLOYMENT



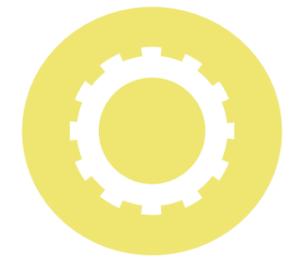
EDUCATION



GRANTHAM TRAIN STATION

There are a range of existing facilities, including Belmont Community Primary School, Harrowby C of E Infants School, Harrowby Lane Doctors Surgery, Harrowby Lane Methodist Church, Tesco Express, local shops and takeaways, public houses, a children's equipped play area and hard courts for football. These facilities are all within walking distance to the site and already serve the immediate neighbouring areas and will be available to the proposed development when it is completed.

The town centre is located approximately 2.5km away offering a variety of retail outlets, restaurants and cafes as well as Grantham Station which provides local and national rail services across the country.





PRINCIPLE OF DEVELOPMENT

# Planning Context

This section is intended to provide a strategic overview of planning policy and identify areas of common focus that can be brought through into a future planning application made for the site. The importance of the Development Plan is clear given the requirements of Section 38(6) of the 2004 Planning and Compulsory Purchase Act whereby all planning applications have to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Document	Relevant Policy/ Commentary	Document	Relevant Policy/ Commentary
Grantham Townscape Assessment	<ul style="list-style-type: none"> <li>» The site lies to the edge of character area 7C – Londonthorpe and Harrowby Lane (east).</li> <li>» A notable characteristic of the area is the views to tree lined ridge to east and west. Mostly two storey and bungalow development, strong presence of trees, wide streets with grass verges. Much of the development is inward facing.</li> <li>» Post war housing with topography rises steadily to south and east. The area is not considered to be legible and lacks a sense of place. Many areas have dead frontages onto principal routes.</li> <li>» There are no statutory listed buildings and no designated conservation area within this character area.</li> <li>» Whilst the eastern edge is sensitive to change, where development maintains views limited expansion could be possible. Views should be retained to the ridgeline and buildings of an appropriate scale located in such a way so views are not impeded.</li> <li>» There are also opportunities to enhance green boundaries and urban edge of the area.</li> </ul>	South Kesteven Landscape Sensitivity and Capacity Report (2011 and 2013)	<ul style="list-style-type: none"> <li>» The study relates to the landscape capacity of specific sites within the Grantham area. The document assesses the landscape capacity of sites and their suitability of development.</li> <li>» Some of those that are classed as sensitive to change and that have a low capacity for development have been assessed as suitable for housing within the 2015 SHLAA indicating that housing development could be accommodated on site subject to detailed development proposals coming forward.</li> <li>» The 2013 assessment included the review of some additional sites. This indicated that Study Area C Harlaxton Close – which is a similar scale to Harrowby Lane is designated as sensitive in the LCA and as a SAP is identified as having capacity for development.</li> <li>» Although partly covered by previous Local Plan Policy EN4 ‘Prominent Areas for Special Protection’ it is the higher, more steeply sloping fields rising to the ridge of high ground to the south that are prominent and more sensitive;</li> <li>» Views of the area are limited and there is scope for mitigating potential visual impact.</li> </ul>
South Kesteven Landscape Character Assessment (2007)	<ul style="list-style-type: none"> <li>» Area is defined a sensitive landscape area, although the particular areas of sensitivity includes Belton Park and protecting the gaps between Grantham and the adjacent villages.</li> <li>» Built development on higher scarp slopes or skylining should be avoided.</li> <li>» New development and structural landscape can be used to soften existing harsh urban edges.</li> <li>» Maintain a varied urban edge with fringes of countryside extending into the town.</li> <li>» Opportunities for enhanced access to the countryside around the edge of the town should be considered in development proposals.</li> <li>» Where existing development occurs on higher ground, tree planting proposals to soften the roofscapes on the skyline should be considered.</li> </ul>	AECOM Grantham Capacity and Limits to Growth Study	<p>The AECOM Report provides a very broad overview of the suitable directions for growth within the town and acknowledges its limitations in the suitability of development on smaller sites. It:</p> <ul style="list-style-type: none"> <li>» States “land identified as not suitable for development may have the potential to remain suitable for smaller scale development”</li> <li>» The site lies within “Area 2 – east of Grantham” and “Zone C”</li> <li>» The report highlights the land is Grade 3 agricultural land (although much of the last in the area is Grade 2).</li> <li>» Harrowby Lane identified as one of most suitable areas for development in terms of transport and accessibility.</li> <li>» Harrowby Lane identified as attractive cycling route.</li> <li>» Any development in this area to be promoted at Harrowby Lane / Somerby Hill.</li> <li>» The landscape sensitivity is highlighted, particularly to the setting of the town.</li> <li>» Highlights that there area high barriers to affordable housing which can be rectified through development.</li> </ul>
Belton House Setting Study	<ul style="list-style-type: none"> <li>» Site not within the area that can be seen from the roof of Belton House.</li> <li>» Site not within area visible from first floor viewing platform of Bellmount Tower</li> <li>» Area visible from approach points and development in the foreground of these views classed as sensitive.</li> </ul>		

Name / Allocation Ref	Townscape Assessment 2011	Landscape Character Assessment 2007	Landscape Sensitivity and Capacity 2011	Landscape Sensitivity and Capacity 2013	Belton House Setting Study 2010
Northern Quadrant GR3-H2 GR3-H3	<ul style="list-style-type: none"> <li>• 17b – Landscape Fringe – important views from Great Gonerby</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Low and Medium Landscape Sensitivity.</li> <li>• GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H3 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Part of site visible from roof of Belton House</li> <li>• Visible from Bellmount Tower</li> </ul>
Southern Quadrant GR3-H1 GR3-H5	<ul style="list-style-type: none"> <li>• 17e – Landscape Fringe</li> <li>• Green rim which <b>encircles</b> town deemed important</li> <li>• Ecological issues and <b>landscape issues need to be treated with care.</b></li> <li>• Very important archaeological remains.</li> </ul>	<ul style="list-style-type: none"> <li>• Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H5 is identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not visible</li> </ul>
Manthorpe GR3-H4	<ul style="list-style-type: none"> <li>• 17a – Landscape Fringe – <b>retain open setting of Manthorpe</b> and St John’s Church</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• GR3-H4 is identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Part of site visible from roof of Belton House</li> <li>• Visible from Bellmount Tower</li> <li>• Visible from outside of park</li> </ul>
Southern Gateway Employment GR-SE1	<ul style="list-style-type: none"> <li>• 17d – Landscape Fringe – open views in all directions.</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Medium Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Identified as Moderate Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Minor part of site in <b>Element 1 – Exceptionally Sensitive to Major Development</b></li> <li>• Minor part of site visible from roof of Belton House</li> </ul>
Low Road, Barrowby LV-H3	<ul style="list-style-type: none"> <li>• 17c – Landscape Fringe</li> <li>• Green rim which <b>encircles</b> town deemed important</li> </ul>	<ul style="list-style-type: none"> <li>• Identified as <b>High Sensitivity</b></li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not visible</li> </ul>
Easthorpe Road, Great Gonerby LV-H8	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Medium-High Landscape Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• Not assessed</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Element 1 and 3 – Exceptionally / Very Sensitive to Major Development</b></li> <li>• Visible from Bellmount Tower</li> </ul>



PRINCIPLE OF DEVELOPMENT

# Planning History

The purpose of this promotion document is to demonstrate that the land at Harrowby Lane is a technically sound site that can accommodate housing within short term to assist in meeting the housing needs of Grantham, as the main focus for growth within South Kesteven.

## Planning History

An outline application was submitted for the site in March 2017 for a residential development of up to 100 dwellings (Use Class C3) with associated access, open space, landscaping and infrastructure improvements (application ref: S17/0566).

On the 14th February 2018 the permission was refused for the following reasons:

1. Impact upon landscape;
2. Impact local heritage assets;
3. Absence of a sustainable drainage scheme;
4. Limited information in respect of a mineral assessment;
5. Unable to demonstrate that infrastructure required for the proposal would be provided;
6. Insufficient mitigation for the adjacent Alma Park Local Wildlife Site

Following this, an appeal was made on behalf of our client Absolute Property Development Ltd against South Kesteven District Council's decision to refuse planning permission on the site.

At the appeal the development was reduced from 100 units to up to 75 units in which a larger area of grassland would be retained, thereby addressing concerns about the effect of the proposal on the grassland habitat and the wider ecological network.

Following the submission of additional documentation in respect of drainage and mineral matters and revised section 106 agreement, the Council agreed as part of the Statement of Common Ground that these reasons for refusal were no longer contested, thus demonstrating the site is relatively unconstrained in terms of technical issues.

The two issues debated as part of the appeal were:

- 1) The effect of the proposal on the landscape character of Grantham;
- 2) The effect of the proposal on the setting of a number of designated heritage assets

The Inspector found that the proposed development would have a harmful effect on the landscape setting of the town, and that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets. For these reasons, the appeal was dismissed on 10th July 2019.

Following the appeal decision and recent conversations with South Kesteven District Council the client is looking to reduce the development on the site even further, as detailed on page 18-19.

Through the two options proposed as part of this Call for Sites submission, the impact on landscape character and setting of heritage assets is completely addressed, as set out in the adjacent table and detailed through the remainder of the Vision Document.

## Response as part of Application and Appeal

## Response as part of the Reduced Options (50 and 20 units)

<b>Transport</b>	The site is in an extremely sustainable location and well connected to local facilities and public transport. The traffic impact of the proposed development on the highway network was assessed and deemed to be very low. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Further reduce the impact on the local network given the smaller scheme, of either 50 or 20 dwellings.
<b>Access</b>	Vehicular, cycle and pedestrian access into the site is to be taken from Harrowby Lane was agreed as part of the outline application. <b>There were no highways objections to the proposals as part of the Planning Application.</b>	Access to remain the same as previous proposal.
<b>Drainage/ Flood Risk</b>	A revised drainage strategy (2018) was prepared by Curtins as part of the Appeal process. Lincolnshire County Council's Environment and Economy Directorate (LCC) agreed the it represented a sustainable drainage system (SuDS). The proposed drainage strategy also provides betterment through the provision of a filter drain type of arrangement to alleviate pre-existing surface water flooding issues. <b>There were no drainage or flood risk objections to the proposals as part of the Planning Application/Appeal.</b>	The reduced scheme still utilises the drainage strategy as agreed as part of the Appeal and so will represent a sustainable drainage system and benefit residents on lower ground.
<b>Minerals</b>	LCC agreed as part of the application and appeal process that the site is unsuitable for minerals extraction and that the development of the site would not sterilise land for future minerals extraction. <b>There were no minerals objections to the proposals as part of the Planning Application/Appeal.</b>	The same applies.
<b>Landscape</b>	The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment  It is our view the site forms a relatively small part of the landscape setting of Grantham and there are other areas of land such as the prominent Hall's Hill which contribute significantly more. The development was anticipated to have beneficial long term effects on the eastern edge of Grantham, through the visual continuation of woodland across the ridgeline and tiered planting throughout the development	The reduced schemes detailed within this Vision Document would involve development on the lowest levels of the site only, containing the built visual envelope, which would have limited landscape impact, as acknowledged by the Appeal Decision (para 14).
<b>Heritage</b>	The Inspector found that there would be less than substantial harm to the significance of the setting of a number of designated heritage assets, bar Harrowby Hall and Arch.  It should be noted that remaining heritage assets are located at a distance from the site, two of which had no intervisibility. The impact as such would be very minor and certainly less than many other approved schemes in Grantham. The Heritage Impact Statement stated that the development would not undermine heritage values.	The reduced scheme detailed in this Vision Document would be located on the lowest levels of the slope meaning the visual impact and interface between the site and any heritage assets would be nil. The scheme has been designed to take into account the contours of the land and will sit behind the existing rooflines to ensure there will be no impact on long range views, including those from listed buildings.



PROPOSALS AT HARROWBY

# Proposals at Harrowby

The proposals have responded directly to the Inspector's comments made as part of the appeal (APP/E2530/W/18/3208890) where it was suggested at paragraph 14 that the lower levels of the site could form part of the visual envelope of the town and do not contribute to the open and natural appearance of landscape character.

As such, the this vision document presents 2 options for assessment as part of the Call for Sites that concentrate development on the lower slopes, working with the contours so that houses sit behind the existing built form and do not encroach up the slope.

The options will achieve an average density of approximately 15-22 dwellings per hectare which while low density, provides a balanced approach to housing and green space and responding to the existing context. The scale of the development will be predominately 2 storey. In terms of a variety in the heights and massing of the buildings, this is achieved through the use of a range of house types and sizes ranging from smaller 2 bed units to 4 bed plus bedroom houses.

This range of house types will also affect the massing by providing a change in the eaves and ridge height creating subtle changes in scale. Landmark buildings, focal points and a clear hierarchy of routes and intersections are considered to increase the legibility of development.

	OPTION 1	OPTION 2
SITE AREA	2.25 hectares	1.65 hectares
AMOUNT	50 Dwellings	25 dwellings
SCALE	1.5/2 storeys	1.5/2 storeys
MIX	2, 3 and 4 bedroom homes	2, 3 and 4 bedroom homes
AFFORDABLE HOMES	Policy compliant	Policy compliant
PUBLIC BENEFITS	<ul style="list-style-type: none"> <li>• Boost supply of housing - in an area where a five year supply of housing land is not currently in place;</li> <li>• Ecological enhancement - through retention of existing planting and new planting features;</li> <li>• New public open space - including new areas of play;</li> <li>• Improve access to Alma Wood;</li> <li>• Creating a high quality built environment;</li> <li>• Improvements to the existing drainage of the area;</li> <li>• Contributions to services and infrastructure via S106</li> </ul>	





# Design

The style of the new dwellings will respect and reflect the local architecture surrounding Grantham, which forms a strong link to Lincolnshire's rich rural history. The eventual design strategy will incorporate best practice design principles to ensure that dwellings are built to a high quality and standard. The layout ensures that privacy standards and the streetscape are not compromised through the topography of the site.

## Design

Houses are arranged to create an attractive setting of roof forms and vistas towards the site and within the site itself.

House layout and orientation will respond to its position within the site, the immediate topography and its position relative to footpaths, open areas and other carefully interlaced green spaces.

Pitched roofs with primary gable elevations will create interest and formality to the dwellings, especially when viewed as part of the streetscape. Careful and sensitive design of primary facades and a family of details for windows, entrances and recessed porches, will ensure the design forms its own identity without reverting to pastiche or imitation.

The architectural design as illustrated within the document is largely indicative, for the purpose of layout only. Further design development would need to take place to develop the architectural detail.

## Working with the Levels

Working closely with the existing levels, the dwellings have been positioned to coordinate with the contours by creating plateaus of development. This will allow for dwellings adjacent to the highway to remain predominately at the same level.

The spaces between the dwellings front to back are used to take up the difference in levels across the site. At the most extreme locations, split level dwellings and large landscaping zones will help to overcome these challenges.

## Relationships of Houses to Roads

In order to enclose space effectively, buildings will be sited close to the back edge of the public footway and this will require car parking to be sited between houses or within garages. This has the advantage of reducing the visual impact of on-site parked cars and to increase the amount of site area available for private rear gardens.

## Rear Privacy

Residents have high expectation of privacy from the private or garden side of the dwelling. In a medium density layout it should be possible to avoid any overlooking. Every effort has been made to avoid overlooking of rear facing living room windows. This has been achieved by considered design, building orientation, working with the existing site levels and innovative landscape led proposals.

## Garden Sizes

A minimum private rear garden of 75m<sup>2</sup> has been provided for all types of houses. This provision has been found to be an acceptable and workable minimum size that accommodates most household activities.

## Accessibility

All new dwellings should be able to be visited unassisted by disabled people as far as the entry to the dwelling. The 'Lifetime Homes' concept, will be adopted for an agreed percentage of the dwellings.

## Space Standards

Dwellings will be designed in accordance with the principals set out within the Technical Housing Standards- Nationally Described Space Standards to ensure the dwellings are of an appropriate size to create a viable and marketable development.

An element of affordable housing will be provided within the development in small clusters and could include social rented, shared ownership and low cost/reduced cost market housing.

## Daylight and Sunlight

Good natural light makes dwellings more attractive, pleasant and energy-efficient. The Housing layout will be designed to maximise daylight and sunlight to dwellings as far as possible, but not to the exclusion of other considerations, such as privacy or the achievement of an attractive streetscape.

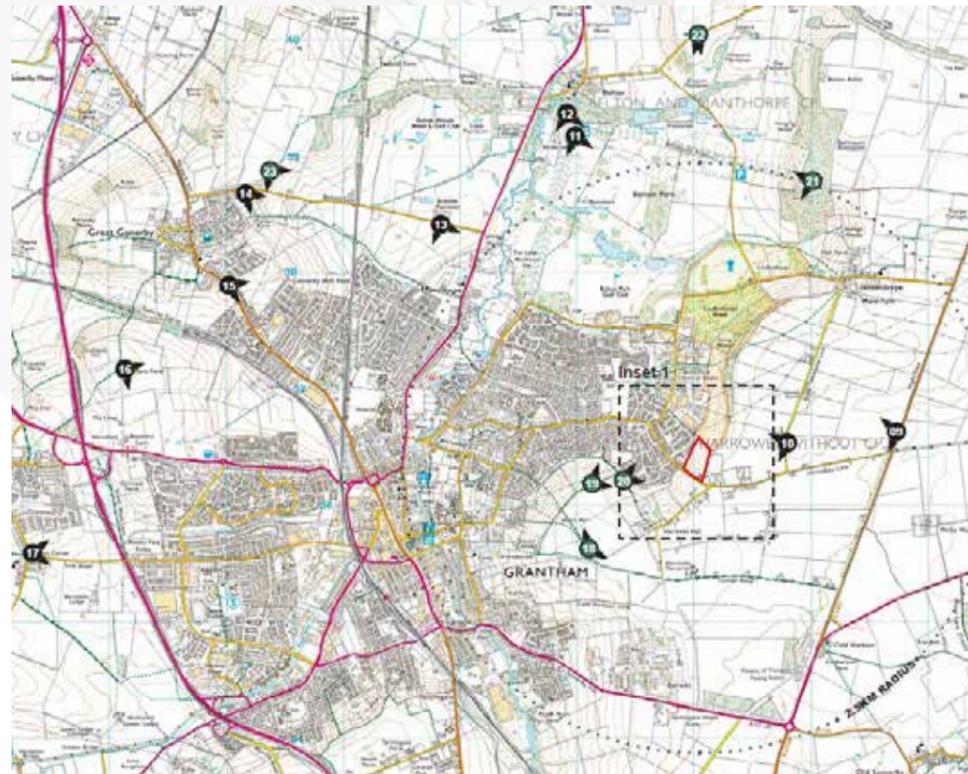
Dwellings have been positioned a minimum of 21m apart, where dwellings are on an elevated platform these distances will increase to compensate. As a rule adjoining properties will not obstruct views above 20o from a horizontal position.





# Heritage & Landscape Impact

The revised scheme has been amended to take account of the comments made in the recent planning appeal, concentrating development on the lower levels of the site where it was considered it doesn't contribute to important landscape character (Inspectors Report, para 14). The revised scheme has been prepared to contain the visual envelope as demonstrated in these long range views, where development has been positioned to work with the contours so as to sit neatly behind the rooftops of existing built form and not



### Views to and from Heritage Assets

The following images identifies the long range views to the site, the most significant of these is the designed landscape and setting of Belton House, some 3km north/northwest of the site.

The scheme has been revised so that there is no development punctuating the horizon when viewed from the roof of Belton House. Additionally, the Belton House Setting Study (2010) jointly commissioned by the National Trust and South Kesteven Council, shows that the proposed site is not within the zone of theoretical visibility as viewed from the roof of the house.

The site cannot be seen at all from Bellmount Tower and the reduction in built form means the site will not be experienced in views together with the Tower.

### Other Long Range Views

The other long range views are shown, many of which are glimpsed views from roads or public footpaths, with intervening vegetation. The revised scheme would retain the visual envelope with the development sitting neatly behind the rooftops of the existing built form and retaining the 'clearly defined rural hinterland' the Inspector refers to.

The site is not visible at all from the steps of Belton House



FIGURE 23: Viewpoint 11

The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



FIGURE 24: Viewpoint 12 - Existing Condition

There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



FIGURE 42: Viewpoint 21

The site is not visible at all from the steps of Belton House



The revised development is contained to the lower level of the slope and will not be visible from Belton House Roof



There is no intervisibility between the site and Bellmount Tower, even leaning out of the Tower windows as shown here



	Planning Application and Appeal (100 units)	Option 1 (50 units)	Option 2 (25 units)
Green Rim	The Inspector Stated that the site would transform the currently open and undeveloped landscape character of the site but would not break the ridgeline of the green rim. The proposed reduction in the number of dwellings to 75, would to some degree moderate this impact, reducing the degree of visual intrusion. Much of the value of the eastern escarpment	A further reduction in the number of dwellings and resultant stepping away from the highest point of the site would reduce the degree of visual intrusion.	Reducing the scale of development to 20 units means the majority of the site is located on the lowest level of the site with a significant proportion of the site undeveloped and/ or provision of open space.
Belton House and RPG Grade I Listed	The introduction of built development into a landscape seen in views from Belton House roof as almost pristine and undeveloped, would be of moderate harm the significance that Belton House and the RPG derive from this setting (para 30 Appeal Decision).	The reduced scheme of up to 50 units would mean that this development option would not be seen in views from Belton House roof.	The reduced scheme of up to 20 units would mean that this development option would not be seen in views from Belton House roof.
Bellmount Tower Grade II* Listed	There is no inter-visibility between the Tower and the site itself by virtue of the woodland and intervening curves in the escarpment. The development would however represent a small-scale change in the character of the wider context in which the Tower is experienced in some views (para 32 Appeal Decision).	The reduced scale of development, located in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptible change in which the Tower is experienced.	The reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptible change in which the Tower is experienced.
Harrowby Hall and Arch Grade II* Listed	These listed buildings are somewhat concealed by the fact that they are within a dip at the edge of the wider plateau and so “would not diminish the sense of rural approach and setting of these heritage assets to any great degree” (para 34 Appeal Decision).	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.	The reduced scale of development would again result in no impact to Harrowby Hall and Arch.
St Wulfram’s Church Grade I Listed	The development breaches the existing extent of built form on the eastern side of the town and includes development on the open green space above the settlement, impacting upon the rural setting of St Wulfram’s. However this to some degree was mitigated by the reduction in the scale of the proposal (para 36 Appeal Decision).	The reduced scale of development, located further in the lowest levels of the site would largely contain the existing built visual envelope and result in no perceptible change in which St Wulfram’s is experienced.	The reduced scale of development, located further in the lowest levels of the site would maintain the existing built visual envelope and result in no perceptible change in which St Wulfram’s is experienced.



PROPOSALS AT HARROWBY

# Landscape Benefits and Connectivity

As a development Harrowby Lane aims to create a safe and inclusive extension to the existing residential area. There are huge opportunities to improve the urban edge in this location to make better use of land and create improved overlooking to address some of the concerns regarding antisocial behaviour that have been reported through previous consultations.

Key to establishing a 'heart' or centre to the scheme is creating a space with a high enough frequency of use that it becomes a place to go & enjoy the passive/active company of people.

This has been achieved through various spatial planning strategies. Firstly, the 'heart' is linear; running through the centre of the site from north to south. This aims to make a space that is easily accessible to every resident within the scheme.

Secondly, the linear space responds to present & anticipated future walking routes (potential popular future activity amongst residents due to the site's location, views, & proximity to Alma Woods). This aims to attract future & existing residents into the space - for their everyday and recreational journeys - thus achieving high usage & safer environment.

Thirdly, shared space streets & narrowed portions of the loop road create numerous possibilities for residents to move from the loop road, on the periphery of the site, into and across the shared recreational space in the centre. From the outset, this achieves safer pedestrian movement due to the design's prioritising of people.

Finally, the design of the space itself achieves a sense of openness due to its proportions, and yet critically has a density of use that makes the 'heart' of the scheme lively and animated.

***There is also the opportunity to provide a more direct route to Alma Woods that is green, attractive links into the wider 'Reconnecting Grantham to its Heritage' project that the Woodland Trust and National Trust are promoting through Heritage Lottery funding.***

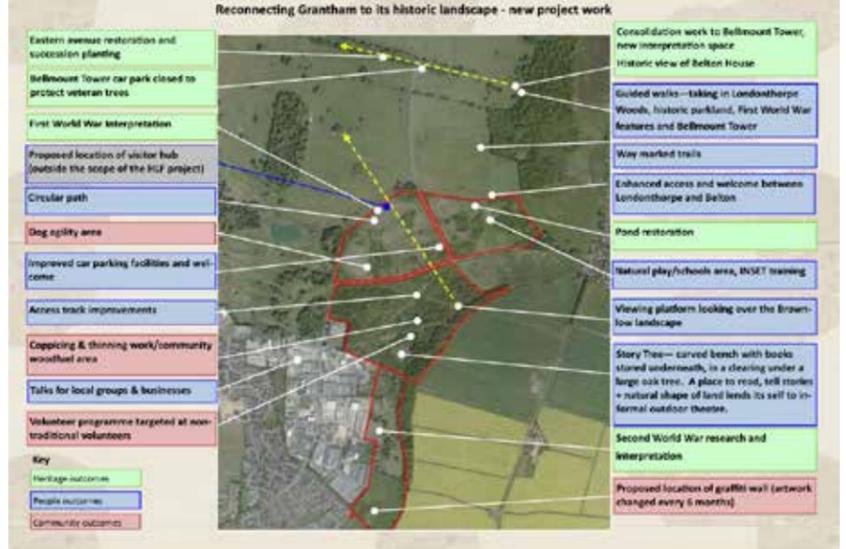
Initial conversations have been held with Ian Froggatt at the Woodland Trust regarding the creation of sustainable footpaths to the woods, along with tree planting should an application be approved.



The National Trust and the Woodland Trust, supported by National Lottery Players through the National Lottery Heritage Fund are working together to reconnect Grantham to its historic landscape. A key part of this is through interventions in Alma Park

Opportunity for improved connections, actively overlooked to reduce anti-social behaviour

Opportunity for funding to use 'left over' open space owned by SKDC





PROPOSALS AT HARROWBY

# Transport, Access and Parking

Curtins Consulting has played a key role in the evolution of the masterplan proposals to ensure that the transport, access and parking solutions to the site are deliverable. The site is highly sustainable offering a wide range of sustainable transport choices expected trip generation of the development is expected to be negligible on the local highway network.

## Access and Highways Layout

Site access will be located on Harrowby Lane and to consist of a simple priority junction with 2.4m x 43m visibility splay as set out in Manual for Streets. To accommodate the access junction and to reflect the definable change in characteristic of Harrowby Lane, the 30mph speed limit is to be extended past the site. This will also aid road safety.

The highway layout within the site has been developed to make vulnerable road users the priority through the use of shared surface areas, speed plateaus at all junctions and the use of off road paths throughout the site and linking to adjoining areas;

The site is permeable for pedestrians and cyclists allowing movement towards the Fifth Avenue area and towards the open country through rather than around the site.

## Parking Strategy

Many of the new dwellings will be served with on plot parking generally located to the side, front or rear of the dwelling. Parking spaces and garages will be sited so that there is sufficient room for users to enter and exit the vehicle. The distance from the car parking space to the home will be kept to a minimum and will be level or gently sloping. Disabled parking and cycling parking numbers will be provided in accordance with the appropriate standards.

## Traffic Generation

Traffic generation from the expected level of development would be x 2 way vehicle trips in the morning peak and x 2 way vehicle trips in the evening peak. This level of traffic generation would have no significant effect on local highway capacity.

## Servicing and Refuse Collection

The masterplan layout and highways design has been reviewed at a strategic level to ensure that servicing and refuse collection to the properties can be adequately achieved.



The site is permeable for pedestrians and cyclists and the design developed to make vulnerable road users a priority.

Car and cycle parking will predominantly be on plot. In some areas courtyard car parking is proposed in line with best practice design principles.

New priority junction off Harrowby Lane will serve the development in line with the design requirements set out within the Manual for Streets.





PROPOSALS AT HARROWBY

# Biodiversity

The development will be able to deliver significant ecological benefit to the wider area, providing additional habitat and foraging potential for local wildlife, as well as linkages between fragmented wildlife communities.

It is anticipated that the improvements to landscape infrastructure will make a significant contribution to local wildlife habitats through the following ways:

- greatly increase the acreage devoted to planting;
- diversify the existing monotone nature of unimproved grassland;
- introduce new habitat typologies, with the introduction of wildflower meadow, standing water and associated marginal planting;
- improve now degraded elements such as over-mature and damaged boundary tree and hedge planting;
- Use a planting matrix with species indigenous to the local area, improving biodiversity;
- Create wildlife corridors between fragmented habitats, linking for example Alma Wood with the roadside verge and established hedgerow of the unclassified road south-east of the site.



Improve site-wide biodiversity, creating wildlife corridors and connecting fragmented wildlife communities

Broaden the diversity of wildlife habitats with the introduction of standing water, marginal planting and wildflower meadow

Use a palette of local native meadow, herb, shrub and tree species to improve biodiversity and reinforce local landscape character





PROPOSALS AT HARROWBY

# Drainage

The development will be able to deliver a sustainable urban drainage system, providing a suitable onsite drainage scheme as well as providing betterment to the pre-existing

## Drainage

A revised drainage strategy was prepared by Curtins in response to the LLFA comments and whilst the final drainage solution will be determined at a later stage, Lincolnshire County Council's Environment and Economy Directorate (LCC) have agreed to the principle of the drainage scheme as proposed.

The revised masterplan layout has been developed to ensure that the amount of storage can still be accommodated on site.

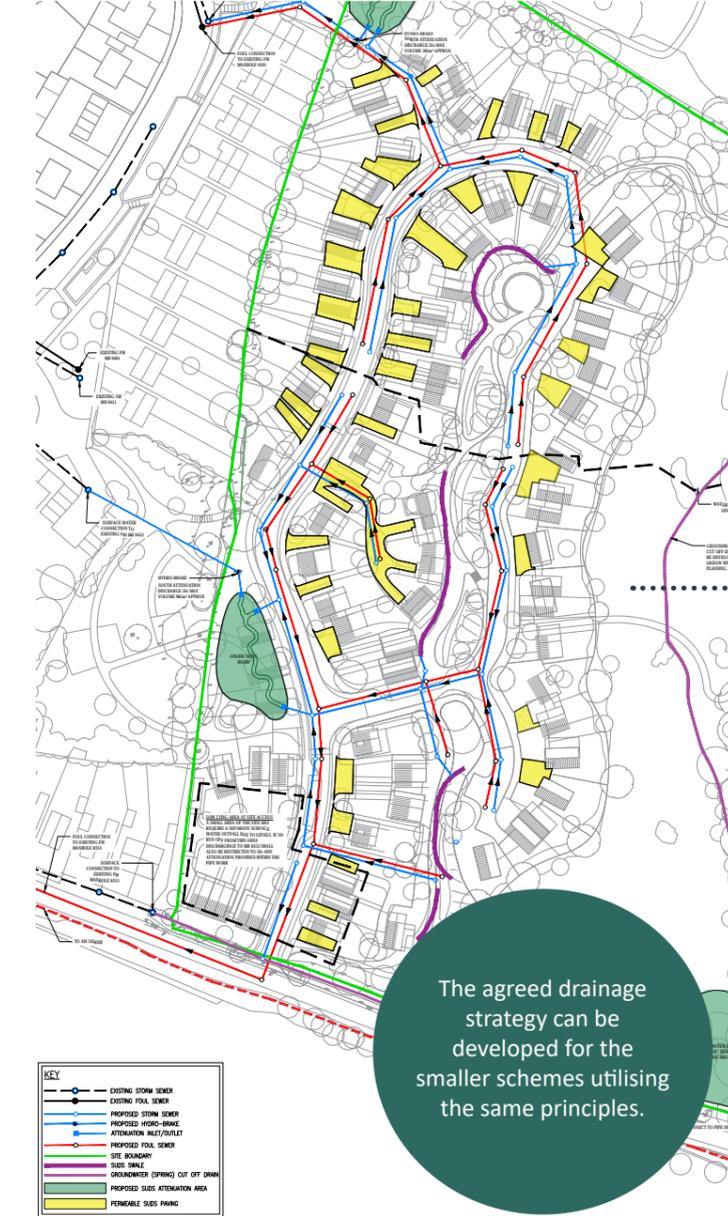
## Surface Water Design

Under the concept design, the surface water runoff and roofline drainage from the proposed development could discharge as follows:

- Provision of permeable driveways and swales as part of a sustainable drainage system (SuDS).
- Discharge rates can be restricted to Greenfield runoff rates of 5l/s/ha;
- Flow rates to be provided by installed flow restriction devices including SuDS basins and a cut off land drain across the eastern proportion of the site.

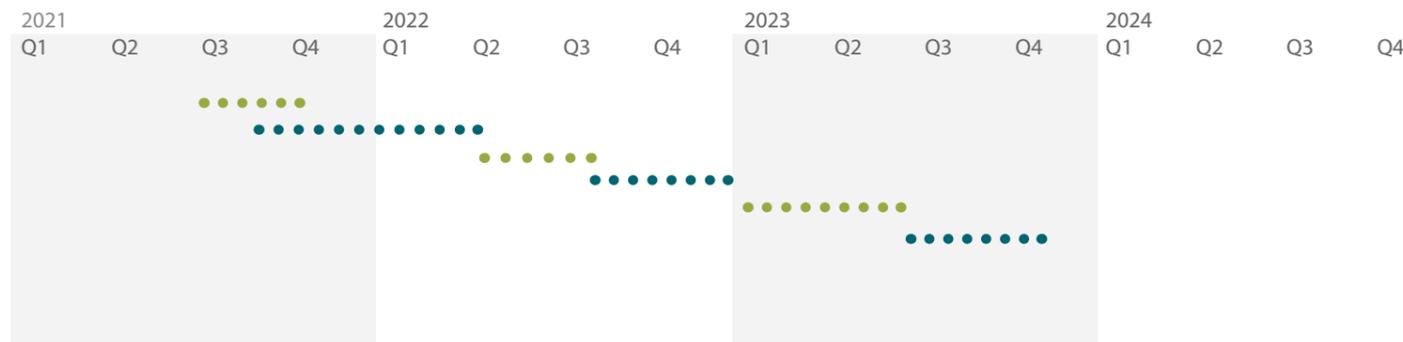
## Foul Water Drainage

There is no existing foul water drainage on site. The development is proposed to connect to public sewers in the vicinity of the site at Harrowby Lane.



# Next Steps

## A short-term deliverable site



- Local Plan Preferred Options
- Outline Planning Application
- Appoint Builder / Contractor
- Reserved Matters Application
- Start Infrastructure Works
- Finalise Development

### CONCLUSIONS

This vision document sets out how development can be delivered on the site which, following evaluation clearly represents an excellent candidate for allocation within the current planning context for the following reasons:

- » The site is available for development and can make a contribution of the district's short term land supply.
- » The site provides an extension of existing development, providing the opportunity to better integrate the existing housing to the countryside.
- » The site promotes quality housing that will meet the needs of the area and local residents.
- » Whilst there are challenges, these can be overcome through careful design and mitigation to provide a development that is a true asset to Grantham.

In short, the site has potential to deliver a well integrated, sustainable, mixed and positive residential addition to Grantham. We look therefore look forward to working with SKDC further to deliver development on the site.

### DELIVERY

In terms of delivery, an indicative programme for the development of the site is provided below. This shows that the intention is to submit and progress the necessary planning permissions in tandem with the Local Plan preparation process. The landowner has current relationships with regional and national contractors who will be appointed once the principle of development is established through an outline planning application.

The roads and infrastructure would be installed followed by a phased development. The landowner is committed to the short-term delivery of the site with the intention that the site could make an early contribution to the housing numbers required by the District.

### INVOLVEMENT

The proposal from the outset has been subject to meaningful engagement with the Council and prepared in the context of good practice guidance contained with the 2011 Localism Act, 2012 National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG).

It is recognised that overall community input is key and that future matters of the approach to consultation will look to be agreed with SKDC. The design of the proposals will be discussed with key stakeholders including the Council, Grantham Civic Society, Londonthorpe and Harrowby Without Parish Council and local residents and we look forward to working with them over the coming years.

### EVIDENCE BASE

Overall, it is well established that development plans need to be; positively prepared, justified, effective and consistent with national policy. Further, in order to include sites within SKDC land supply the sites need to be deliverable and developable (paragraph 47, footnote 11).

Following on from the call for sites submission, this vision document can be seen as the first step towards demonstrating and supporting the council in meeting the above criteria. It has sought to understand the traffic and access impact, ground conditions, landscape and heritage sensitivities and drainage implications alongside and to inform the detailed masterplan. Work to date therefore that the site is deliverable and developable following a masterplanning exercise to determine site capacity. The intention to build on this document effectively building the site's evidence base, guided future discussions with future iterations produced as required.



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# Harrowby Lane Grantham Vision Document

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SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title	Mr	
First Name	Nigel	
Last Name	Jones	
Organisation	Barrowby Neighbourhood Plan Group	
Address	[REDACTED]	
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	23/11/20

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
<b>Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>X</b>
<b>If not please provide details.</b>					
<p>The vision fails to take account of linked/complementary events, strategies and structures – e.g. the downgrading of A&amp;E at Grantham Hospital, the strain on and growing failure of primary health provision, the visible decline of Grantham town as a viable retail centre, the inability of utilities and services to deliver services or plan for the future, the failure to invest in transport infrastructure etc.</p> <p>Yours is a partial vision that looks good on paper but will not deliver benefit for existing residents – indeed will for it many deliver disbenefit.</p> <p>For whom, and why, are the Council doing this? Please ask yourselves this fundamental question.</p>					
<b>Q1b – The Vision</b>					
<b>Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?</b>					
<b>Yes</b>		<b>No</b>	<b>X</b>	<b>Unsure</b>	
<b>If not please provide details.</b>					
<p>There are many worthy statements with lots of motherhood &amp; apple pie – but also increased traffic and pollution and, sadly, very little in the way of proposals that will make a positive difference.</p>					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
<b>Do you agree that the Objectives should remain the same for the new plan?</b>					
<b>Yes</b>		<b>No</b>		<b>Unsure</b>	<b>x</b>
<b>If not please provide details.</b>					
<p>Lots of motherhood and apple pie statements that are often essentially meaningless – what about the quality of life of residents? What do the people affected by this want? When have you asked them? Have their views changed? Do you take any notice of what people say?</p>					

How are you going to save, let alone 'strengthen' the viability of town centres? By promoting out of town retail centres? Good words – but what are you actually going to do?

**7. Proposal 3 – Policies not proposed to be changed significantly**

**Q3 – Policies not proposed to be changed significantly**

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?

Yes		No		Unsure	X
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If not please provide details.

Do you have any evidence as to the actual impact of policies and statements? Our experience is that they carry no weight and SKDC Officers simply ignore them when it suits them to, which in turn breeds distrust and cynicism.

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes		No		Unsure	X
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If not please provide details

There is no point in having any long term plan if you review it within 1 year of establishing its predecessor. No stability.

**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not, please provide details of what changes you think should be made.

The settlement hierarchy is too rigid and (e.g.) underplays the role that smaller villages or greenfield sites might make – and might welcome, if it led to retail or other new facilities.

By definition it risks overplaying the roles larger villages might have to play and may lead, as we have seen in Barrowby, to inappropriate and disproportionate development that may constitute an existential threat to the existing village. I repeat – who are you doing this for?

Certainly not the residents of villages such as Barrowby, who have grave misgivings about the current development proposals and allocations, let alone any further allocations from this

process. Their views have been consistently and continually disregarded and ignored in favour of wider considerations and landowner benefit.

The concentration on Grantham is unbalanced and, in parallel with the uncoordinated approach of others (e.g. reducing healthcare provision, failure to invest in infrastructure and utilities etc) risks damaging Grantham and the lives of its residents, presumably to protect Stamford and other 'favoured' locations. This policy is simply unbalanced.

The policies take no account of existing allocations and the impact they will have on communities.

#### Q5b – Settlement Hierarchy Methodology

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not, please provide details of what changes you think should be made.

The methodology is inappropriate and, in the case of Barrowby, failed to take into account proximity to Grantham and the need for separation. You need to develop a much more sophisticated approach that factors in local characteristics and issues.

The Consumer Data Research Centre's analysis of how healthy areas of the UK are, measure primarily by proximity to services, does not score Barrowby well (source Lincolnshire Echo website, 23/11/20). This suggests that your methodology for Large Villages is flawed and too crude to be reliable. We urge you to consult locally and adopt a more nuanced approach in conjunction with local communities.

See also answer in 5a above re small villages.

#### Q5c – New Settlement

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If so, please outline any suitable and deliverable proposals.

For SKDC to agree to take on the responsibility for a proportion of Cambridge and Peterborough's growth needs without planning for any new community is flawed and places too much strain on a small number of towns and large villages. Given the land available compared to other areas of the UK, this is a fundamental weakness of the approach.

You need to find a better way of considering the impact on the people and communities affected by any growth proposals.

## 10. Proposal 6 – Housing Need and Requirement

### Q6 – Housing Need and Requirement

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not, what evidence do you have to justify an alternative need and requirement?

This number is predicated on SKDC taking on a proportion of Cambridge and Peterborough's requirements. Why? For whom are you doing this? Why are we expected to do this?

In the absence of any clear evidence as to growth in local demand, local employment, improvement in transport infrastructure, utilities and service provision etc, the number should be reviewed and reduced to a level consistent with maintaining the standard of life for residents.

As well as absolute numbers, you should focus on the quality of houses and their suitability to be 'in keeping' with the locations where they are proposed. This is a major current weakness where developers are allowed to ignore their localities and build effectively what they like.

## 11. Proposal 7 – Distribution of Growth

### Q7a – Focus of Housing Growth on Grantham

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

Grantham should not take on disproportionate allocations – 53% (or even 50%) is disproportionate, especially given the failure to make parallel improvements in (e.g.) infrastructure.

All Towns and Villages should share the burden more or less equally, and Towns and Villages without current allocations should be the primary focus of new allocations.

### Q7b – Stamford, Bourne and The Deepings

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details and any alternative proposals.

See above

### Q7c – Larger Villages

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes		No		Unsure	X
-----	--	----	--	--------	---

If not, please provide details and any alternative proposals.

Only as part of a fairer strategy as above – not simply for administrative convenience. The needs of the village, not the district or the SKDC area nor Cambridge or Peterborough – should be paramount.

Please see above for comments about the Larger Village definition methodology.

In Barrowby, where there is little need for affordable housing, SKDC have allowed a development that will be inappropriate and out of keeping with the village to enable its wider affordable and social housing targets to be met. I repeat – for whom are you doing this?

### Q7d – Other Settlements

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

All settlements should contribute to some degree on a planned basis – not just as ‘windfall’.

### Q7e – Consideration of the Market and Deliverability\*

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	X	No		Unsure	
-----	---	----	--	--------	--

Please provide details

Market capacity should not be the sole driver. You should also consider the impact on people’s lives, and quality of lives – the people who live in SKDC’s area rather than those from Peterborough or Cambridge.

Pursuing a strategy to provide homes for people dependent on economic growth 50-80 miles away for employment is not a responsible or sustainable strategy. How have SKDC evaluated this?

\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as "...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

**Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy**

**Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

--

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	x	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes		No	X	Unsure	
-----	--	----	---	--------	--

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

See above re encouraging transport between (e.g.) Grantham and where employment is likely to be found.

Home should be near where employment is, with sustainable transport links wherever possible.

#### 15. Proposal 11 – Energy Performance Standards

##### Q11a Energy Performance Standards in Residential Development

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

##### Q11b – Energy Performance Standards in Non-Residential Development

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

Please give details.

##### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

#### 16. Proposal 12 – Need for Caravan Accommodation

##### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	x	Unsure	
-----	--	----	---	--------	--

Please give details

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**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	x	No		Unsure	
-----	---	----	--	--------	--

Please give details

Parking should be off road and not interfere with cycling or walking provision.
---------------------------------------------------------------------------------

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**



# SOUTH KESTEVEN LOCAL PLAN REVIEW

ISSUES AND OPTIONS (REGULATION 18) CONSULTATION

CONSULTATION RESPONSE ON BEHALF OF MR PJSR HILL AND PIKERACE LIMITED

WOOLFOX – A NEW MARKET TOWN (WOOLFOX)

PROJECT REF.: P/300/H31

NOVEMBER 2020





Established in 1989, East Midlands property experts Andrew Granger & Co. are a wide multi-disciplinary consultancy featuring residential sales and lettings, commercial, rural and professional services.

Offering a high quality and affordable service, Andrew Granger & Co. have the expertise and experience to assist with Planning and Development queries across the Midlands and further afield.

Andrew Granger & Co is a trading name of Andrew Granger & Co Ltd; Reg. No. 09298477.

Registered office: Phoenix House, 52 High Street, Market Harborough, Leicestershire, LE16 7AF. VAT No.: 638 6788 76

### Market Harborough

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Project Client:**

MR PJSR HILL AND PIKERACE LIMITED

**Project Location:**

WOOLFOX – A NEW TOWN  
GREAT NORTH ROAD  
RUTLAND  
LE15 7QT

## Table of Contents

1. Executive Summary.....	4
2. Introduction .....	6
3. Planning Policy Context.....	8
4. Site & Development Potential .....	11
5. Comments on the South Kesteven Local Plan Review Issues & Options Consultation .....	14
6. Conclusions .....	31
<b>Appendix 1: DMU Expression of Interest .....</b>	<b>33</b>
<b>Appendix 2: Empingham Medical Centre Expression of Interest .....</b>	<b>35</b>
<b>Appendix 3: Proposed Development Trajectory .....</b>	<b>37</b>
<b>Appendix 4: Applegreen Expression of Interest.....</b>	<b>41</b>
<b>Appendix 5: Pears Property Group Expression of Interest .....</b>	<b>43</b>

## 1. Executive Summary

- 1.1. This Statement provides a written submission to the South Kesteven Local Plan Review: Issues and Options (Regulation 18) Consultation and is framed in the context of the requirement for the Local Plan Review to be considered legally compliant and sound. In particular, Section 33A of the Planning and Compulsory Purchase Act 2004, requires authorities to “engage, constructively actively and on an ongoing basis” in the preparation of Local Plans, in this regard, the representations made within this Statement would be consistent with this legal obligation. This document should be read alongside the further supporting documentation, which was prepared as part of the formal response to the Rutland Local Plan Regulation 19 Consultation, which sets out detailed evidence on the suitability and deliverability credentials of the proposed development at Woolfox. Further supporting technical evidence is also available upon request.
- 1.2. We contend that the Local Plan Review should plan positively by seeking to deliver the higher Local Housing Need figure, that would be derived from the revised Standard Method, of 839 dwellings per annum, rather than progressing with the lower LHN established by the current Standard Method. The direction of Government policy clearly indicates that the housing need for the District will only increase beyond the current identified needs and, as such, it would be appropriate to positively prepare for the uplift in housing need now.
- 1.3. In this context, we are concerned whether there is sufficient capacity of suitable sites in the identified Market Towns (Grantham, Stamford, Bourne and The Deepings) to accommodate the significant uplift in housing that would be required to 2041. It is our view that the allocation of additional sites within these settlements may not be sustained by the market and, in any event, would result in significant adverse impacts on the settlements’ heritage and landscape assets.
- 1.4. Consequently, we propose that the Council should pursue an amended spatial development strategy, which is capable of delivering the significant uplift in housing need across the District. In this respect, we promote the allocation of land at Woolfox for a new settlement comprising of a minimum of 7,500 new homes, a retirement village, employment land, a mixed-use town centre and all other associated infrastructure and open space requirements, which would assist in meeting the development needs of the District, and the wider sub-region, in the short, medium and longer-term. The allocation of the site could be achieved through an amendment to the identified Settlement Hierarchy, and the position of Woolfox within the hierarchy should be reflective of the scale of development, and the level of services, that would be delivered during the plan period. In this regard, it is our view that Woolfox should be appropriately identified alongside Stamford, Bourne and The Deepings as a Market Town.
- 1.5. Finally, it is our view that the allocation of land at Woolfox, for a new settlement, would complement the Council’s strategic economic development agenda, which seeks to position Grantham as a sub-regional centre. In this regard, Woolfox would assist in the creation of a market town’s alliance that would form a stronger, collective sub-regional

economic cluster of towns that, together, would drive-up standard of living, education, leisure and recreation in the region.

## 2. Introduction

- 2.1. Andrew Granger & Co. Ltd specialises in the promotion of strategic land for residential development and commercial uses. As a company, we are heavily involved in the promotion of clients' land through various Local Plan representations throughout the country, and we also have vast experience in contributing to the Neighbourhood Plan process.
- 2.2. On behalf of Mr PJSR Hill and Pikerace Limited ("the Landowner"), we are seeking to work with Rutland County Council and the other authorities of the Peterborough Housing Market Area (including South Kesteven District Council, South Holland District Council and Peterborough City Council) in promoting the land at Woolfox ("the Site") for formal allocation for a proposed new sub-regional settlement, based on Garden Community principles.
- 2.3. This document provides a written submission to the South Kesteven Local Plan Review: Issues and Options (Regulation 18) consultation and is framed in the context of the requirement for the Local Plan Review to be considered legally compliant and sound. The tests of soundness are set out at Paragraph 35 of the National Planning Policy Framework [NPPF] ("the Framework") (Adopted February 2019), which states that for a development plan to be considered sound it must be:
  - **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need for neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
  - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
  - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by a Statement of Common Ground; and
  - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework
- 2.4. In addition, this Statement should be read alongside the following supporting documents, which has recently been prepared as part of the formal consultation response to the Rutland Local Plan 2018-2036 Regulation 19 Consultation. The documentation provides additional detail on the Woolfox proposals, including evidence to demonstrate the Site's suitability for development and its deliverability credentials:
  - WF1: Vision Document & Master Plan (LDA Design)
  - WF4: Independent Sustainability Appraisal (Turley)
  - WF6: Viability Statement (Turley)

- WF7: Costs Plan Report (Tustain Associates)
- WF9: Initial Transport Appraisal (RPS Group)
- WF11: Preliminary Flood Risk Appraisal (RPS Group)
- WF12: Utilities Technical Note (RPS Group)
- WF13: Energy Strategy (Turley)
- WF14: Minerals Resource Assessment (Hughes Craven)
- WF15: Landscape and Visual Technical Note (LDA Design)
- WF16: Previously Developed Technical Note (LDA Design)

2.5. Further technical evidence relating to Agriculture, Air Quality, Arboriculture, Ecology, Geo-Environmental Conditions, Heritage, Landownership and Noise is available upon request.

### 3. Planning Policy Context

- 3.1. Rutland County Council are currently in the process of preparing a new Local Plan, which will replace the current Local Plan: Core Strategy (Adopted July 2011) and the Local Plan: Site Allocations and Policies DPD (Adopted October 2014). The new Local Plan will set out the County's development strategy, policies and proposals, including site allocations, which will guide land use and development in the County up to 2036.
- 3.2. The County Council have undertaken four stages of public consultation to date, as follows:
  - Issues and Options (Regulation 18): January – February 2016
  - Consultation Draft Local Plan (Regulation 18): July – September 2017
  - Focused Changes and Additional Sites (Regulation 18): August – September 2018
  - Publication Draft (Pre-Submission Draft) (Regulation 19): August – November 2020
- 3.3. During the initial two stages of public consultation, Rutland County Council were proposing to continue with the spatial development strategy contained within the adopted Local Plan: Core Strategy, namely a hierarchical distribution of development whereby the majority of development was to be directed towards two principal settlements (Oakham and Uppingham) with the remainder to be distributed between other, smaller sustainable villages.
- 3.4. However, in November 2016, the Ministry of Defence [MOD] confirmed that St. George's Barracks, North Luffenham would be surplus to operational requirements and would be available for redevelopment under the MOD's "Better Defence Estate Initiative". In August 2017, Rutland County Council entered into a Memorandum of Understanding [MoU] with the MOD's Defence Infrastructure Organisation [DIO] to pursue the redevelopment of the site.
- 3.5. Thus, the Focused Changes and Additional Sites (Regulation 18) Local Plan consultation, proposed a new spatial strategy for Rutland. This spatial strategy included the identification of St. George's Barracks as a proposed allocation for a new Garden Community comprising between 1,500 and 3,000 new dwellings, including employment land, and education, health and community facilities. The Focused Changes and Additional Consultation represented the first opportunity for alternative sites for New Settlements to be submitted to Rutland County Council for consideration. The Landowners for Woolfox duly prepared a formal submission to the Focused Changes consultation promoting the site as an alternative option for a proposed new settlement.
- 3.6. Following the representations in September 2018, Rutland County Council undertook a limited assessment of Woolfox, and concluded that the site did not then represent a realistic alternative to St. George's Barracks. This assessment was undertaken by independent consultants PTP and presented to Cabinet in December 2019. Paragraph 6.1 of Appendix 2

to the Cabinet Report (23 December 2019)<sup>1</sup> provided the following conclusions and recommendations:

*“Current National Planning Policy Guidance states that any reasonable alternatives must be realistic and deliverable within the plan period. This factor is a significant consideration in the assessments of both proposals (Woolfox and St. George’s Barracks). Based on the available evidence, the proposals for Woolfox have been assessed as unviable and not deliverable. Proposals for St. George’s are viable and would be deliverable with the benefit of Housing Investment [sic] Funding [HIF]. On this basis, it is recommended that the proposals for Woolfox are not taken forward for consideration within this review of the Local Plan as the evidence does not demonstrate that the proposals for this site are deliverable and viable. Officers consider that the available evidence and assessment demonstrate that, given the positive decision on HIF, it is appropriate to consider the proposals for St. George’s to be deliverable and so would form an appropriate location for a new settlement, if this is agreed as an appropriate amendment to the spatial strategy.”*

- 3.7. The recently completed Regulation 19 (Pre-Submission) Rutland Local Plan consultation proposes the formal allocation of St. George’s Barracks, North Luffenham for a new settlement comprising 2,215 new homes and at least 14ha of employment land, as well as associated education, health and community facilities.
- 3.8. It should be noted that Landowners consider that the process for the assessment, selection and rejection of reasonable alternatives for a new settlement in Rutland was flawed, unsound and in breach of the SEA Regulations. Appropriate representations have been submitted to the Regulation 19 Consultation formally objecting to the proposed allocation of St. George’s Barracks as a prospective new community. The submission advocated reducing the allocation of the site to a level which can be considered reasonably deliverable in the context of the available evidence, and promoted Woolfox as a deliverable, reasonable alternative for allocation as a new settlement within the Plan. The Regulation 19 submission was supplemented with the additional technical information referenced above, which demonstrates the suitability, deliverability and viability of Woolfox.
- 3.9. The Rutland Local Plan 2018-2036 is now expected to be submitted to the Secretary of State for Independent Examination, which is likely to take place in 2021. The Landowners are committed to pursuing an allocation at Woolfox through this process.
- 3.10. Furthermore, for the reasons detailed elsewhere within this submission and the supporting information, it is considered that Woolfox represents a sub-regional development opportunity that would assist in meeting the development requirements of the wider region; in particular, the identified needs of the Strategic Housing Market Area, which includes South Kesteven, South Holland and Peterborough, in addition to Rutland. As such, we are seeking to engage with the local planning authorities within the HMA regarding the potential allocation of the site within their respective Local Plans.

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<sup>1</sup> <https://rutlandcounty.moderngov.co.uk/documents/s16931/Appendix%20%20-%20Distribution%20of%20development.pdf>

3.11. In addition to the above, Woolfox was also the subject of a submission to Government in November 2018 through the Garden Communities Prospectus. In this respect, MHCLG have elected not to progress the Site for formal allocation as a potential Garden Community due to the absence of 'local' support, as evidenced by the above Rutland Local Plan context.

## 4. Site & Development Potential

- 4.1. The proposed development site is located directly to the east of, and with access to, the A1 in Rutland. The site is also strategically well placed between the existing market towns of Oakham (approx. 9.6 miles to the west), Stamford (approx. 6.6 miles to the south), Grantham (approx. 16.6 miles to the north) and Bourne (approx. 12.3 miles to the east) and is known as Woolfox. The Site lies within the administrative area of Rutland County Council, however, it is circa 3.7 miles from the boundary with the adjoining South Kesteven District.
- 4.2. The Site extends to approximately 503 hectares (1,242 acres) and comprises a former Airfield and agricultural land, as outlined red in Figure 1 below. It is understood that the former RAF Airfield on the site was constructed in 1940 and was used through the Second World War for training and live missions. After the war, the airfield continued to be used for training until 1953. Part of the airfield adjacent to the A1 was subsequently used for Bloodhound I missiles until 1964, and the site was sold by the MOD, and purchased by the current landowner family in 1966. A number of derelict buildings or evident remains of former buildings, along with extensive hard surfacing from the former runways, taxiways, roads and tracks remain present on the site. It is considered that circa 34.53 hectares of the site is defined as Previously Developed Land as per the definition in the Framework. Further details and mapping of the site's historical use are available in WF16: Previously Developed Land Technical Note prepared by LDA Design.



Figure 1: Site Location Plan

4.3. The Site benefits from being in single family ownership, Pikerace Limited is a Hill Family-owned company, and has been successful in securing Master Developer support in progressing the proposal. Formal Heads of Terms have been agreed with the Master Developer who will be responsible for maintaining an overview of the provision of infrastructure, providing serviced land parcels for housebuilders and ensuring that the quality and deliverability of Woolfox is guaranteed.

4.4. Woolfox represents a proposed new settlement which would provide a strategic level of residential and employment development, alongside the range of services and facilities that would be required to create and maintain an inclusive and sustainable new community. In short, the proposed new settlement would comprise of the following:

- A minimum of 7,500 new homes
- A retirement village comprising up to 200 independent living apartments and close care accommodation ('Care Community')
- Employment land
- A mixed use town centre with a market square
- Mixed use local centres within residential neighbourhoods
- Primary, Secondary and Tertiary education
- Retail, healthcare, community and leisure facilities
- Parks and Open Space
- Renewable Energy Generation, including Solar Farm and Anaerobic Digestion Plant
- A new grade-separated junction with the A1; and
- A Trunk Road Service Area ('TRSA')

4.5. The development of Woolfox is anticipated to come forward in four key phases as follows:

- **Phase 1** will be accessed via the local service road which runs alongside the A1. It will include a Primary School, Local Centre, Healthcare and Community facilities, and approximately 750 new homes. A temporary solar farm will be located in the far east of the Site, and to the south of Osbonall Wood.
- **Phase 2** will include the grade-separated junction with the A1, the new trunk road service area, employment development adjacent to the A1, the Secondary School and approximately 1,750 new homes. Initial elements of the retirement village and town centre would also begin to be delivered.

- **Phase 3** would conclude the development on the former airfield. It will include a second Primary School, the remainder of the Town Centre and Retirement Village, and approximately 3,000 new homes
- **Phase 4** would complete the development of the site, comprising 2,000 new homes and a third Primary School. Delivery of this phase would progress from west to east to allow for the prior extraction of minerals to the east of Osbonall Wood. The temporary solar farm would be removed with renewable energy being provided by rooftop PV panels, low carbon heating systems and by the AD plant.

4.6. Further detailed information regarding the vision and guiding principles of the Woolfox proposals are contained within WF1: Vision Statement and Master Plan, prepared by LDA Design.

## 5. Comments on the South Kesteven Local Plan Review Issues & Options Consultation

5.1. On behalf of our Landowner Clients, Mr PSJR Hill and Pikerace Limited, we wish to make the following observations on the South Kesteven Local Plan Review: Issues & Options Consultation Document.

**Question 2 (Objectives): Do you agree that the objectives should remain the same for the new Plan? If not, please provide details.**

5.2. We would agree that the objectives contained within the current South Kesteven Local Plan (Adopted January 2020) remain broadly appropriate for continuation within the Local Plan Review. However, this is subject to any necessary amendments that may be required to the Objectives once the proposed strategy, to address the specific issues to be considered within the Plan Review, has been finalised. As set out within the consultation document, an early review of the adopted Local Plan is required in order to consider the implications of the increased housing needs resulting from the use of the Standard Method, the need to allocate sufficient land to meet gypsies and travellers accommodation needs, the requirement to update the Employment Land Study, and the Council's declaration of a climate emergency.

5.3. In respect of the current Objectives for the Plan Review, as set out in Proposal 2 of the consultation document, it is our view that the proposed development at Woolfox would accord entirely with the Council's identified objectives.

5.4. In particular, Objective 2 of the Plan seeks *"To develop a strong, successful and sustainable economy that provides a sufficient number and wide range of employment opportunities for local people"*. Specifically, the plan aspires to providing more, better quality jobs (i.e. opportunities in knowledge-rich businesses and higher skilled roles) and improving the skill levels of the working population within the District. In relation to this Objective, it should be noted that Woolfox has been successful in securing a formal Expression of Interest from De Montfort University (**Appendix 1**), who have been involved in developing the proposals for site and have identified the potential opportunity to provide lifelong learning facilities within the new settlement. It is considered that the provision of these facilities could assist with delivering the objectives for South Kesteven, especially in relation to developing the skill levels of the resident working population.

5.5. Similarly, Woolfox also offers the opportunity to complement the employment growth identified for Grantham, particularly in respect of providing knowledge-rich, higher skill level jobs. In view of the presence of existing businesses at Woolfox Depot and the other commercial development opportunities proposed as part of the scheme, it is considered that there is an opportunity for businesses to align with De Montfort University's lifelong learning strategy, to create additional research and development programmes. The development of these programmes could complement the proposed development in the District's identified growth sectors, as recognised in the South Kesteven Economic Development Strategy and by the Greater Lincolnshire Local Enterprise Partnership [GLLEP].

- 5.6. Objective 7 of the Plan seeks “to make effective use of land by maximising the amount of development on appropriate previously developed sites and on sites in locations which reduce the need to travel”. As detailed previously, Woolfox comprises a former WWII airfield alongside agricultural land, and 34.53ha of the Site has been assessed as falling within the definition of Previously Developed Land, as set out within the Framework. The proposed phasing of scheme would result in development beginning in the south of the site, utilising the Previously Developed Land first, before moving north onto the greenfield areas of the land. Furthermore, the vision for Woolfox is to establish a comprehensive mixed-use community that would endeavour to be self-sufficient and, therefore, providing opportunities to live, work and recreate within a single location and, as such, reducing the need to travel.
- 5.7. In respect of Objective 9 of the Local Plan Review, which seeks to meet the identified development needs of the District whilst safeguarding the best and most versatile agricultural land, the vision for Woolfox is entirely consistent with this objective. The scheme would deliver a sub-regional new town, based upon the Garden Communities principles, and, as such, would include a full range of development land uses, including housing, employment, retail, leisure and open space, alongside all other infrastructure requirements. The proposed settlement would seek to complement the identified growth agenda for the District, and the wider sub-region, rather than diluting or competing with the proposals. In addition, initial investigations, completed by Kernon Countryside Consultants in March 2019, confirmed that the site is Grade 3 agricultural land. Furthermore, the assessment also identified that the Natural England BMV Maps (2017) shows the site to comprise low-moderate likelihood of forming Best and Most Versatile Land. Consequently, it is considered that development of the site would fully accord with Objective 9 of the Local Plan Review.
- 5.8. Objective 10 of the Local Plan Review aspires to ensure that Plan provides development to meet a variety of housing needs, including affordable and local housing needs within the District. As detailed above, Woolfox has been designed to provide a wide range of housing types, sizes and opportunities to meet a plethora of housing needs; this includes providing opportunity for self-build housing, a significant proportion (30%) affordable housing including a mix of tenure and ownership models, and market housing of all types and sizes. The proposals also make provision for 200 independent living apartments and close care accommodation as part of a retirement/care community, to enable future residents to have access to a range of housing models to meet their changing needs across their lifetime.
- 5.9. Furthermore, in relation to Objective 11 of the Plan, which supports new and existing community infrastructure, and contributing to improving the overall health and well-being of local residents, document WF1: Vision Statement and Master Plan, prepared by LDA Design, sets out in detail the extent of community leisure and education facilities that are to be provided as part of the proposed new settlement at Woolfox. This includes the provision of Primary, Secondary and Tertiary education opportunities, a mixed-use town centre, and individual neighbourhood centres within the various residential neighbourhoods.
- 5.10. In addition, it should be noted that a formal Expression of Interest has been received from Empingham Medical Centre (**Appendix 2**) in relation to the potential for providing on-site

health care facilities. Likewise, it is hoped that the cluster of market towns, that would be strengthened by the addition of a new settlement at Woolfox, may be sufficient to create the necessary critical mass to support the re-introduction of other major medical facilities, such as a hospital, within the local area.

- 5.11. Notwithstanding the aforementioned built facilities, the scheme would also provide benefits to the health and well-being of residents through the provision of enhanced access to the countryside and woodlands, that would result from opening the site up to development. Similarly, the new community would also provide a variety of green infrastructure and open space typologies, including the re-interpretation of the former Ash Wood as a new park in the Town Centre.
- 5.12. The submitted proposals have been assessed as being viable and, therefore, capable of delivering all of the necessary on-site and off-site infrastructure improvements to support the development of the new settlement, whilst also making the appropriate CIL payments to assist in funding Rutland County Council's wider infrastructure requirements.
- 5.13. Objective 12 of the Plan aspires "*to protect and promote the enhancement, sensitive use and management of the District's natural, historic, cultural assets, green infrastructure and the built environment through good design...*". As set out above, the supporting document (WF1: Vision Statement & Master Plan) sets out in detail the manner in which Woolfox has been designed to fully accord with the above objective. In short, the proposals have been prepared through clear consideration of the detailed and proportionate evidence base that has been collated, to ensure that the various technical opportunities and constraints have been incorporated into the scheme at the earliest opportunity. For example, the scheme has been designed to protect and enhance the biodiversity assets of the site in order to contribute to an overall biodiversity net gain. Similarly, the site's landscape character has been assessed in principle in WF15: Landscape and Visual Technical Note, prepared by LDA Design, and the conclusions of this work have fed directly into the Master Plan through the provision of landscape buffers and the enhancement of areas of distinct woodland, to ensure that the scheme would assimilate with the local landscape alongside creating an innovative and attractive character that is distinct but complementary to the local setting.
- 5.14. Finally, in respect of Objective 14, which seeks "*to promote the prudent use of finite natural resources and the positive use of renewable resources*", a detailed energy strategy has been designed for Woolfox (WF13: Energy Strategy) which sets out how masterplan-scale and building-integrated approaches to meeting the net zero carbon ready standard are to be implemented. This includes requiring high levels of building energy efficiency and performance, low carbon heating systems and integrated renewable energy sources such as Solar PV. In this respect, the vision for Woolfox is fundamentally underpinned by an ethos of 'In Statera' which translates to 'in balance'. For example, the Minerals Resource Assessment, prepared by Hughes Craven, has identified the potential to prior extract any suitable minerals resources that remain at the site, to ensure that this finite resource is not sterilised by the development proposals. Opportunities to utilise these materials, as part of the construction of Woolfox would then be explored, which would assist in reducing carbon emissions and also in the creation of a distinctive local character for the settlement.

5.15. Consequently, as demonstrated above, the proposals for a new settlement at Woolfox would fully accord with the Council's Local Plan objectives.

**Question 3 (Policies not proposed to be changed significantly): Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not, please provide details.**

5.16. We accept that the list of Local Plan policies identified in Proposal 3 of the Issues & Options consultation document are unlikely to require significant alteration as part of the Local Plan Review. However, some of the policies listed may require minor amendments to ensure that they would remain consistent with the spatial strategy for development that will be progressed through the Local Plan Review, and in response to any updated evidence that may be prepared to support the Plan Review.

5.17. For example, **Policy H4: Meeting Housing Needs**, it is our view that the wording contained within the policy itself would be consistent with the Framework and, therefore, acceptable for retention in its current format. However, the supporting text for this policy sets out a recommended market and affordable housing mix that is to be delivered through residential development proposals in South Kesteven; this recommended housing mix is drawn from the Strategic Housing Market Assessment [SHMA] published in 2014. Similarly, the supporting text identifies the needs for care homes and extra facilities within the District based upon Lincolnshire County Council's Adult Social Care Position Statement published in 2014. In view of the Council's timescales for the adoption of the Local Plan Review, which currently envisages adoption of the LPR in December 2024, these evidence base documents are likely to be more than 10 years old by the time of adoption. In addition, the use of the Lincolnshire County Council's Adult Social Care Position Statement as the basis for identifying housing needs for older people would not be consistent with the Planning Practice Guidance [PPG] (Paragraph 004 Ref: 63-004-21090626). As such, it would be appropriate for the Council to consider whether the recommended housing mix and adult social care needs would remain up-to-date at the time of adoption and, consequently, whether the Plan Policy or supporting text may require amendment in view of any up-to-date evidence will need to be collected.

5.18. Similarly, we contend that some of the policies may need to be updated to ensure accordance with the emerging Environmental Bill's requirement for development proposals to deliver a minimum 10% Biodiversity Net Gain and/or in view of the Council's zero carbon agenda that is to be pursued, in response to Climate Change Emergency that has been declared for the District. In this respect, **Policy SD1: The Principles of Sustainable Development in South Kesteven** and **Policy EN2: Protecting Biodiversity and Geodiversity** would be the most likely policies to require minor amendments to ensure consistency with these objectives/statutory requirements.

5.19. Finally, we propose that **Policy E7: Rural Economy** does require minor amendments to ensure that the policy remains consistent with the provisions of the Framework (Adopted February 2019). Specifically, Paragraph 83 of the Framework states that planning policies and decisions should enable "*the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new*

*buildings*” [emphasis added]. At present, Policy E7 of the Local Plan may be considered to be over-restrictive in the criteria it imposes for allowing new buildings to support rural economic development, in comparison to the provisions of the Framework, and, as such, some minor amendments may be required. Similarly, Paragraph 84 of the Framework recognises that some local business needs in rural areas may have to be found beyond existing settlements, in locations that are not well served by public transport. However, in such circumstances, development proposals are required to demonstrate that it has exploited any opportunity to make a location more sustainable. At present, the Local Plan policy is not appropriately aligned with the provisions of Paragraph 84 of the Framework, and, therefore, should be amended.

**Question 4 (Plan Period): Do you agree with the proposed plan period up to 2041? If not, please provide details.**

- 5.20. We fully support the recognition of the plan period to 2041. Paragraph 22 of the Framework sets out the requirement for strategic policies to look over a minimum 15 year period from adoption. In view of the timescales for the adoption of the Local Plan Review, as set out in the Council’s Local Development Scheme published in August 2020, which anticipates adoption in December 2024, a plan period running to 2041 would be in accordance with the provisions of the Framework.
- 5.21. However, in terms of the baseline date for the Local Plan Review, we consider that the proposed 2018-base date is not appropriate. The consultation document advocates the use of a 2018 baseline as it aligns with the evidence being used for calculating the Local Housing Need for the District. However, since the preparation of the Issues & Options document, new household projections and affordability ratios have been published. The latest household projections (which are 2018-based) demonstrate a continued decline in the projected growth of the population nationally and, as a consequence, would not assist with achieving the Government’s stated policy objective of significantly boosting the supply of housing. As a result, the PPG (Paragraph 005 Ref: 2A-005-20190220) continues to support the use of 2014-based household projections through the standard method calculation of local housing need. In the case of the affordability ratio to be used, the latest data, published in 2020, provides datasets which run until 2019. In this respect, the PPG supports the use of this latest dataset in the calculation.
- 5.22. Consequently, in view of the evidence being used as part of the Local Plan Review, it is more appropriate for the baseline date to be set at 2019/20 rather than the current proposed 2018 base-date.
- 5.23. It should be recognised that the base date may need further consideration in the context of the Government’s proposed changes to the standard method, which may have implications for the baseline data to be used in calculating the District’s Local Housing Need, and therefore, the appropriate base date for the plan in view of the evidence base being used. Given that the proposed changes to the standard method are capable of being implemented through revisions to the PPG, these changes may be implemented during the preparation of

the Local Plan Review, and as such, are likely to require appropriate consideration within this Plan.

**Question 5a (Settlement Hierarchy): Do you think the settlement hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made.**

- 5.24. The National Planning Policy Framework is underpinned by a presumption in favour of sustainable development (Paragraph 11). It is, therefore, considered rational that development should be directed to locations which are (or can be made) sustainable, where development would be supported by a range of local services and facilities. Within this context, we fully support the principles of the settlement hierarchy identified in the Local Plan and we do not propose any amendments to the position of the individual settlements identified within this hierarchy.
- 5.25. However, in light of the potentially significant uplift in the housing requirements for the District to be delivered over the plan period, as discussed further below, we are concerned that there is likely to be insufficient capacity of appropriate sites to support the continuation of the current spatial development strategy, whereby development is directed towards the Market Towns and Larger Villages, and which may, therefore, result in additional development being directed to lower order settlements within the hierarchy.
- 5.26. In this respect, the Grantham Capacity and Limits to Growth Study (2015) highlighted the potential constraints to development within the town, beyond the current allocations identified within the adopted Local Plan. In particular, it is recognised that the land to the west of the Town is limited for a number of reasons, including the setting of Harlaxton Manor, a limited landscape capacity, and the strength and relative impermeability of the A1 as a barrier. Whilst the land to the east and south of the Town is limited by the 'green rim' that surrounds Grantham, which is considered to be of high landscape and heritage value. It is acknowledged that land beyond these areas is potentially suitable for development, but such schemes would be physically separated from the current and committed urban edge.
- 5.27. Similarly, in the case of Stamford, the Capacity and Limits to Growth Study (2015) concluded that the allocated comprehensive extension to the north of the Town was the only appropriate solution for development. In this respect, it is noted that, as a result of the positioning of the administrative boundaries around Stamford, the identification of this site requires the formal allocation of land at Quarry Farm within Rutland for 650 dwellings within the Rutland Local Plan 2018-2036, to ensure that this Sustainable Urban Extension is brought forward in a comprehensive manner. Therefore, it is considered that there is limited capacity for major development schemes within and/or adjacent to the Town, particularly in view of the challenges imposed by the administrative boundaries in this area.
- 5.28. Consequently, in light of the above, and in seeking to direct development towards the most sustainable solutions, we propose the allocation of Woolfox as a new settlement, based on Garden Community principles, through the Rutland Local Plan 2018-2036, as an appropriate, additional strategy for meeting the development needs of the District and the wider sub-region. As detailed elsewhere in this statement, the site is strategically well-placed adjacent

to the A1 between Grantham and Stamford to enable the creation of a market towns alliance which would drive up standards of living, education, leisure and recreation in the area by generating a sub-regional economic cluster that would attract businesses to the area. The 2014 SHMA recognised the strong functional relationship that exists between Rutland and South Kesteven, particularly in view of the economic and functional relationship that exists between the two authorities as a consequence of the administrative boundaries surrounding Stamford. In this regard, we consider Woolfox is an opportunity to enhance this functional and economic relationship, to complement the growth strategy evoked by South Kesteven District Council within the adopted Local Plan, rather compete with it.

5.29. Therefore, in respect of the settlement hierarchy, we propose that the hierarchy should be amended to include the identification of a new settlement at Woolfox, in order to assist in meeting the District's, and wider sub-region's, development needs. The position of the new settlement within the established settlement hierarchy should be reflective of the scale of development, and the level of services, that would be provided as part of the scheme during the identified plan period to 2041. In the case of Woolfox, as evidenced later in this statement, the extent of services provided, and the scale of residential and employment development within the Plan Period, would position the settlement at the same level as the identified Market Towns of Stamford, Bourne and The Deepings.

**Question 5c (New Settlement): Given the scale of housing growth to be provided for in this Local Plan, is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on Garden Village principles? If so, please outline any suitable and deliverable proposals.**

5.30. As set out in our response to the previous question, in light of the scale of housing growth to be accommodated in the Local Plan Review, and the constraints to further development allocations within the currently identified sustainable locations for development, namely the Market Towns and Larger Villages, and in particular Grantham and Stamford, we fully support the identification of a new community as an appropriate strategy for meeting the identified housing growth.

5.31. We contend that the identification of a new settlement would be consistent with Paragraph 72 of the Framework (Adopted February 2019), which states the following:

*“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well-located and designed, and supported by the necessary infrastructure and facilities”*

5.32. Consequently, we are promoting Woolfox as a potential new sub-regional town, which can assist in meeting the development needs of the Housing Market Area. In this regard, as detailed previously, it is recognised that a strong functional, economic and socially interactive relationship exists between Rutland and South Kesteven and, thus, we consider the site would be appropriate for meeting the increased housing needs in South Kesteven District, despite the site being located within Rutland's administrative boundaries.

- 5.33. In respect of Woolfox’s deliverability credentials, the supporting documentation, prepared on behalf of the Landowner Clients in response to the recently completed Rutland Local Plan 2018-2036 Regulation 19 Consultation and included within this submission, sets out detailed evidence regarding the realism, viability and deliverability of the proposal. We would direct the Council’s attention to this supporting documentation rather than repeating this evidence in full within this Statement.
- 5.34. Furthermore, in terms of the extent of development that could be delivered at Woolfox during the South Kesteven Local Plan Review plan period to 2041, Appendix 3, sets out a proposed development trajectory based on the evidence set out within the Lichfield’s “Start to Finish” Report (Second Edition: February 2020) and other evidence of delivery collated from strategic sites elsewhere. This indicates that during the Plan Period, circa 3,500 homes, employment land (including TRSA), a Primary School, a Secondary School and the Grade Separated Junction would be delivered, alongside initial delivery of the Retirement Village.
- 5.35. Thus, Woolfox represents a realistic, viable and deliverable opportunity to allocate a new settlement to meet the identified uplift in development needs within the District, and the wider sub-region.

**Question 6 (Housing Need and Requirement): Do you agree with the use of 754 dwellings per annum as the identified housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?**

- 5.36. In accordance with Paragraph 60 of the Framework, we fully support the use of the standard method for determining the minimum number of new housing that the Local Plan Review should accommodate during the plan period. In this regard, we sympathise with the challenge that the District Council currently faces in establishing an appropriate local housing need given the present high degree of uncertainty that exists regarding the standard method for calculating local housing needs.
- 5.37. The Issues & Options Consultation document identifies a Local Housing Need of 754 dwellings per annum using the 2014-based household projections and 2018-based affordability ratios. However, as mentioned previously, since the preparation of the consultation document, the Office for National Statistics have released the 2019-based affordability ratios. Using this dataset as part of the current Standard Method for calculating Local Housing Need results in an identified housing need for the District of 732 dwellings per annum. This identified housing need would still be higher than the identified need of 650 dwellings per annum included within the adopted Local Plan; however, it is noted that the adopted Plan makes sufficient allocations to deliver an average of 753 dwellings per annum. Therefore, on this basis, the adopted Local Plan already identifies sufficient housing to meet the current calculation of the Local Housing Need for the District, albeit with a very minimal buffer.
- 5.38. Nonetheless, the Government has been clear in stating that the current standard method is not appropriate for achieving the identified policy objective of delivery 300,000 dwellings per annum nationally. In response to this, consultation has recently concluded on

fundamental reforms to the planning system as set out within the Planning for the Future White Paper, and also short-term measures set out within the “Changes to the Current Planning System” paper. The proposed short-term modifications include plans to amend the standard method for calculating Local Housing Need, in advance of the more fundamental, systemic changes identified in the White Paper. Utilising the proposed revised Standard Method would result in a significant increase in the District’s Local Housing Need, above the currently identified Local Housing Need and adopted Local Plan requirements, to 839 dwellings per annum.

- 5.39. In relation to the above, it is important to note that the proposed changes to the Standard Method could be implemented via amendments to the PPG and, as a consequence, could be brought in within the short-term. As such, it is anticipated that the implementation of the revised standard method is likely to take place during the preparation of the ongoing Local Plan Review and, therefore, it is important that the Council seeks to plan positively to meet this uplift Local Housing Need now, rather than proceeding on the basis of the potentially time-limited, lower housing need currently identified.
- 5.40. Furthermore, it is acknowledged that recent media publications<sup>2</sup> have indicated that amendments will be made to the revised Standard Method, following strong objections by MPs. However, it is understood that these revisions are likely to seek to increase housing delivery in the Midlands and the North, as part of an ambition to ‘level-up’ the Country, and therefore, it is expected that any further changes to the proposals would only result in further increases to the Local Housing Need for local authorities in this area, including South Kesteven.
- 5.41. Notwithstanding the above proposed changes to the Standard Method, the PPG is clear that the Local Housing Need figure calculated using the Standard Method should be viewed as a starting point and a minimum figure. Paragraph 010 of the PPG (Ref: 2A-010-20190220) establishes that there may be circumstances where it is appropriate to consider whether the housing need is higher than the standard method indicates. In the case of South Kesteven, it is understood that there is an acute demand for affordable housing within the District. Inspector Spencer’s Report on the adopted Local Plan noted that affordable housing demand represented a significant proportion of the identified housing need for the area and, therefore, considered whether increase the housing requirement would be beneficial in delivering additional affordable housing. Consequently, it will be necessary for the District Council to undertake an appropriate assessment as part of the Local Plan Review.
- 5.42. In respect of affordable housing needs, it should be recognised that the submitted proposals at Woolfox include provision for delivering 30% affordable housing on-site, through a range of tenure and ownership models, which could make a substantial contribution towards meeting the identified need across the housing market area.
- 5.43. As highlighted above, it is important that this Local Plan Review positively contributes towards meeting the Government’s stated policy objective of delivering 300,000 dwellings

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<sup>2</sup> <https://www.bbc.co.uk/news/uk-politics-54950012>

per annum and, therefore, is prepared on the basis of meeting the higher Local Housing Need calculated by the revised Standard Method, as a minimum, rather than considering the implication of these proposals through Plan Reviews. Whilst, uncertainty exists regarding the Standard Method, it is clear that the direction of Government policy is to continue to seek ways, through both short-term policy and guidance changes, as well as legislative changes and systemic reform, to increase the supply of housing.

5.44. Within this context, and the requirement for development plans to positively prepare for meeting any unmet needs, Table 1, below, sets out the Local Plan position, identified housing requirement and the Local Housing Need using the current and revised standard method for the authorities within the Housing Market Area.

Local Authority	Local Plan Status	Date	Current/ Emerging Local Plan Requirement	Current / Emerging Local Plan Provision	Local Housing Need (Current Standard Method)	Local Housing Need (Revised Standard Method)
South Kesteven District Council	Local Plan Adopted	January 2020	650dpa	753dpa	732dpa	839dpa
Rutland County Council	Local Plan Review (Regulation 19 Consultation)	28 August – 6 November 2020	130dpa	163dpa	122dpa	307dpa
South Holland District Council	South East Lincolnshire Local Plan Adopted	March 2019	467dpa	467dpa	418dpa	580dpa
Peterborough City Council	Local Plan Adopted	July 2019	972dpa	1,154dpa	926dpa	1,282dpa

Table 1: Local Plan Status and Local Housing Need in the Peterborough Housing Market Area

5.45. Table 1 demonstrates that all of the authorities within the Peterborough Housing Market Area have allocated (or are proposing to allocate in their emerging Plan) sufficient land to meet the identified Local Housing Need, calculated using the current Standard Method. However, none of the authorities have identified sufficient land to meet their needs under the revised standard method. Even if all of the authorities were to begin undertaking Local Plan Reviews today, it would still be at least 5 years before any new allocations started to deliver housing and, as such, there would be a delay in the authorities meeting these identified housing needs.

5.46. In relation to the above, it is noted that South Holland District Council and Peterborough City Council both adopted Local Plans in 2019. Therefore, as per Paragraph 33 of the Framework and Regulation 10A of the Town and Country Planning (Local Planning) Regulations 2012, these plans are to be reviewed once in every five years. Similarly, as confirmed by Paragraph 005 of the PPG (Ref: 68-005-201907222), the local housing need contained within these Local Plans will also remain valid for development management purposes within this timeframe. In this light, it should be recognised that neither of these authorities have commenced work on undertaking an early Local Plan Review. As a result, it is possible that there may be a significant period of delay between the implementation of any revised standard method and the Local Plans for South Holland and Peterborough being reviewed and planning for the increased housing needs that are likely to be established. In this scenario, there are likely to be unmet housing needs within the housing market area during this period of delay.

5.47. Consequently, we contend that it would be appropriate for South Kesteven to plan positively for the higher Local Housing Need figure identified by the revised Standard Method, as the direction of Government policy clearly indicates that the housing need for the area is only likely to increase beyond the calculation of the Local Housing Need using the current formula. Within this context, it would be beneficial for the Council, and the other local authorities in the housing market area, to pursue a spatial development strategy which can deliver the significant uplift in housing across the HMA without the need for undertaking comprehensive Plan Reviews. As such, the allocation of land at Woolfox for a new settlement comprising a minimum of 7,500 dwellings would assist in meeting the identified housing needs of the HMA within the short, medium and longer-term.

**Question 7a (Focusing Housing Growth on Grantham): Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals?**

**Question 7b (Stamford, Bourne and The Deepings): Do you agree that Stamford, Bourne and The Deepings should remain a focus for growth? If not, please provide details and alternative proposals.**

**Question 7e (Consideration of Market and Deliverability): Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which areas?**

5.48. As detailed in our previous responses, it is our view that the Local Plan Review should plan positively for meeting the identified Local Housing Need calculated using the revised Standard Method of 839 dwellings per annum, across a plan period from 2019-2041. As a result, the identified housing need for the Plan Period would be a minimum of 18,458 dwellings.

5.49. Table 2 below, which has been extracted from the Issues & Options document, sets out the Council's position in respect of the Local Housing Need, the current completions and commitments and the level of housing growth which would remain to be identified through the Local Plan Review.

5.50. Taking into account the completions and commitments as of April 2020, as set out in Table 2, and using a minimum housing need of 18,458 dwellings for the plan period, would result in a residual housing requirement of a minimum of 2,351 dwellings to be identified the Local Plan Review. However, the Council have indicated that they would aim to achieve a minimum 10% supply-side buffer. Therefore, in order to deliver this stated aim, a minimum of 4,197 dwellings will need to be allocated in the Local Plan Review (notwithstanding any further uplift in Local Housing Need which may be identified).

	Local Housing Need 2018-41	Potential Spatial Distribution	Net Completions April 18-March 20	Commitments at April 2020	Capacity to be identified in Local Plan Review	Total (including 10% buffer to supply)
Grantham		50-55%	447	8,728	363-1,317	9,538-10,492
Stamford		15-15%	384	2,395	82-655	2,861-3,434
Bourne		8-10%	415	747	364-746	1,526-1,908
The Deepings		8-10%	52	1,181	293-675	1,526-1,908
Larger Villages		8-10%	90	1,375	1,443	1,526-1,908
Supply in other Settlement and Windfall allowance across the District		No set requirement – to be determined by existing commitments and through windfall allowance	28	265	600*  *30dpa windfall across period 2021-41	893
<b>Total</b>	<del>23 years @ 754 dpa = 17,342</del>  <b>22 years @ 839 dpa = 18,458</b>		<b>1,416</b>	<b>14,691</b>	<del>1,763</del> – <b>4,436</b>  <del>* 2,969</del> <b>* required to achieve 10% buffer</b>  <b>2,351 required to meet minimum requirement</b>  <b>4,197 required to achieve a 10% buffer</b>	<b>19,076 including 10% buffer</b>  <b>20,304 including 10% buffer</b>

Table 2: Local Housing Need and Initial Spatial Distribution across District (Source: Local Plan Review Issues & Options Consultation Document) [AG&Co Revisions in red]

5.51. In respect of the potential distribution of this development across the District, we fully support the continued recognition of the Market Towns (Grantham, Stamford, Bourne and The Deepings) as being the focus for growth. As previously identified, the Framework is

underpinned by a presumption in favour of sustainable development (Paragraph 11) and, therefore, it is considered rational that development is focused on locations which are (or can be made) sustainable, where schemes will be supported by a wide range of local services and facilities. Table 2 would indicate that, based on the completions and commitments already identified, the Market Towns will remain the focus for growth during the Local Plan Review.

- 5.52. In relation to this, in the case of Grantham, it is appreciated that the allocations identified in the adopted Local Plan (Adopted January 2020) at Spitalgate Heath and the Prince William of Gloucester Barracks are proposed to deliver significant housing beyond the current 2036 plan period; 2,050 homes and 2,225 homes post-2036, on these sites respectively. Consequently, the continued delivery of these sites would be expected to account for the full residual housing requirement to be delivered in Grantham as part of the Local Plan Review, rather than any new allocations being required.
- 5.53. However, it should be cautioned that the delivery of these two sites is closely aligned with the programme for the delivery of the Grantham Southern Relief Road and, as such, any delays in the delivery of this infrastructure, or any other unforeseen delays, may result in housing delivery being pushed back, beyond the plan period, and thus resulting in a reduction in the overall contribution that these sites may make to housing delivery by 2041.
- 5.54. Similarly, if the development trajectories of these two sites are such that it is anticipated that further allocations would be necessary in Grantham to meet the uplifted housing needs, we are concerned whether the Town would be capable of supporting new allocations for development. The potential constraints to further development adjacent to the Town, as identified in the Capacity and Limits to Growth Study (2015) have been discussed above, and we do not wish to repeat these concerns here. In this regard, we have also identified concerns about the capacity of Stamford to accommodate additional development beyond the identified housing allocation. Thus, it is our view that the allocation of any additional sites within the Market Towns would result in significant adverse impacts in respect of landscape and heritage value and, therefore, would not be appropriate.
- 5.55. Notwithstanding the lack of availability of suitable sites, as identified above, it is acknowledged that there is already significant planned growth within the Market Towns through the allocation of major urban extensions and Garden Communities, identified within the adopted Local Plan. Therefore, it would be questionable as to whether the market would be capable of supporting any increased housing delivery within these areas, during the plan period to 2041, or whether market saturation would result in the delivery of additional allocations being pushed back beyond the end of the plan period. In this regard, we would strongly recommend that the Council seeks to prepare an assessment of the market capacity to accommodate additional development in the Market Towns, before considering whether to allocate further development sites within these settlements.
- 5.56. In light of the above, we wholeheartedly agree that market capacity and deliverability are critical considerations for the proposed spatial strategy. Within the Inspector's recent determination on the soundness of the North Essex Authorities Shared Strategic (Section 1)

Plan [NEA SSP], Inspector Clews cited that the key question in determining whether a Plan is effective, in accordance with Paragraph 33 of the Framework, is whether the Plan is deliverable. Therefore, if the strategy contained within the Local Plan Review is not capable of being delivered then the Plan would not be sound.

5.57. Consequently, it is our view that the allocation of any additional sites within the Market Towns, beyond those carried forward from the adopted Local Plan, would result in significant adverse impacts in respect of landscape and heritage value and may not be capable of being appropriately sustained by the market capacity during the plan period. Therefore, we contend that the Local Plan Review should pursue an amended strategy, which includes the identified of a new settlement.

5.58. Within this context, we propose the allocation of Woolfox as a sub-regional new settlement that would complement the current spatial strategy identified by the Council. The site has been assessed as being viable and deliverable and, therefore, is capable of providing a longer-term development option which would meet the current and future development needs of the District and the wider housing market area.

**Question 9a (Strategic Employment Allocations): Do you agree that the Strategic Employment Allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan, unless strong and robust evidence suggests that they are no longer suitable or deliverable? If not, please provide details.**

**Question 9b (Other Employment Allocations and Increasing Flexibility of Established Employment Areas): Do you agree the Other Employment Allocations set out in Policy E3 should be reviewed taking into account an updated Employment Land Study? If not, please provide details.**

5.59. In principle, we agree with Proposal 9 contained within the Issues & Options document. However, we would stress that it is important that the review of the Employment Land Study is not restricted to assessing the suitability of the Other Employment Allocations identified within Policy E3 only. We contend that the updated Employment Land Study should consider whether the overall employment strategy remains appropriate and deliverable, including analysing the appropriateness of the Strategic Employment Allocations. The Covid-19 pandemic is likely to have changed the employment land market substantially, even in the short-time since Inspector Spencer considered the employment strategy in the adopted Local Plan as being sound, and, therefore, it is important that a review of the Employment Land Study appropriately assesses the current demand for employment land, and the likely future pattern of demand in a post-Covid market. As an example, it is evident that Covid-19 has accelerated the transition towards home-working and has further driven the use of e-commerce. In this regard, the previous comments raised by Inspector Clews regarding deliverability of the strategy, would be equally applicable in considering the employment land strategy.

5.60. Subject to the updated Employment Land Study confirming that the overall strategy remains appropriate and deliverable, we would support the continuation of the Strategic Employment Land Allocations included in Policies E1 and E2. Inspector Spencer, when

assessing the adopted Local Plan, accepted that the strategy for the over-provision of employment land within the District, primarily as a result of the growth agenda being pursued through major allocations at Grantham, was sound. Given the relative recency of these conclusions, and the continued pursuit of this growth agenda by the Council, it would appear reasonable to retain the overall employment land, unless the updated ELS provides clear evidence that would indicate that this strategy is no longer deliverable and therefore, should be re-considered.

- 5.61. Similarly, Inspector Spencer also concluded that the Strategic Employment Allocations identified in Policy E1 and Policy E2 were sound for delivering the identified employment strategy. In view of the fact that these allocations are predominately comprised of sites benefiting from planning permission, including a Designer Outlet Centre at Grantham, there would appear to be no justification to de-allocate these sites, unless the updated evidence would indicate that the overall strategy is not longer appropriate or that these sites cannot be delivered.
- 5.62. Furthermore, in respect of potential changes to the demand for employment land within the District, that may be identified within the updated evidence or result from the extension to the Plan Period, it is recognised that Inspector Spencer considered that the Employment Land Study (2015) was overly cautious in terms of the opportunity available to South Kesteven to capitalise on its access to the A1 and the increasing demand for logistics and warehousing facilities. In view of these comments, and the anticipated changes to the market resulting from Covid-19 alluded to above, we would anticipate that the reviewed Employment Land Study will identify an increase demand for logistics and warehousing within South Kesteven.
- 5.63. In light of the above, we consider that an allocation of the land at Woolfox for a new settlement, based on Garden Community principles, would complement the growth agenda that the District Council are pursuing through the employment land strategy, rather than competing with the identified Strategic Employment Allocations. It is our view that the allocation at Woolfox would assist in developing a Market Towns alliance that would boost all of the Towns along the A1 corridor by providing a stronger sub-regional economic offer, whereby the towns would complement each other rather than compete with each other.
- 5.64. For example, Woolfox has been successful in securing a formal Expression of Interest (**Appendix 4**) from Applegreen from the provision of a Trunk Road Service Area on-site; such a facility would be complementary to the Designer Outlet facility that benefits from planning consent on the edge of Grantham
- 5.65. Furthermore, Woolfox's location directly adjacent to the A1 means that it is strategically well placed to deliver logistics and warehousing facilities, and thus, further capitalising on the opportunities presented by the strategic road network corridor. In this regard, WF1: Vision Document & Master Plan envisages circa 27.39 hectares of B2/B8 Use Class space being delivered on employment land that would front onto the A1. Furthermore, a formal Expression of Interest (**Appendix 5**) has been received from Pears Property Group for the delivery of this employment land.

5.66. Notwithstanding the above, as referenced previously in this Statement, it is our view that the overall employment proposition for Woolfox would assist in the delivery of the wider economic strategy for South Kesteven, as identified by the GLLEP and within the Economic Development Strategy, namely, seeking to deliver better quality jobs and strengthening the skills of the local population. The aforementioned involvement of De Montfort University at Woolfox provides the opportunity develop skills through lifelong learning opportunities and also explore opportunities for high quality research and development schemes, in conjunction with the commercial partners that would be located on-site.

5.67. Consequently, subject to the updated Employment Land Study confirming that the overall strategy remains appropriate and deliverable, we would support the continuation of the Strategic Employment Land Allocations included in Policies E1 and E2 for delivering in the growth agenda being pursued by the District Council. In this regard, we consider that the allocation of land at Woolfox for a new settlement would complement this agenda and help to deliver the overall vision and objectives for the District.

**Question 1 (Climate Change Policies): Are the existing policies in the adopted Local Plan sufficient to meet the current and future challenge of climate change? If not, please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.**

**Question 11a (Energy Performance Standards in Residential Development): Do you think that the new Local Plan should require higher energy performance standards than are required by the Building Regulations for residential development, up to Level 4 of the Code for Sustainable Homes?**

**Question 11b (Energy Performance Standards in Non-Residential Development): Do you think that the new Local Plan should require higher energy performance standards in non-residential development, and if so, what standards should be required?**

**Question 11c (Viability Implications of higher Energy Performance Standards): If you think the Local Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so, please provide this evidence, do you have any suggestions whereby other developer contributions might be appropriately reduced, in order to ensure development remains viable?**

5.68. In light of the timescales for the preparation and adoption of the Local Plan Review, we consider that the policies of the Local Plan are likely to require amendment to consider the implications of the Environment Bill, that is currently progressing the Parliament, and also the outcome of the Government's Future Homes Consultation.

5.69. With regards to the Environment Bill, the National Planning Policy Framework and the adopted South Kesteven Local Plan both already include a requirement for development proposals to seek to secure biodiversity net gains. However, the Environment Bill will, once it achieves royal assent, impose a statutory requirement to achieve a 10% net gain in biodiversity value. As such, it will be necessary for the Local Plan policies to be amended to reflect this statutory requirement; at present, **Policy EN2: Protecting Biodiversity and**

**Geodiversity** states that the Council will seek to deliver a net gain on all proposals “where possible”, such provisions would not be consistent with the statutory requirement that is set to be imposed.

- 5.70. Furthermore, in the case of the Government’s Future Homes Consultation, this consultation paper proposes amendments to the Building Regulations which would require all homes built from 2025 to deliver 75-80% reductions in CO<sub>2</sub> emissions compared to homes built today. In addition, the Planning for the Future White Paper indicates that all homes built under the Future Homes Standard would be “net zero carbon ready”, with the ability to become fully zero carbon homes over time, as the electricity grid continues to decarbonise, and, therefore, reducing the need for retrofitting. As adopted, the current Local Plan policies make no reference to the need for homes delivered during the plan period to be ‘zero carbon ready’, and as such, the plan policies are likely to need amendment to introduce this requirement. It is our view that this amendment would also be consistent with Council’s response to their declared Climate Change Emergency, in which they are seeking to be net zero carbon by 2050.
- 5.71. For non-residential development, it is anticipated that Government will introduce a similar requirement i.e. all non-residential properties to be developed as being net zero carbon ready, in due course. Therefore, we consider that it would be appropriate for the Local Plan Review to plan positively and prepare for the introduction of these standards now.
- 5.72. In respect of the deliverability of these higher energy performance standards, WF13: Energy Strategy, prepared by Turley, sets out the proposed energy strategy for Woolfox. This strategy includes a commitment to go beyond the new national standards, such as the Future Homes Standard, by delivering all buildings to the UKGBC net zero construction standard. Whilst both building-integrated and masterplan-scale approaches are identified for meeting the net zero carbon ready agenda, including through the provision of a 15MW solar farm and anaerobic digestion facility.
- 5.73. WF6: Viability Statement has assessed the viability of Woolfox, on the basis of the proposals as set out in the supporting documents, including accounting for the implementation of the identified Energy Strategy and, therefore, meeting the higher energy performance standards set out above. This document demonstrates that the scheme is viable, and thus, deliverable on a policy-compliant basis and whilst meeting all other developer contribution requirements.
- 5.74. Thus, we propose that the Local Plan policies will require amendment to account for the heightened standards to be imposed by the emerging Environment Bill, and the Future Homes Consultation. This would include the requirement for all development proposals to deliver a 10% net gain in biodiversity value and for all properties (residential and non-residential) to be built to be net zero carbon ready, as a minimum standard. The proposed new settlement at Woolfox has been designed to go beyond these new standards by delivering all buildings to a net zero construction standard, and evidence has been provided that such a commitment can be delivered without the need to reduce other developer contributions or policy requirements.

## 6. Conclusions

- 6.1. On behalf of our Landowner Clients, we are seeking to work with Rutland County Council and the other authorities of the Peterborough Housing Market Area (including South Kesteven District Council) in promoting the land at Woolfox for formal allocation for a proposed sub-regional new settlement, based on Garden Community principles.
- 6.2. We fully support the objectives contained within the adopted South Kesteven Local Plan (Adopted January 2020) and consider that it is appropriate for these objectives to be carried forward within the Local Plan Review, subject to any necessary amendments that may be required to account for the proposed development strategy, once this has been agreed. It is our view that allocation of Woolfox as a new settlement would fully accord with these identified objectives.
- 6.3. Furthermore, we wholeheartedly support the use of the standard method for determining the minimum number of new homes that the Local Plan Review should accommodate during the plan period. In this respect, we sympathise with the challenge that the Council faces in establishing an appropriate local housing need, in light of the present uncertainty that exists regarding the standard method. However, it is our view that it would be appropriate for the District Council to plan positively for the higher Local Housing Need figure identified by the revised Standard Method. The direction of Government policy clearly indicates that the housing need for the area is likely to only increase beyond the identified housing need using the current standard method and, as such, it would be appropriate to plan positively for the uplift in housing need now.
- 6.4. In this regard, we are concerned whether there is sufficient capacity in the identified Market Towns (Grantham, Stamford, Bourne and The Deepings) to accommodate the significant uplift in housing that is required within the Plan Period. It is our view that the allocation of further sites may not be capable of being supported by the market and, in any event, are likely to result in significant adverse impacts on the Towns' heritage and landscape assets. Therefore, we contend that it would be beneficial for the Council to pursue an amended spatial development strategy which is capable of delivering the significant uplift in housing across the District, without the need for undertaking further lengthy reviews. In this regard, the allocation of land at Woolfox for a new settlement comprising a minimum of 7,500 dwellings would assist in meeting the identified housing needs of the District, and the wider sub-region, within the short, medium and longer-term.
- 6.5. As a consequence of the above, we propose that the settlement hierarchy should be amended to include the identification of a new settlement at Woolfox. The position of Woolfox within the settlement hierarchy should be reflect of the scale of development and the level of services that would be delivered during the plan period. It is our view that this would mean Woolfox should be appropriate positioned alongside Stamford, Bourne and The Deepings as a Market Town.
- 6.6. Furthermore, we consider that the updated Employment Land Study should assesses whether, in the context of the Covid-19 pandemic, whether the Council's employment land

strategy and Strategic Employment Land allocations remain appropriate and deliverable. Notwithstanding the above, it is our position that the allocation of the land at Woolfox would complement the Council's strategic growth agenda at Grantham through the creation of a market town's alliance that would form a stronger, collective sub-regional economic cluster that would drive up standard of living, education, leisure and recreation.

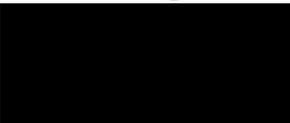
- 6.7. Andrew Granger & Co would like to remain involved through the preparation of the South Kesteven Local Plan Review and, therefore, request to be informed of any future consultation opportunities and when the document is to be submitted for Examination.

## Appendix 1: DMU Expression of Interest



De Montfort University  
The Gateway  
Leicester  
LE1 9BH

Adam Murray  
Andrew Granger and Co,



5<sup>th</sup> October 2020

Dear Adam,

I am writing to you to confirm that De Montfort University, in particular its researchers and staff leading the Sustainable Living Lab (Sulab) initiative, are interested in developing a long-term collaboration with the Woolfox Garden Community, Rutland. We believe that the opportunity presented by the Woolfox project would be ground breaking in terms of sustainable development, energy efficiency and life-long learning.

Through the university's commitment to enhancing the sustainability of our communities we would like to explore a relationship that enables our researchers to create and share knowledge through a long-term association with Woolfox and its vision.

This letter confirms our commitment to continue working together on creating new sustainable solutions for Woolfox that will benefit future generations of residents, employers and those who visit Woolfox. It is an innovative and exciting opportunity for the University to play a key role in evolving and shaping a net zero carbon and energy efficient development fit for the twenty-first Century and beyond.

I am content for this letter to be produced as part of your representations to the emerging Rutland Local Plan.

Best wishes,



Andy Collop  
Interim Vice-Chancellor

**Professor Andy Collop**  
Interim Vice-Chancellor, De Montfort University  
The Gateway, Leicester, LE1 9BH, UK E: [acollop@dmu.ac.uk](mailto:acollop@dmu.ac.uk) T: +44 (0)116 207 8456

## Appendix 2: Empingham Medical Centre Expression of Interest

On 10 Nov 2020, at 11:55, HALCROW, Ian (EMPINGHAM MEDICAL CENTRE) [REDACTED] >  
wrote:

**\*\*This message has been received from a sender outside of Andrew Granger & Company. Please be careful when opening attachments and clicking links.\*\***

Dear Andrew,

Trust you are okay.

I have spoken with my partners, and we would like to express an interest in Woolfox. Please can you keep me informed of developments.

Best regards

Ian

<image001.png>

Ian Halcrow

**Practice Business Manager**  
Empingham Medical Centre

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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<image003.png>

[www.empinghammedicalcentre.co.uk](http://www.empinghammedicalcentre.co.uk)

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## Appendix 3: Proposed Development Trajectory



						106 Agreement															
Primary School						Submission and Approval of Reserved Matters Application Completion of Section 106 Agreement															
Secondary School														Submission and Approval of Reserved Matters Application Completion of Section 106 Agreement							
Retirement Village															Submission and Approval of Reserved Matters Application						
Grade Separated Junction Application		Submission of detailed planning application		Planning permission granted																	
Minerals Extraction Application			Planning Application Submitted	Planning Permission Granted																	
<b>Housing Delivery</b>																					
Phase 1 (up to 750 dwellings)						50	75	100	100	100	100	100	75	50							750

Phase 2 (1,750 homes)								25	75	100	125	150	175	200	250	250	250	150				1750
Phase 3 (3,000 homes)																		100	250	250	250	850
<b>Total Housing Delivery</b>						50	75	125	175	200	225	250	250	250	250	250	250	250	250	250	250	3350
<b>Infrastructure Delivery</b>																						
Start of Construction on Site (Internal Infrastructure)						Start on Site	Internal Infrastructure															
Grade Separated Junction					Start on Site	Completion																
Employment Land						Start on Site																
Primary School						Start on Site			School Delivered/Completed													
Secondary School															Start on Site			School Delivered				
Retirement Village																	Start on Site			Operational		
Minerals Extraction				Start on Site																		Minerals Extraction Completed

## Appendix 4: Applegreen Expression of Interest

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**Subject:** RE: Woolfox TRSA - Subject to contract & board approval

**From:** [REDACTED]  
**Subject:** Woolfox TRSA - Subject to contract & board approval  
**Date:** 27 September 2020 at 12:02:13 BST  
**To:** [REDACTED]  
**Cc:** [REDACTED]

Subject to Contract & Welcome Break Board Approval

Steve,

Further to our various telephone conversations, I can confirm the land at Woolfox is of interest to Welcome Break Services Limited, to develop a new Trunk Road Service Area adjoining the A1.

As you know, Welcome Break run a variety of franchisee's including Waitrose, WH Smith, a shop offers, along with KFC, Burger King, Starbucks, Subway, Tossed, Pizza Express etc as our food brands. Further details about Applegreen and Welcome Break can be found in the link below:

[www.investors.applegreenstores.com](http://www.investors.applegreenstores.com)

I trust this will allow you to consider our offer in more detail, and happy to answer any questions or queries you may have.

I will look forward to hearing from you in due course.

All the best for now,  
Jess

**Jessica Lockwood**  
Head of Development

---

Welcome Break Holdings Ltd 2 Vantage Court, Tickford Street, Newport Pagnell, Buckinghamshire, MK16 9EZ  
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## Appendix 5: Pears Property Group Expression of Interest

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**Subject:** RE: 66 Acre Logistics Development Opportunity - A1 Woolfox, Stamford Rutland

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**From:** Ben Grossmann [REDACTED]  
**Sent:** 09 October 2020 12:54  
**To:** Sam Sutton [REDACTED]  
**Subject:** RE: 66 Acre Logistics Development Opportunity - A1 Woolfox, Stamford Rutland

Sam,

In relation to the employment land that forms part of the proposed Woolfox Garden Village at Stamford Rutland, Pears Property would be extremely interested in pursuing an employment led scheme for the whole 60 acres.

I trust this is helpful at the outset and look forward to continuing discussions in due course.

Regards,  
Ben

Ben Grossmann MRICS  
Investment Director  
Pears Property

[REDACTED]

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Pears Property is the trading name of Pears Property Advisory Services Limited Registered Number: 8253980 England

## Castle Bytham Parish Council

### Review of the South Kesteven Local Plan Issues and Options consultation

November 2020

#### **Brief**

As a reminder, the local plan is a statutory planning document, prepared by the officers of South Kesteven District Council. It contains the policies and proposed locations for sustainable growth and investment across SK.

It is being updated because the Inspector's final report of the plan, commits the council to undertake an early review of that plan. Normally it reviews every 5 years, however it was originally examined against a national policy which has now gone out of date. So it is being reviewed again now because there is a new national policy for plan making.

As a part of this review, most policies will not be subject to substantial change. The majority of the changes relate to updating housing needs and planning for housing growth to meet those needs. Those "housing needs" include Affordable, Rural, Self-Build, Market and Gypsy and Traveller.

#### **The Review**

The members of the CBPC Planning Working Group undertook a review of the Issues and Options report and are now presenting their review to the council and at the end of this review, will propose the response of CBPC. The responses must be received by Monday 23<sup>rd</sup> November.

There are 24 "Questions". They are in Blue. The proposed CBPC responses are in the green boxes.

If you require further information on the background of the question, please refer to the SKDC issues and options report.

#### QUESTION 1a–The Vision

Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level? If not please provide details.

A1a

Yes broadly the same.

#### QUESTION 1b–The Vision

Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District? If not please provide details.

A1b

There is no mention of affordability or job creation, and very little with regards to an environmental vision. There is no mention of affordable housing, hospital or health provisions or maintaining and improving the visitor economy. We do not feel that it is sufficient.

#### QUESTION 2–Objectives

Do you agree that the Objectives should remain the same for the new plan? If not please provide details.

A2

Yes

#### QUESTION 3–Policies not proposed to be changed significantly

Do you agree with the list of Local Plan policies that are not proposed to be changed significantly? If not please provide details.

A3  
No comment due to the number of policies we have been unable to compare insignificant changes

QUESTION 4–Plan Period  
Do you agree with the proposed plan period up to 2041? If not please provide details

Q4  
No comment

QUESTION 5a –Settlement Hierarchy Do you think the Settlement Hierarchy should be retained in the new Local Plan? If not, please provide details of what changes you think should be made

Q5a  
Yes

QUESTION 5b–Settlement Hierarchy Methodology  
Do you think the current Settlement Hierarchy Methodology –specifically with respect to determining larger Villages –is appropriate for this review? If not, please provide details of what changes you think should be made.

Q5b  
Yes

QUESTION 5c–New Settlement  
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles? If so, please outline any suitable and deliverable proposals.

Q5c  
No comment

QUESTION 6 –Housing Need and Requirement  
Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven? If not, what evidence do you have to justify an alternative need and requirement?

Q6  
Have SKDC used the current “standard methodology” or the proposed methodology from the “Changes to the Current Planning System” consultation (Oct 2020)?  
Is this the constrained or unconstrained housing requirement?  
  
Is the figure of 754 dwellings a reasonable one for the District? Can this figure be delivered bearing in mind that SKDC has failed to achieve its current housing requirement (650dpa) delivering just 563 dwelling per annum since 2012.  
  
Castle Bytham Parish Council raise these questions because of the implications for an unreasonable housing target on sustainable development in rural areas. Will an unreasonable housing target result in disorganised developments, achieved through planning appeals, with little consideration of the implications on local infrastructure & local housing needs.  
  
Castle Bytham Parish Council seek to support housing development that is organised and coordinated – this means that the housing requirement for the entire District needs to be a reasonable one.

QUESTION 7a –Focus of Housing Growth on Grantham  
Do you agree that Grantham should remain as the focus for growth in South Kesteven? If not, please provide details and any alternative proposals.

A7a

Yes
<p>QUESTION 7b –Stamford, Bourne and The Deepings</p> <p>Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth? If not, please provide details and any alternative proposals.</p>
<p>A7b</p> <p>Yes</p>
<p>QUESTION 7c –Larger Villages</p> <p>Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities? If not, please provide details and any alternative proposals.</p>
<p>A7c</p> <p>Yes</p>
<p>QUESTION 7d –Other Settlements</p> <p>Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”? If not, please provide details and any alternative proposals.</p>
<p>A7d</p> <p>Agree not appropriate to make allocations, however should use Neighbourhood plan to support development areas.</p>
<p>QUESTION 7e –Consideration of the Market and Deliverability*</p> <p>Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?</p>
<p>A7e</p> <p>Yes</p>
<p>QUESTION 8 –Gypsy and Traveller and Travelling Show people Accommodation</p> <p>Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations? If yes, please provide details.</p>
<p>A8</p> <p>No, however we would expect to see these in the plan.</p>
<p>QUESTION 9a –Strategic Employment Allocations</p> <p>Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable? If not, please provide details.</p>
<p>A9a</p> <p>Not relevant for CB so “no comment”</p>
<p>QUESTION 9b –Other Employment Allocations Increasing Flexibility on Established Employment Areas</p> <p>Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study? If not, please provide details</p>
<p>A9b</p> <p>Not relevant for CB so “no comment”</p>
<p>QUESTION 10 –Climate Change Policies</p> <p>Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change? If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.</p>
<p>A10</p> <p>Not sufficient enough. Further action on reduction of carbon emissions by 80% should be outlined. The current plan does not demonstrate how the policies and actions will reduce CO2. There is no specific robust policy in line with this requirement in our opinion.</p>

QUESTION 11a –Energy Performance Standards in Residential Development  
Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

A11a  
Yes

QUESTION 11b –Energy Performance Standards in Non-Residential Development  
Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

A11b  
Yes. Standards that are consistent with the resolution that Objective 13 delivers. BREEAM Outstanding should be targeted.

QUESTION 11c –Viability Implications of Higher Energy Performance Standards  
If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

A11c

Arto Saar et al. Financial viability of energy-efficiency measures in a new detached house design in Finland 2013;

Audenaert A, De Cleyn SH, Vankerckhove B. Economic analysis of passive houses and low-energy houses compared with standard houses. Energy Policy 2008;

Roberts S. Effects of climate change on the built environment. Energy Policy 2008;

Wang L, Gwilliam J, Jones P. Case study of zero energy house design in UK. Energy Build 2009

Hasan A, Vuolle M, Sirén K. Minimisation of life cycle cost of a detached house using combined simulation and optimisation. Build Environ 2008;

Herzog et al. Renewable Energy: A Viable Choice 2001;

Kuronen, Lumoma-Halkola et al. Viable urban redevelopments – exchanging equity for energy efficiency. 2010;

QUESTION 12 –Need for Caravan Accommodation  
Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

A12  
No

QUESTION 13 –Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

A13

Yes.

QUESTION 14 –Any Other Comments

Is there anything else you would like to raise –has anything been missed, or are there any general comments you would like to make?

A14

CBPC would like to thank SKDC for the work that has gone into this “Issues and Options Report” and look forward to working closely with the Council to deliver the sustainable growth within the district.



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

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**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

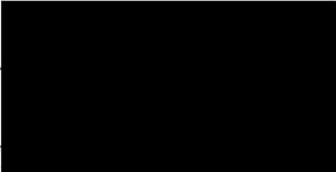
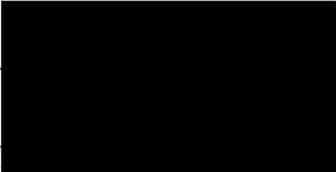
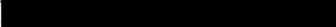
**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
<b>Title</b>	Miss	
<b>First Name</b>	Joyce	
<b>Last Name</b>	Stevenson	
<b>Organisation</b>		
<b>Address</b>		
<b>Postcode</b>		
<b>Telephone</b>		
<b>Email Address</b>		

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	18 <sup>th</sup> November 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>8. Proposal 4 – Plan Period</b>					
<b>Q4 – Plan Period</b>					
Do you agree with the proposed plan period up to 2041?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details					

<b>9. Proposal 5 – Settlement Hierarchy</b>					
<b>Q5a – Settlement Hierarchy</b>					
Do you think the Settlement Hierarchy should be retained in the new Local Plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not, please provide details of what changes you think should be made.					

<b>Q5b – Settlement Hierarchy Methodology</b>					
Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not, please provide details of what changes you think should be made.					

<b>Q5c – New Settlement</b>					
Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If so, please outline any suitable and deliverable proposals.					

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

The viability of the retail, pub/restaurant and other community service offer in relation to the existing population within the villages should be seriously considered to prevent the further decline into dormitory settlements by the allocation of even more housing.

Note: Additional housing and population should not further compromise the settlement's nature and character.

**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details and any alternative proposals.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).”*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please give details.

### Q11c – Viability Implications of Higher Energy Performance Standards

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

### 16. Proposal 12 – Need for Caravan Accommodation

#### Q12 – Need for Caravan Accommodation

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	<input checked="" type="checkbox"/>	Unsure	
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Please give details

### 17. Proposal 13 – Parking Standards

#### Q13 – Parking Standards

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	<input checked="" type="checkbox"/>	No		Unsure	
-----	-------------------------------------	----	--	--------	--

Please give details

All new developments should provide adequate on site parking which will be used for on site parking and not be converted for other purposes; forward gear access to the highway; and any permitted on-street parking require driveways to be kept clear. Where possible also existing housing, business/retail & off-site development vehicle parking.

### 18. Any other Comments

#### Q14 – Any other Comments

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

Re: Q5c-New Settlement. Note: Vision & Objectives for SK. 2.2 Proposal 1 (p.4) Grantham. Spitalgate Heath - a nationally designated Garden Village.  
P13. Proposal 5- Settlement Hierarchy, states that there are no proposals for a Garden Village in the Review. This appears contradictory. Need for clarification.

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

**Thank you for responding to this consultation.**



For Official Use Only:

REF: SK.IAO.0112

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name	R.	KIT
Last Name	Peasgood	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address	[REDACTED]	
Postcode		
Telephone		
Email Address		

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**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
We believe that Policy H1 needs to be updated to acknowledge any new allocations that come forward through the current Plan process. This is particularly the case for development in smaller and larger villages, which have the potential to provide a large amount of the required allocation, without significant impact on services or infrastructure.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details of what changes you think should be made.

We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	✓	No		Unsure	
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If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	✓	Unsure	
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If so, please outline any suitable and deliverable proposals.

--

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

--

**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

We believe that development should be more equally spread across the district and, as mentioned above, there should be an increased allocation among smaller and larger villages which offer many windfall sites without seriously impacting the infrastructure.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

If not, please provide details and any alternative proposals.

A lot of smaller settlements (larger and smaller villages) offer the opportunity to develop brownfield and derelict sites without having a detrimental impact on the character and situation of the village. Many of these have the potential to incorporate new and improve road/traffic infrastructure within the land parcels, or close by, to help tackle existing infrastructure issues.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
-----	--------------------------	----	--------------------------	--------	-------------------------------------

If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

--

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

Please give details.

--

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

Please give details

We believe that many larger developments have failed to provide adequate car parking facilities. There is sufficient land in the district, we believe, to facilitate development with more comprehensive parking facilities within those developments.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

--

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0113

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

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**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name		KIT
Last Name	Tinsley	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address	██████████	██████████ ██████████ ██████████
Postcode		██████████
Telephone		██████████
Email Address		██████████

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

<b>Signature (please type for an electronic response)</b>	<b>Date</b>
██████████	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
We believe that Policy H1 needs to be updated to acknowledge any new allocations that come forward through the current Plan process. This is particularly the case for development in smaller and larger villages, which have the potential to provide a large amount of the required allocation, without significant impact on services or infrastructure.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	✓	No		Unsure	
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If not, please provide details of what changes you think should be made.

We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	✓	Unsure	
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

If not, please provide details and any alternative proposals.

We believe that development should be more equally spread across the district and, as mentioned above, there should be an increased allocation among smaller and larger villages which offer many windfall sites without seriously impacting the infrastructure.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

------------------

**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

A lot of smaller settlements (larger and smaller villages) offer the opportunity to develop brownfield and derelict sites without having a detrimental impact on the character and situation of the village. Many of these have the potential to incorporate new and improve road/traffic infrastructure within the land parcels, or close by, to help tackle existing infrastructure issues.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	✓	Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

----------------------

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

Please give details.

----------------------

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

Please give details

We believe that many larger developments have failed to provide adequate car parking facilities. There is sufficient land in the district, we believe, to facilitate development with more comprehensive parking facilities within those developments.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

--

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0114

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

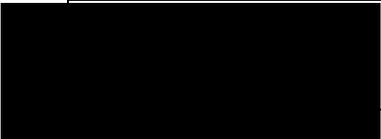
**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name	R.	KIT
Last Name	Adcock	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
We believe that Policy H1 needs to be updated to acknowledge any new allocations that come forward through the current Plan process. This is particularly the case for development in smaller and larger villages, which have the potential to provide a large amount of the required allocation, without significant impact on services or infrastructure.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

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**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

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Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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Yes		No	✓	Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

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If not, please provide details.

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If not, please provide details.

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**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please give details.

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If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

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Yes		No	✓	Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
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Please give details

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**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0115

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

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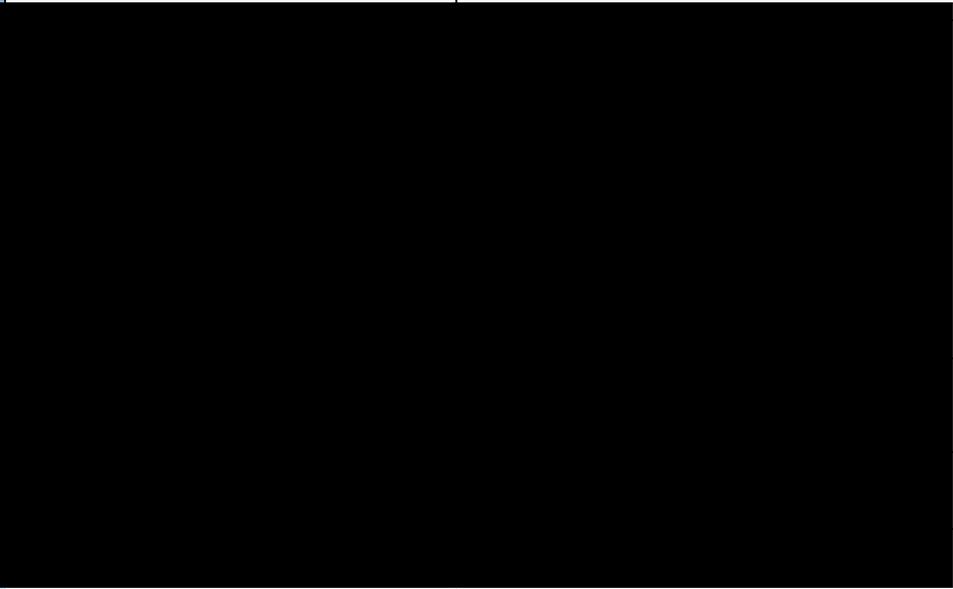
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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name		KIT
Last Name		LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

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Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

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Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

We believe that development should be more equally spread across the district and, as mentioned above, there should be an increased allocation among smaller and larger villages which offer many windfall sites without seriously impacting the infrastructure.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

A lot of smaller settlements (larger and smaller villages) offer the opportunity to develop brownfield and derelict sites without having a detrimental impact on the character and situation of the village. Many of these have the potential to incorporate new and improve road/traffic infrastructure within the land parcels, or close by, to help tackle existing infrastructure issues.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	✓	Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

Please give details

We believe that many larger developments have failed to provide adequate car parking facilities. There is sufficient land in the district, we believe, to facilitate development with more comprehensive parking facilities within those developments.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0116

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

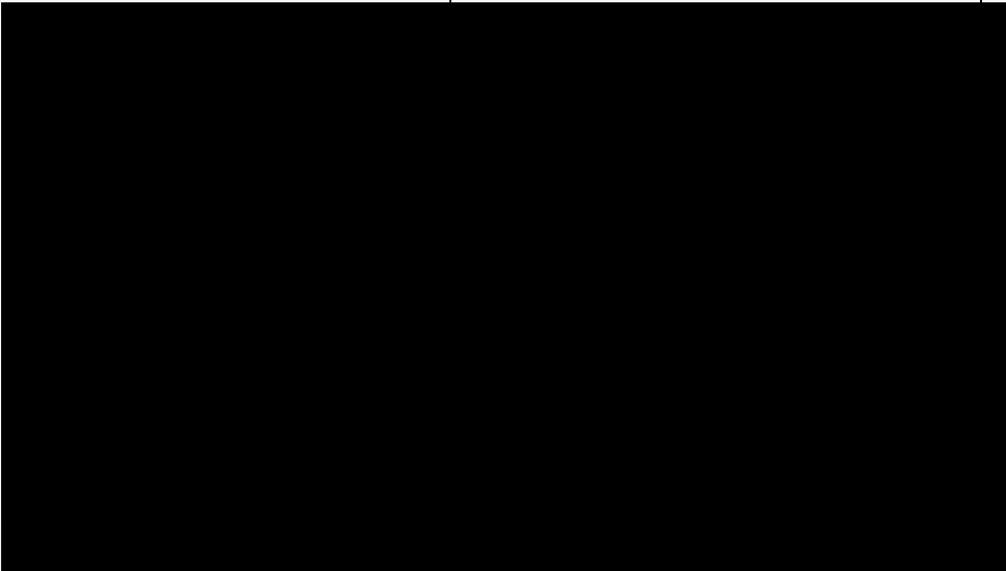
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The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name		KIT
Last Name	Killham, Hill, Custons & Wire	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
We believe that Policy H1 needs to be updated to acknowledge any new allocations that come forward through the current Plan process. This is particularly the case for development in smaller and larger villages, which have the potential to provide a large amount of the required allocation, without significant impact on services or infrastructure.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

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**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

--

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

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Yes		No	✓	Unsure	
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Please provide details

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If yes, please provide details.

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Yes	✓	No		Unsure	
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

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**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

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Please give details

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Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
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Please give details

We believe that many larger developments have failed to provide adequate car parking facilities. There is sufficient land in the district, we believe, to facilitate development with more comprehensive parking facilities within those developments.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0117

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

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**Part C** is your response to the Sustainability Appraisal Scoping Report

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name		KIT
Last Name	Knight	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address	[REDACTED]	
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

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<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
[REDACTED]	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
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Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
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Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

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Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	✓	No		Unsure	
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If not, please provide details of what changes you think should be made.

We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.

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**Q5c – New Settlement**

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Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

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If not, please provide details and any alternative proposals.

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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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Yes		No	✓	Unsure	
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Please provide details

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Yes		No	✓	Unsure	
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If yes, please provide details.

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Yes	✓	No		Unsure	
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Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

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**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

--

**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	--------------------------	----	-------------------------------------	--------	--------------------------

Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
-----	--	----	---	--------	--

Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

Please give details

We believe that many larger developments have failed to provide adequate car parking facilities. There is sufficient land in the district, we believe, to facilitate development with more comprehensive parking facilities within those developments.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

--

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0118

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

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**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

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**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

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The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

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**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name		KIT
Last Name	Whitfield	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address	██████████	██████████ ██████████ ██████████
Postcode		██████████
Telephone		██████████
Email Address		██████████

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

<b>Signature (please type for an electronic response)</b>	<b>Date</b>
██████████	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
We believe that Policy H1 needs to be updated to acknowledge any new allocations that come forward through the current Plan process. This is particularly the case for development in smaller and larger villages, which have the potential to provide a large amount of the required allocation, without significant impact on services or infrastructure.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details of what changes you think should be made.

--

**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

--

**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

We believe that development should be more equally spread across the district and, as mentioned above, there should be an increased allocation among smaller and larger villages which offer many windfall sites without seriously impacting the infrastructure.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

A lot of smaller settlements (larger and smaller villages) offer the opportunity to develop brownfield and derelict sites without having a detrimental impact on the character and situation of the village. Many of these have the potential to incorporate new and improve road/traffic infrastructure within the land parcels, or close by, to help tackle existing infrastructure issues.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	✓	Unsure	
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Please provide details

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\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
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If yes, please provide details.

--

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
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If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	--------	--------------------------

If not, please provide details.

--

**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please give details.

--

**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

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Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
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Please give details

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**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

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Please give details

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**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

--

**Thank you for responding to this consultation.**

For Official Use Only:

REF: SK.IAO.0119

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

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Regulation 18 Issues and Options Consultation Response Form  
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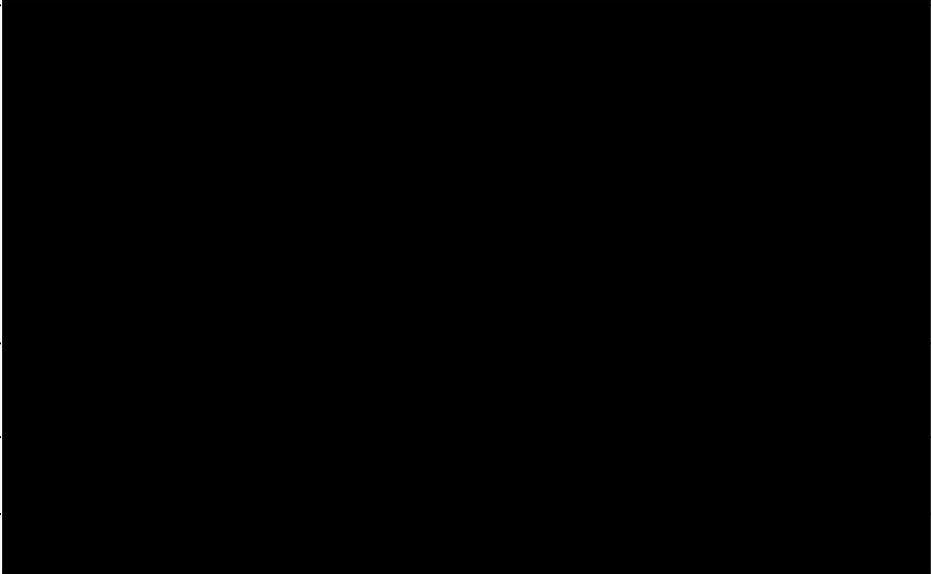
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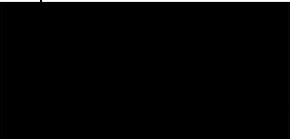
**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name	A.	KIT
Last Name	Woolley	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address		
Postcode		
Telephone		
Email Address		

*Please note: that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.*

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**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

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<b>Q1a – The Vision</b>					
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If not please provide details.					
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<b>6. Proposal 2 - Objectives</b>					
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Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
-----	---	----	--	--------	--

If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

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Yes	✓	No		Unsure	
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Please give details

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**18. Any other Comments**

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Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

--

**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**

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REF: SK.IAO.0120

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Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name	J.	KIT
Last Name	Day	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address		
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

3. If you are not already on our consultation database and you respond your details will automatically be added to the database	
<p>If you do not wish to be added or would like your details to be removed, then please select the following box</p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

Signature (please type for an electronic response)	Date
	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
We believe that Policy H1 needs to be updated to acknowledge any new allocations that come forward through the current Plan process. This is particularly the case for development in smaller and larger villages, which have the potential to provide a large amount of the required allocation, without significant impact on services or infrastructure.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	✓	No		Unsure	
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	✓	No		Unsure	
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If not, please provide details of what changes you think should be made.

We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	✓	No		Unsure	
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If not, please provide details of what changes you think should be made.

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**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes		No	✓	Unsure	
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

We believe that development should be more equally spread across the district and, as mentioned above, there should be an increased allocation among smaller and larger villages which offer many windfall sites without seriously impacting the infrastructure.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

A lot of smaller settlements (larger and smaller villages) offer the opportunity to develop brownfield and derelict sites without having a detrimental impact on the character and situation of the village. Many of these have the potential to incorporate new and improve road/traffic infrastructure within the land parcels, or close by, to help tackle existing infrastructure issues.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	✓	Unsure	
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Please provide details

*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
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If yes, please provide details.

**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
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If not, please provide details.

**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
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Please give details

We believe that many larger developments have failed to provide adequate car parking facilities. There is sufficient land in the district, we believe, to facilitate development with more comprehensive parking facilities within those developments.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**

## SKDC Local Plan Review to 2041 – Issues and Options Responses by Buckminster November 2020

[Question 1a](#) Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?

Yes. Specific comments are:

- make it clear why ‘strong links’ with Peterborough, Cambridge and London must be in place, by when and of what nature so this can be pursued and monitored. Is there a risk this vision statement under values links to the north and the nearby cities of Lincoln and Nottingham?
- the ambition to ensure that development is sustainable in terms of location, use and form can surely only relate to ‘new’ development? This is because arguably some existing development is in unsustainable locations, but with established uses that cannot be over-ruled. If such sites are identified, perhaps the policy should at least be not to support their expansion, or not to worry about the transition impact on jobs if those unsustainable locations end up struggling economically.
- the vision for town and village centres references developing ‘appropriately’ and ‘in a good environment’. Could this more ambitiously reference that any growth and development should take the opportunity to ‘enhance’ the same? Much of the good study work to date specifically references those enhancement opportunities, and usefully down to a great level of detail, and so can be used as a measure by the Council for judging proposals and locking in commitments without new thinking i.e. a) the *SKDC Conservation Area Appraisals/Management Plans*, b) the *Natural England National Character Area Profile guidance* documents, c) the *Neighbourhood Plans*, and d) the *SKDC Green Infrastructure Strategy*.
- The word ‘Sustainable’ with reference to the Garden Village would better deleted, as it is no longer an SUE as such.
- A vision only to make Grantham Town Centre ‘safe’ and ‘attractive’ is not sufficient to deal with its economic recovery. Something needs adding eg it will need to be re-branded, its offering extended, and investment creatively focused.

[Question 1b](#) Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?

No. The Vision lacks a reference to how and to what degree SKDC’s declared climate change emergency will shape the decision-making pursuant to the vision. That established, a vision statement in isolation would not anyway ‘deal’ with climate change: the strategies to be adopted to achieve the Vision would. There would need to be a separate strategy section of the plan to deal with the detail of this. In that regard ambitious and time targeted plans need putting in place to make a meaningful impact on carbon reduction in the District e.g. i) retro insulating all homes by 2030 – there may be full grants, council tax breaks and planning tools that could be used whereby associated new development is not permitted until such is effected, ii) mandate no new dwellings (or extended dwellings) should use or have a fossil fuel source (i.e. no gas or oil) ahead of the Government date (now 2023), iii) new commercial planning permissions requiring higher standards of recycling and packaging use iv) charging householders for their refuse bin, v) no export of recycling outside the region, vi) permissions for any incinerators to require the most leading edge technology, cost aside, and mandating heat to power offtake, vii) full transparency on destination of commercial waste and recycling rates viii) a more effective system than the mixed ‘grey bin’ system

where there is low discipline/poor instruction on use and contamination which results in low recycling rates etc. A task force is probably needed working with the County, to come up with a full range of ambitious/creative ideas, many of which are out in the academic/public domain already.

[Question 2 Do you agree that the Objectives should remain the same for the new plan?](#)

Not completely. It would be clearer and more powerful if the statement of objectives remained just that ie the wording does not drift in to the 'how', 'by' and 'through' e.g. delete the bullets in objectives 3 and 8: either move those to the strategy section or if valid make them objectives in their own right.

The Objective 6 sub-clause starting 'as well as' should substitute the word 'whilst'. Why not reference the role of the 'larger villages' here too?

The third bullet in Objective 8, (whilst a strategy) suggest add 'car sharing'.

Add a specific section underlined Climate: Reducing Energy Use and Mitigation Strategies. The strategy flowing from the objective to reduce energy use/consumption radically would be to encourage, through design, for heat and light energy to be minimally used in the first place. (The Climate Change Emergency Plan of the Council would separately deal with how procurement of its energy including in its housing portfolio, along with the goods and packaging consumed by the Council in its operations and deployment would have a long life cycle/be renewably sourced.) It might help in thinking about the Objectives to rank them in perceived order of importance, confirming for the reader that has been done.

[Question 3 Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?](#)

Not completely:

- E1 - as we represented 2019 (see attached with supplementary comments of 4<sup>th</sup> January 2020) we do not consider the southern extent of GRE-SE1 has been objectively tested with a full site walkover and setting analysis on the ground against the landscape assessment, respecting the attractive nature of the steep rolling topography, and the desire to create an attractive 'gateway' on approaching Grantham from the south.
- LV – H10 - we believe this allocation should be revoked as the site could form part of an extended green heart of this intensively developed village (which has future potential for extension but with a more sensitive pattern than previously).
- SD1 - as per the emerging Environmental Bill, reference should be had to Biodiversity Net Gain, on (preferably) or off-site.
- After paragraph (d) add 'the use of energy associated with the change of use or extension of the subject building as a whole'.
- SP1 - we note by its absence this may be changed significantly. It is vital that Grade 1, 2 and 3a land is still given a higher ranking in terms of protection. In restoring land though it is not practical to state that the land (i.e. soil) will be of 'at least equal quality', even though that may be a worthy aspiration.
- SP2 - we are concerned the settlement hierarchy policy implicitly may change significantly. Much work has been done on this, and it makes and remains common sense what has been

settled upon i.e. concentration based around services. The idea of throwing in a possible garden village, inevitably isolated from a train station making sustainability challenging, and with all the infrastructure issues, together with its landscape and agricultural resource damage implications may well not be needed: the preference should surely be to enhance existing nodes of employment and growth opportunity, especially making material progress with our proposed major urban/garden village extensions before opening any new fronts.

- SP4 - paragraph (e) will need to be widened, as it is hard specifically to prove a local need: there is a substantial district/regional/national need for more housing, appropriately distributed.
- H1 – it is hard to judge when an increase in housing allocation numbers is ‘significant’, as this plan requires.
- E4 – where uses outside B1, B2 and B8 are proposed, these should not be supported where likely to impact on nearby town centres. The layout of sites should be reviewed to identify those sites that are not in town centres, such that B2 office use is not supported, thereby encouraging that use to locate to town centres.
- E5 – Expansion of existing retail businesses that could divert footfall from town centres should not be supported.
- E6 – vacant or unviable out of town employment sites should be sequentially less preferred for leisure uses where that can be provided in or on the edge of town centres.
- DE1 – Whilst it is referenced in SB1, given the importance of this matter, a paragraph should be added concerning low energy use in the design.
- SB1 – This reads weakly as the initial emphasis is on mitigation - which should be subsidiary. New development should not just ‘demonstrate how’ CO<sub>2</sub> emissions are minimised, but it ‘will’ do so.
- C – systems
- 3 – add a paragraph to show how new development will provide for links to bus and other more sustainable travel modes.
- GR4 – May need refining in light of the High Street Fund bid. Somewhere we need to reference the ambition of a better standard of maintenance and greening.

[Question 4](#) Do you agree with the proposed plan period up to 2041?

Yes.

[Question 5a](#) Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes.

[Question 5b](#) Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining Larger Villages – is appropriate for this review?

Yes

[Question 5c](#) Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

No (and see answer to Q3)

[Question 6](#) Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes

[Question 7a](#) Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes

[Question 7b](#) Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes, but Stamford's expansion beyond what has been set is likely to damage its particular character/history. Previous house design and setting consideration along the western boundaries as seen from the A1 arguably has resulted in an impact that is out of character with the town.

[Question 7c](#) Do you agree that it is still appropriate for a level of housing growth across the Larger Villages within South Kesteven where there are a range of available services and facilities?

Yes

[Question 7d](#) Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through "windfalls"?

Yes

[Question 7e](#) Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes

[Question 8](#) Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

We are not aware of any specific needs. We would be pleased to understand the suitable sites criteria. Allocation is not necessarily needed if there is a general policy that would allow applications to be formally considered on sites that might not otherwise meet the criteria for residential development.

We consider the Council should consider whether all existing sites are appropriately located in terms of character and where alternative more sustainable sites could be proposed, or enhancements encouraged to the access boundary treatment and landscaping of existing sites.

[Question 9a](#) Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes, but as above with the exception of the part of a field added to the south of GRE-SE1 on the basis its addition to the previous allocation was not carried out with a robust and transparent analysis of its suitability set against the innate landscape merits and the economics of deliverability given especially the steep and rolling (and attractive therefore) topography, and set against the vision for a gateway to Grantham here. In the context of the 'over' provision based on a previous demand study to offer choice, this is of particular importance if the Council wants to ensure careful planning and to improve the status of Grantham.

[Question 9b](#) Do you agree that other employment allocations set out on Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes

[Question 10](#) Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

No.

Please see our response to Question 1b.

Your introductory light blue paragraph is incorrect in stating that enhanced standards 'cost more': they only initially cost more, but over the life cycle of the property the costs including externalities will be less, and would be reflected in lower running costs to the buyer. With better understanding and information to a buyer, that in theory should mean an increased sale price, offsetting the initial higher cost to the developer.

Neither do we agree with the way your third sentence in the light blue box states that a balance needs to be struck between standards and cost of delivery: if the Council is serious about the climate emergency and is to act, then it should be unashamedly requiring the highest energy performance standards of any new or extended or re-purposed buildings. This action combined with the efforts of the whole nation, will in only a few years drive down the upfront costs of delivering the 'right' solution to society and occupiers.

Otherwise the Council is granting permission for sub-optimal energy solutions, making developments over their life-time unsustainable, flying in the face of the Council's stated ambitions for sustainable development.

This paragraph as phrased is an indication the mindset of the policy unit of the Council has not yet caught up with the Council's declarations, which themselves have unambitious elements in terms of achieving the wins on offer sooner. A successful economy is dependent upon a sustainable environment. Development should cause the least damage to the environment (CO<sub>2</sub> output), and similarly is going to be required to show biodiversity net gain. If the environment is put first (not requiring a compromise 'balance'), then the existing context is best set for 'distinguished'

development. Nothing special will happen for South Kesteven unless it leads, differentiates and makes a meaningful difference to the way that development standards are set.

[Question 11a](#) Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes. However, the word 'equivalent' needs adding as the Code for Sustainable Homes is no longer mandated. (Please see paragraph at end of Q.11 (c).

We have reviewed the Council's 2019 Climate Emergency declaration. This references all new builds to at least Sustainable Code 3: this is unambitious, and needs to be aligned with the Code 4 suggestion in this Issue and Options consultation. Whilst it is acknowledged 'more work' may need to be done to 'gauge practicalities, implications and costs', the commitment only to 'reduce' the organisation's carbon footprint by 2030 is disappointing: that risks little real action being taken in the initial short term period, locking in carbon impacts, and making the 2050 target harder and more costly to achieve. Moreover, the declaration only bites in relation to the Council's carbon footprint, even though it recognises the importance of the much more far-reaching impact (by implication through the policy and community leadership role) it can have in reducing the carbon footprint of its residents, businesses, public sector organisation and visitors. Pleasingly the 'task and finish' group is to systematically consider the impact inter alia of its 'planning' activity, and in 4.5 it is recognised the implications of delivering net-zero carbon will provide longer term savings.

[Question 11b](#) Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes. The highest legally adoptable standards. As an example new schools have been built without a prime fossil fuel source ie no gas.

[Question 11c](#) If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

As in 11a, it is common sense that lower energy performance standards will over the lifetime of a development lead to a greater energy cost to occupiers. If it takes reduced developer contributions otherwise, then they should be used. The current method of setting how the 'viability' benchmark is arrived at needs changing.

<https://www.ukgbc.org/wp-content/uploads/2018/07/Driving-sustainability-in-new-homes-UKGBC-resource-July-2018-v4.pdf>

Please see the link above to the UK Green Building Council document Version 1.1: 2018 '*Driving Sustainability in New Houses: a resource for local authorities*'.

P.19 refers to the industry experience in delivering the Code for Sustainable Homes level 4 (and equivalent), which (however) does not require a radically different approach to design. A 19% improvement beyond Part L 2013 Edition of the Building Regulations can be achieved entirely

through energy efficiency measures (enhanced insulation, glazing, air tightness and high efficiency heating and hot water heat recovery) costing £2-5K/house. The capital costs if adopting a renewables-based strategy i.e. PV can achieve a similar improvement costing £1500-2000 per house. GBC believes this would not impede delivery, as this will be factored into the land acquisition and eliminated over time through supply chain innovation and efficiencies.

P.25 references the authorities already applying the recommended baseline requirements e.g. Cambridge City.

P.26 references the authorities going beyond the recommended baseline requirements e.g. Milton Keynes Council suggesting on-site renewables generation or schemes, and making financial contributions to the Council's carbon offset fund.

P.35 to 36 emphasises how local authorities can play a crucial role in incentivising the building industry in overcoming the problem energy used in operation is regularly much higher than predicted. The recommendations are developers are required to show that they have acted to close the performance gaps e.g. via internal processes or third party systems such as the BEPIT Better Building Tool Kit or NEF's Assured Performance Toolkit, or demonstration of certification such as Home Quality Mark, Passivhaus or Energiesprong. It is recommended local authorities commit to a system of in-use testing and reporting on not only energy performance, but also indoor air quality and thermal comfort (for heat and welfare).

P.46 onwards deals with viability. The NPPF sets guidance to show higher sustainability standards will not affect housing delivery. Providing local evidence might be daunting for local authorities with tight budgets and pressure on land values. The viability section from P.49 is designed to be educational for local authority sustainability officers who wish to drive higher sustainability standards through planning. The GBC identifies opportunities to work with the current system to deliver more progressive outcomes, and suggests ways to capture wider social and environmental value in viability assessments. One key point is that developers cannot avoid complying with policies on the basis they paid for the land without factoring in the potential for increased costs (this policy needs to signal this). Equally developers will find a way to pass on these costs e.g. through adjustments to the land value/price paid for sites.

P.66 puts its finger on the problem of the Council's current viability approach. This standard approach of focusing on the ability of a development to absorb all capital costs is conservative, as it assumes no additional longer-term value from investment in sustainable buildings and infrastructure. As carbon reduction strategies deliver whole-life value for landlord and/or occupier (e.g. lower energy bills or new revenue streams), an alternative approach is to capture this value by calculating NPV over a longer period of time ie 25-30 years: this approach should be built in to local plans.

P.67 conceptualises the new series of 'externalities' (benefits and burdens to an area that development brings) as an effective extension of CIL and S.106. eg the health benefits of new walking and cycling infrastructure; productivity gains from reduced congestion; resilience from investment in energy efficiency. See UKGBC's *Introductory Guide to Social Value in New Development* for recommendations for integrating social value in the planning process.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/290679/scho0805bjns-e-e.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/290679/scho0805bjns-e-e.pdf)

Please see the link above to the Environment Agency Paper of June 2005 '*Sustainable Homes – the financial and environmental benefits.*' The paper supports the hypothesis that investing in making homes more energy efficient could be achieved by a small reduction in land values. The benefits of higher standards largely accrue to the householder, significantly improving the affordability of new houses. The referenced RSPB study concludes that once external environmental costs are included, the benefits from reduced energy use of building houses to the old Eco Homes Excellent standard were 6 times greater than the costs. Their study showed a 6 year payback via reduced utility bills from resource efficiency costing just £800/home (before weighing in external impacts).

Efficient homes can be more affordable for those on low incomes. Studies referenced show the high interest in knowing the environmental rating of a home when buying. Most are prepared to pay 2% more for a sustainable home, and 20% for innovative design and green features. The evidence of savings that can be made compared to houses built to Buildings Regulations, were discounted at different rates over 25 years in their study. The benefits to developers of building to enhanced resource efficiency standards referenced were: waste reductions in construction process; sustainability credentials; staff productivity; market edge; and getting ahead of likely tightening of new regulations.

The Code for Sustainable Homes has been replaced by new national technical standards which comprise new additional optional Building Regulations. These additional options (which are comparable with the requirements for the former Code for Sustainable Homes Level 4) can be required by a planning permission. The new national technical standards should be required only through new Local Plan policies where their impact on viability has been considered. Where any such existing policy refers to the Code for Sustainable Homes, LPAs may continue to apply requirements for standards equivalent to the new national technical standard. The Future Homes Standard would be referenced in the future as its review will likely be settled in the next year or so. This has consulted on the changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings. The review of Part L for commercial buildings should follow.

[Question 12](#) Are you aware of any need for sites for caravans in South Kesteven?

No. We expect there is a demand for caravan sites. Larger and permanent sites can be intrusive visually, and proposals should perhaps best be dealt with on an exceptional basis on their merits with specific controls, rather than via allocation. Small-scale rural schemes can work well.

[Question 13](#) Do you agree that minimum parking standards are needed in South Kesteven?

No opinion

[Question 14](#) Is there anything else you would like to raise?

Prepare a Sustainable Waste/Recycling Policy and Practice paper, setting performance reporting.

## Amy Bonfield

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**From:** William Lee [REDACTED]  
**Sent:** 04 January 2020 12:03  
**To:** PLANNING POLICY  
**Subject:** FW: Local Plan Main Modifications - Public Consultation - Buckminster Response on MM22  
**Attachments:** Buckminster Main Mods Response Form.pdf; Buckminster Main Mods Response Annex Plans A-C.pdf; Landscape\_Sensitivity\_and\_Capacity\_Study\_Oct\_2013.pdf

Dear Mr Ranson

I should just correct ourselves as regards the AGLV policy which was of course not saved in Sept 2007. However as per the 2013 Landscape Study (attached) this does not mean the area has no value (2.30), and in assessing landscape value (for the limited specified areas that study related to) bbe included consideration of whether the study area lies within or adjacent to such an area previously so designated (2.31).

To the extent that the 2013 Study and its Plans do refer to the Employment Area west of the B1174, it does not cover the scenario now of that being proposed at the time to extend substantially further south.

It is clear to me no one has really thought about this or owns a vision as to the 'look' of the southern gateway to Grantham approaching off the A1 at the B1174 or at the new A52 link. On the current trajectory without some detailed impact assessment we risk creating a 'shouting block monster', tarnishing Grantham's market town image. Have you seen the sheds outside Peterborough and Newark, and in both cases unlike at Grantham on land with no characterful topography and green setting? Soft policy wording around remedial landscaping are not going to cut it in my view.

I hope we can work with the Council somehow to reconsider fully.

Yours sincerely

William Lee

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**From:** William Lee  
**Sent:** 11 November 2019 11:57  
**To:** [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)  
**Subject:** Local Plan Main Modifications - Public Consultation - Buckminster Response on MM22

Dear Mr Ranson,

I believe the proposed extension of GR.SE1 is unsound in that it does not fairly assess the impact on the landscape and it cannot be reconciled with the stated aim to create an attractive gateway here to the sub-regional centre of Grantham.

The land is designated an Area of Great Landscape Value, but can be distinguished as being unacceptable for allocation as compared to the rest of the GR.SE1 allocation in this designated area for the following reasons:-

1. Land west of the A1 is level, close to and immediately accessible from the new A1/Southern Relief Road link (GSRR), and bounded to the west by the detracting feature of power lines.

2. The designer village site to the north is relatively level, and for which the development will be effectively only maximum 2 storey. It is set against a. the new GSRR link road north, the levelled former quarried land east and b. the imposing Environcom building further east on Spittlegate 'Level'.
3. Allocated land north of the new road, including the current construction compound is also level.
4. The allocated field immediately north of the 'green' coloured GR.SE1 extension is a complete field, and is at least wholly designated as having 'medium' sensitivity to development, whereas the green area is a part field and is partly designated as having a 'medium-high' sensitivity to development. (See Plan B attached)
5. Development of this part field (an additional 9ha) creates an out of character 'finger' of development south of the new development line of South Grantham as a whole, 'sticking' south in an incongruous fashion in to very attractive countryside, not justified simply because it is bounded by roads on each side.
6. The green area will be immediately opposite the scheduled barrow to the east – it would be a harsh backcloth setting for this ancient feature in grassland.

Study of the exact topography here is important and needs an inspection on the ground to really appreciate its value. (See Plan C attached.) In effect both the green field and existing Cartare allocation to the north of it are on a strongly south facing slope, such that any development here will be highly visible, and impossible effectively to screen anyway. Development of the Cartare land itself is hard enough to envisage given its slope from 110m to 90m AND its very attractive undulating form. (See attached PLAN A Ordnance Survey extract with contours) This is only fully appreciated when passing on the A1, the rolling arable fields providing a characterful setting to what will be the first arrival junction to Grantham and the planned designer village amongst other development ambitions of neighbouring lands in due course. It is shocking even for the existing allocated field to envisage the extensive land re-profiling that will be needed to provide a level base for the types of B8 box sheds (200,000 to 900,000ft<sup>2</sup>) envisaged in the Cartare agent's broad brush demand assessment. Such a giant building or set of very large buildings will *per se* conflict with the stated policy aim of having building heights which respect the sensitivities of the surrounding landscape. At least the southern boundary of the existing allocation has a strong hedged and treed southern boundary, that could possibly be strengthened and shield out the lower half only of such tall buildings the demand assessment alludes to.

But then if the 9ha green area is added this strong southern boundary gets lost in the middle of the development, and there is no existing natural feature to work with. It is evident an arbitrary east-west line has been chosen as the southern boundary of the extended allocation: the shape of the historic grassland is not respected. The contour differential on the green area is 100m to 85m. The compound ie cumulative effect of the drop over two fields from almost 115m north to 85m south means the first impression of the town will be an escarpment on stepped footprints, of harsh-edged and heigh-eaved box sheds of the kind that is so out of character with a market town that its 'image' will be permanently damaged.

The town and its authorities/stakeholders we thought had been trying very hard to incorporate good design choices in its allocations eg the garden village and associated employment in the permission, or on the part brownfield Barracks and otherwise level land that can be screened from gateway approaches and by being of such a granular nature and inherently 'green' and low rise as to be acceptable in the new developed landscape. Now out of apparent yet unproven real demand for long term employment space, a 'knee jerk' last minute choice of an additional area is proposed that inherently cannot square the circle of a. not damaging the landscape, b. the desire for an attractive gateway and c. the desire for B8 space purported by the proponents. B1 would not be appropriate so far from town, and we doubt the demand for industrial uses, having had no approaches ourselves for either on Buckminster parts of the allocation. Such a large allocation for B1, B2, B8 will mean pressure for B8 buildings of building heights that can never be sensitive to the particular landscape here, given its south facing topography and 'jutting out' beyond the reasonable bounds of what should be a firm building line/development limit or extent for development south of Grantham. In short this will be an environmental desecration of the landscape.

Our preference is this additional allocation be dismissed, and the matter shelved until next review of the Local Plan, by which time for example it will be more apparent the depth of demand for employment land of this type and on this scale is really needed, and whether the land east of Spittlegate allocated for residential in the Plan but with a permission (subject to s106) for employment land is indeed better put to an employment use.

If not, then this part field should be reserved for development of a stated building height maximum, so as to rule out un-screenable B8 sheds.

Or at worst it should be a reserve site that may be developed only once all other employment sites in the Grantham area in the plan period have been developed.

I trust you will consider these matters.

Yours sincerely

**William Lee MA FRICS | Managing Director**

[Redacted signature block]



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**Amy Bonfield**

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**From:** PLANNING POLICY  
**Sent:** 18 December 2020 13:34  
**To:** PLANNING POLICY  
**Subject:** RE: General Enquiry - [InputTemplate.businessArea.Desc]

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**From:** [REDACTED]  
[REDACTED]  
**Subject:** General Enquiry - [InputTemplate.businessArea.Desc]

## General Enquiry Online

Enquiry Number: 1923573

Name: Hilda Ann Johnson

Address: [REDACTED]

Post Code: [REDACTED]

Email address: [REDACTED]

Date Submitted: 22/11/2020 16:23:10

Telephone: [REDACTED]

Enquiry details: I have tried unsuccessfully to locate Stamford's Local Plan to comment, and am aware the deadline is Monday 23rd November. I want to state that provision of a Household Recycling Centre for Stamford should be included in the Plan; individual trips to Bourne are unsustainable with Stamford's growing population; far bigger than Bourne.  
Any help to meet the deadline gratefully received!

For Official Use Only:

REF: SK.IAO.0124

CN:

ADD:



SOUTH  
KESTEVEN  
DISTRICT  
COUNCIL

**South Kesteven District Council Local Plan Review  
Regulation 18 Issues and Options Consultation Response Form  
Monday 12<sup>th</sup> October to 11.59pm Monday 23<sup>rd</sup> November 2020**

**This form has three parts**

**Part A** is for your personal details

**Part B** is your response to the Issue and Options Consultation Questions

**Part C** is your response to the Sustainability Appraisal Scoping Report

**How to respond:**

Please fill in the response form for each question you wish to comment on. This will enable us to process your comments efficiently and effectively.

**Respond by returning forms by:**

Email: [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk)

Forms can also be returned to Planning Policy, South Kesteven District Council, Council Offices, St Peters Hill, Grantham, Lincolnshire, NG31 6PZ. However, in light of concerns regarding Covid-19 we are encouraging people to submit their representations electronically wherever possible to help limit the spread of infection. The return of forms via email is therefore preferred.

**The deadline for responses is 11.59pm on Monday 23<sup>rd</sup> November 2020.**

All representation will be made publicly available and must be received by 11.59pm on Monday 23<sup>rd</sup> November, otherwise your comments may not be taken into consideration.

The documents, along with further details of the consultation can be viewed on our website <http://www.southkesteven.gov.uk/index.aspx?articleid=15134>

If you require a paper copy of the consultation documents please contact a member of the Planning Policy Team at [planningpolicy@southkesteven.gov.uk](mailto:planningpolicy@southkesteven.gov.uk) or call 01476 406080.

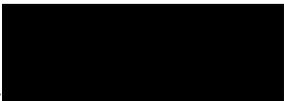
**Part A: Personal Details**

	1. Personal Details	2. Agents Details (if Applicable)
Title		MR
First Name	W.	KIT
Last Name	Ash	LONGSTAFF
Organisation		R. LONGSTAFF & CO
Address	c/o R. Longstaff & Co	
Postcode		
Telephone		
Email Address		

**Please note:** that representations must be attributable to named individuals or organisations. "In confidence" representations will not be accepted. All representations will be available for public inspection and cannot be treated as confidential. We will however redact signatures, home/ email addresses, and telephone contact details from any information that is published.

<b>3. If you are not already on our consultation database and you respond your details will automatically be added to the database</b>	
<p><b>If you do not wish to be added or would like your details to be removed, then please select the following box</b></p> <p><i>Please note: Your contact data will be used to provide information and updates in respect of the Local Plan and any future reviews. Please contact us if you wish to change your communication method and the type of information you receive.</i></p>	

**4. Please Sign and date this form**

<b>Signature (please type for an electronic response)</b>	<b>Date</b>
	23 <sup>RD</sup> NOVEMBER 2020

**Part B: Issue and Options Consultation Questions**

<b>5. Proposal 1 – 2036 Vision for South Kesteven</b>					
<b>Q1a – The Vision</b>					
Do you agree that the Vision should be broadly the same for the new plan but updated with respect to the plan period and housing growth level?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
<b>Q1b – The Vision</b>					
Do you consider that the current Vision is sufficient to deal with climate change and the economic recovery of the District?					
Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
If not please provide details.					

<b>6. Proposal 2 - Objectives</b>					
<b>Q2 – Objectives</b>					
Do you agree that the Objectives should remain the same for the new plan?					
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					

<b>7. Proposal 3 – Policies not proposed to be changed significantly</b>					
<b>Q3 – Policies not proposed to be changed significantly</b>					
Do you agree with the list of Local Plan policies that are not proposed to be changed significantly?					
Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
If not please provide details.					
We believe that Policy H1 needs to be updated to acknowledge any new allocations that come forward through the current Plan process. This is particularly the case for development in smaller and larger villages, which have the potential to provide a large amount of the required allocation, without significant impact on services or infrastructure.					

**8. Proposal 4 – Plan Period**

**Q4 – Plan Period**

Do you agree with the proposed plan period up to 2041?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not please provide details

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**9. Proposal 5 – Settlement Hierarchy**

**Q5a – Settlement Hierarchy**

Do you think the Settlement Hierarchy should be retained in the new Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

We do, though, believe that an increase in allocation of the housing in smaller and larger villages would help fulfil the housing target.

**Q5b – Settlement Hierarchy Methodology**

Do you think the current Settlement Hierarchy Methodology – specifically with respect to determining larger Villages – is appropriate for this review?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details of what changes you think should be made.

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**Q5c – New Settlement**

Given the scale of housing growth to be provided in this Local Plan is there a case for amending the Settlement Hierarchy to include any proposal(s) to establish a new community on garden village principles?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If so, please outline any suitable and deliverable proposals.

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**10. Proposal 6 – Housing Need and Requirement**

**Q6 – Housing Need and Requirement**

Do you agree with the use of 754 dwellings per annum as the identifying housing need and requirement for South Kesteven?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, what evidence do you have to justify an alternative need and requirement?

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**11. Proposal 7 – Distribution of Growth**

**Q7a – Focus of Housing Growth on Grantham**

Do you agree that Grantham should remain as the focus for growth in South Kesteven?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

We believe that development should be more equally spread across the district and, as mentioned above, there should be an increased allocation among smaller and larger villages which offer many windfall sites without seriously impacting the infrastructure.

**Q7b – Stamford, Bourne and The Deepings**

Do you agree that Stamford, Bourne and the Deepings should remain as a focus for growth?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7c – Larger Villages**

Do you agree that it is still appropriate to plan for a level of housing growth across the Larger Villages within South Kesteven where there a range of available services and facilities?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details and any alternative proposals.

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**Q7d – Other Settlements**

Do you agree that it is not appropriate to make allocations in smaller settlements within South Kesteven whilst recognising that some development will occur through “windfalls”?

Yes		No	✓	Unsure	
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If not, please provide details and any alternative proposals.

A lot of smaller settlements (larger and smaller villages) offer the opportunity to develop brownfield and derelict sites without having a detrimental impact on the character and situation of the village. Many of these have the potential to incorporate new and improve road/traffic infrastructure within the land parcels, or close by, to help tackle existing infrastructure issues.

**Q7e – Consideration of the Market and Deliverability\***

Do you agree that market capacity and deliverability should be considered before determining what growth to distribute to which area?

Yes		No	✓	Unsure	
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Please provide details

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*\* (Market capacity is the ability of builders to sell a certain number of homes in a local area each year; Deliverability is the likelihood of a site to be built out. In the National Planning Policy Framework this is defined as “...available now, offer a suitable location for development now, and be achievable with a realistic).*

**12. Proposal 8 – Gypsy and Traveller and Travelling Showpeople Accommodation****Q8 – Gypsy and Traveller and Travelling Showpeople Accommodation**

Are you aware of any specific needs for Gypsy, Traveller or Travelling Showpeople accommodation in South Kesteven and suitable sites to meet these needs, and is it appropriate to accommodate identified needs within any existing Local Plan allocations?

Yes		No	✓	Unsure	
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If yes, please provide details.

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**13. Proposal 9 – Revisions to the Employment Policy****Q9a – Strategic Employment Allocations**

Do you agree that the strategic employment allocations set out in Policies E1 and E2 should be brought forward into the new Local Plan unless strong and robust evidence suggests that they are no longer suitable or deliverable?

Yes	✓	No		Unsure	
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If not, please provide details.

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**Q9b – Other Employment Allocations Increasing Flexibility on Established Employment Areas**

Do you agree that other employment allocations set out in Policy E3 should be reviewed taking account of an updated Employment Land Study?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input type="checkbox"/>
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If not, please provide details.

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**14. Proposal 10 – Climate Change**

**Q10 – Climate Change Policies**

Are the existing policies in the adopted Local Plan sufficient to meet current and future challenge of climate change?

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Unsure	<input checked="" type="checkbox"/>
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If not please provide details of what would be new or revised planning policies that the Council could consider through the review of the Local Plan.

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**15. Proposal 11 – Energy Performance Standards**

**Q11a Energy Performance Standards in Residential Development**

Do you think that the new Local Plan should require higher energy performance standards than are required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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**Q11b – Energy Performance Standards in Non-Residential Development**

Do you think that the new Local Plan should require higher energy performance standards in non-residential development and if so what standards should be required?

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Unsure	<input type="checkbox"/>
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Please give details.

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**Q11c – Viability Implications of Higher Energy Performance Standards**

If you think the Plan should do either of the above, do you have any evidence to demonstrate that requiring higher energy performance standards would or would not be viable? If so please provide this evidence. Alternatively, do you have any suggestions whereby other developer contributions might appropriately be reduced, in order to ensure development remains viable?

Please give details

**16. Proposal 12 – Need for Caravan Accommodation**

**Q12 – Need for Caravan Accommodation**

Are you aware of any need for sites for caravans in South Kesteven? Any evidence to support your comments would be welcome or suggestions as to how such need could be identified in South Kesteven.

Yes		No	✓	Unsure	
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Please give details

**17. Proposal 13 – Parking Standards**

**Q13 – Parking Standards**

Do you agree that minimum parking standards are needed in South Kesteven? Please provide any further comments you may have, such as in relation to what the standards should be or where they should apply to.

Yes	✓	No		Unsure	
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Please give details

We believe that many larger developments have failed to provide adequate car parking facilities. There is sufficient land in the district, we believe, to facilitate development with more comprehensive parking facilities within those developments.

**18. Any other Comments**

**Q14 – Any other Comments**

Is there anything else you would like to raise – has anything been missed, or are there any general comments you would like to make?

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**Part C: Sustainability Appraisal Scoping Report**

**19. Comments about the Sustainability Appraisal Scoping Report**

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**Thank you for responding to this consultation.**